



Regulation 22 Part 1

Appendix E

Regulation 18 Representations Summary and Council Response



Appendix E Reg 22 Consultation Statement

Regulation 18 – Representations Summary and Council Response

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Introduction

The following Report summarises the representations made on the Regulation 18 version of the Dover District Local Plan, its appendices and supporting documents and provides a response to the main issues raised by consultees for each of the options, chapters, sites and Policies of the draft Plan. It also includes comments made promoting sites that were not in the Local Plan (known as Omission Sites).

In total, 3475 comments were received from 1280 respondents. In instances where comments related to more than one site / policy / issue, officers have assigned the representation to one specific location but where relevant, the comments are repeated in the summary and responded to. Representation numbers may therefore appear more than once in the document.

The document is 4 Parts:

- PART A – Representations made on Regulation 18 Local Plan Document
- PART B – Representations made on Appendices
- PART C – Representations made on Evidence Base
- PART D – Representations made on Omission sites (sites not proposed in the Local Plan)

Part A of the report is broken down into chapters of the Reg 18 plan, where the representation numbers and representor names are listed, the comments made are summarised, and then responded to by the Council.

It is important to note the following when reading this document:

- As required by the national guidance for this stage of plan making, the document is a summary only of the representations made, rather than a full account of them..
- All comments, wherever they were placed in the summary of representations document, have been reviewed fully by DDC officers and are taken on individual merit and that it is the content of the representations made which is important, rather than the amount of times a comment has been made or where it was made on the plan.
- Standard responses to comments have been made in instances where the same issue has been raised by multiple consultees or where the same issue has been made multiple times by the same consultee.
- Some comments were made on settlements, rather than specific sites. For ease of reference for locating and viewing comments on non-strategic site allocations, DDC have created a dashboard that allows all the comments made on SAP1 (non-strategic site allocations) to be separated by settlement. This can be viewed [here](#).

Policy numbering and titles in the Regulation 19 (Reg 19) Local Plan Submission document have been updated and adjusted since the Regulation 18 (Reg 18) Plan and therefore different to the numbering that this report is based upon. There are tables and notes in orange colour text throughout this document which cross reference the new Reg 19 plan policy titles to assist with referencing back to the Reg 18 policy comments.

PART A – Representations made on Local Plan Document

Chapter 1 Introduction and Chapter 2 How do I get involved

Representations on Chapter 1

In total 12 representations were made on this chapter by 10 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mrs Sue Ward		DLP245
Robert Marshall		DLP488
Derek Leach	The Dover Society	DLP2974, 2976,3068
Dr Raju		DLP610
Sarah Slavin		DLP778
Mr Kevin Lynch	Worth Parish Council	DLP1859
Mr Kevin Lynch	Sholden Parish Council	DLP1879
Mr Guy Bates		DLP938
Keith Holness	Nonington Parish Council	DLP2152
Mrs Emma Doherty		DLP1273

Summary of Representations – Main Issues

Many of the comments made in this section were more relevant to a specific area / topic / policy within the plan and therefore have been responded to in that section:

- DLP245 and DLP938 – addressed in Spatial Portrait.
- DLP3086 and DLP9938 – addressed under SP2
- DLP3068 and DLP938 – addressed in Employment and Economy Chapter
- DLP938 – addressed in DM22
- DLP2152 – addressed in Evidence Base responses

Local Democracy comments

- It is undemocratic for the draft local plan to be referred to at planning committee prior to completion of all consultations on the draft local plan. (DLP610)
- No mention of the principles of local democracy. The draft needs a strategic policy which supports NPPF 9 which states, amongst other things, that DDC: "...take local circumstances into account". Currently many parts of the draft make it a development charter rather than a Local Plan supporting and reflecting the legitimate evidence-based, democratic needs of the local communities. (DLP1859, 1879)

Council's response

The Local Plan, even in draft form, becomes a 'Material Planning Consideration' which should be considered when assessing planning applications. Local Plans generally hold more 'weight' in decision making terms the further along the process to adoption they are. However, what weight each material consideration is given is

purely an assessment for the decision makers, in the case mentioned above, the Planning Committee. More information can be found in national guidance.¹

With regards to taking into account local circumstances and evidence, this plan is supported by a range of local evidence which has guided the Local Plan approach. The plan, and the evidence will be available for public consultation at various stages of production and the Independent Examination will ensure that all legal requirements for consultation and democratic process have been adhered to.

Representations on Chapter 2 – How do I Get Involved?

Name	Organisation	Comment ID
Sarah Hixon		DLP2520
Susan Borland		DLP2275
Mr Neil Fielder		DLP2276
Paul Gamble		DLP2702
Derek Parker		DLP2278
Mr Keith Playforth		DLP2277
Martyn Halls		DLP2895
Mrs Lynn Regan		DLP198
Mrs Lynn Regan		DLP199
James Moore		DLP3239
Mrs Daryl Leddy		DLP2618
MR. Malcolm Sim		DLP2776
Muriel Sim		DLP2777
Elizabeth Stephens		DLP2279
Roger and Chris Cumes		DLP2455
Mrs Susan Taber		DLP407
Mr Lee Gammon		DLP2457
Judith Hawarden	Hawarden farming	DLP2903
Elizabeth Neaves		DLP3218
Mrs Jean Ross		DLP1395
Mr Stephen Addis		DLP1341
Ms Siobhan Kingston		DLP2627
Penelope Wilson		DLP2400
Guy Maginn		DLP2620
Sue Lamoon		DLP2964
Clive Chandler		DLP2971
Derek Leach	The Dover Society	DLP2977
Mrs Samantha Turk		DLP2595
Mr Jamie Pout		DLP516
john Sharvill		DLP2784
Alex Child-Villiers		DLP2366
Mr Robert Edmond		DLP2518
Mrs Charmaine Perrin		DLP3179

¹ [Determining a planning application - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

John Horsfall		DLP2435
Tracy Jemmett		DLP2489
Mrs Jean Ross		DLP1398
Mrs Rosemary May		DLP2678
Jerran Bailey		DLP2283
Mrs Tallulah Murphy		DLP3487
Trish Bullman		DLP2340
Mrs Susan Sullivan		DLP2656
Mr Bruce Brenchley		DLP2322
Mark James		DLP665
Wingham Conservation Group	Wingham Conservation Group c/o Peter Weatherhead Planning	DLP3176
Mrs Janet Dray		DLP3390
Irene Collins		DLP2377
Brian Short		DLP2781
Gail Short		DLP2782
Jill Cliff		DLP2409
Jill Cliff		DLP2413
Cllr Mike Sole		DLP2427
Della McLean		DLP2687
MRS Abi Hamsher		DLP3486
Beryl Bracegirdle		DLP2313
Mr Peter Brooker		DLP2326
Mrs Elizabeth Hayes		DLP348
Sara Collins		DLP2431
Miss Sharon Barnes		DLP2289
Idris Mehmet		DLP2290
Charlotte Rogers		DLP3047
Ms Angela Hathaway		DLP2899
Susan Brearley		DLP2321
Mrs Lynn Regan		DLP3143
Howard Marshall		DLP2438
Jennifer Comley		DLP2441
Anita Hoskins		DLP2931
Rosalind Cox	Womenswold Residents	DLP2448
Yvonne and Norman Balch		DLP2284
Anne Ballinger		DLP2285
Mr Kyle Banger		DLP2286
Julie Keeler		DLP2292
Duanne Poppe	Ringwold with Kingsdown Parish Council	DLP1834
Ms Juliet Need		DLP3217
Rosie Rechter		DLP842

Ms Sarah Gleave	Dover and Deal Green Party	DLP3696
Stuart Taylor		DLP2610
Mr Joe Dray		DLP2505
Christopher & Kim Finch		DLP2537
Susan Foster		DLP2672
Chris Rooke		DLP2957
Dr Sharon Danby		DLP928
Mr Kevin Lynch	Worth Parish Council	DLP1853
Pete Meiners		DLP3226
Mr Kevin Lynch	Sholden Parish Council	DLP1874
Bruce Laird		DLP3467
Peter Mason		DLP3112
Kim Horwood		DLP3479
Mr Eddie Beak		DLP2280
Emily Smith		DLP3539
Jenifer Wakelyn		DLP2582
Alex Bardsley		DLP2287
Mrs Lorraine Young		DLP2379
Kerry Bardsley		DLP2288
Darren and Camilla Bedford		DLP2291
Shaun Williams		DLP2383
Mrs Jan Griffin		DLP2874
Lynda Friend		DLP3516
Mr Edward Higham		DLP2624
Carlie Wilcock		DLP2884
Mrs Susan Gammon		DLP2706
David Fleck		DLP2689
Richard Clements		DLP2406
Gerald Irvine		DLP2947
Lorna List Brain		DLP2319
Patricia Macfarlane		DLP3088
Iona Dubieniec		DLP2509
Olivia Marchione		DLP3092
Mrs Christine Oliver		DLP1070
Mrs Christine Oliver		DLP1069
Michael Davies		DLP1118
Gary Ransley		DLP3150
Celia Ransley		DLP3152
Anne-Marie Martin		DLP3099
Robert Hogben		DLP2912
John Symonds		DLP2643
Ben Brothwell		DLP2327
Catherine Stone		DLP2744
Jay Psaila		DLP3164

Mr Timothy Stone		DLP2714
Jonathan Stone		DLP2715
Jonathan Pond		DLP3167
Lynn Moorlen		DLP3240
Kathleen Corbett		DLP2443
James Leah		DLP2073
Anne Anderson		DLP2281
Jade Andrews		DLP2282
Martin Garside		DLP2721
Fiona Clark		DLP2375
C Smith		DLP167
Isobel Wiseman		DLP2380
Kerry Williams		DLP2382
Douglas Smith		DLP2763
Keith Holness	Nonington Parish Council	DLP2174
Georgina Davis		DLP2468
T McColm		DLP2470
Mariya Deschamps		DLP2473
Steve Skinner		DLP2766
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP2357
Terence Jones		DLP3555
Lynne Nazareth		DLP3556
Martin Frawley		DLP2654
Mark Deschamps		DLP2480
Andy Tee		DLP1281
Mr Phillip Deschamps		DLP2481
Jolene Frawley-Bailey		DLP2694
Mrs Christine Newell		DLP1333

Summary of Representations – Main Issues

Comments made in this section mainly relate to the public consultation methods and are summarised below:

- Difficulties with locating/navigating the consultation portal to view the Local Plan or make comments – including technical difficulties when trying to submit a comment and/or use a tablet. Concerns raised that the document was purposefully made difficult to access and make comments.
- Concerns that the consultation was poorly advertised by DDC and residents only knew from other sources – not all residents have online access. All residents should have been directly written to.
- Engagement not early enough in the process, DDC haven't shared these plans early enough or for long enough with residents.
- Significant level of concern and comment that the consultation period is being held during the Covid-19 pandemic – making it very unfair to residents that do

not have internet and cannot access the libraries at this time and for communities that cannot meet up to discuss the plans

- Consultation period is too short and should be extended
- Concern that there is too much information to view and comment on in 8 week time period
- Concern that neighbouring district Councillors were not directly informed
- Unfortunate that the Local Plan group (PAG) for community representatives (Dover Society, Deal Society, KALC) was dispensed a year before Reg 18.
- No provision for large print documents or those with visual impairment.
- Too much planning jargon and not plain English.
- Several comments were supportive of the consultation methods such as Q&A sessions, interactive maps.

Some comments made in this section related to specific chapters or sites in the Regulation 18 Local Plan and not the introduction, and therefore have been responded to in the relevant section of this report.

Council's response regarding public consultation

The concern about limited public involvement in the preparation of the Plan a Regulation 18 stage is noted but comments are unfounded. The Regulation 22 consultation statement which will support the Plan at Regulation 19 consultation outlines the numerous virtual and written engagement events undertaken with local residents, town and parish councils, communities and stakeholder interests from as early as 2018, and the advertisement of the Local Plan Reg 18 formal consultation in full detail.

The extent of local consultation and advertisement has constituted a robust approach to meeting Regulation 18 and is in accordance with the national requirements for consultation and meets the adopted Statement of Community Involvement². All formal requirements for consultation on Regulation 18 stage set out under Stage 1 – Prepare Development Plan (Page 8) were met.

With regards to the Covid-19 pandemic, the government issued a Written Ministerial Statement in January 2021³ urging the preparation of Local Plans to continue to progress to help ensure the economy could rebound from the pandemic. In addition, they made changes to the Town and Country Planning (Local Planning) (England) Regulations 2012, under the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020, to remove the need for local authorities to make hard copy documents available for public inspection for a temporary period from 16 July 2020 until 31 December 2021⁴. This removed the optional requirement of the SCI to place hard copies in the inspection points and also impacted on the ability to undertake the optional exhibitions during that time.

² [Planning-SCI-2019-update-WEB.pdf \(dover.gov.uk\)](#)

³ [Written statements - Written questions, answers and statements - UK Parliament](#)

⁴ [Coronavirus \(COVID-19\): planning update - GOV.UK \(www.gov.uk\)](#)

In light of these limitations, the consultation period was 2 weeks longer than the standard requirement, and the Council provided numerous ways to make comment on the plan, including through the online portal and via email or letter. There was also a dedicated phone number which allowed residents to call for assistance with finding the correct information and using the portal. This also enabled residents to call to request hard copies of the plan, or for documents in different or accessible formats such as large print. The Council also undertook a range of alternative additional advertising of the Local Plan consultation, for example through posters in a range of settlements.

It is acknowledged that some residents have had technical difficulties with the online portal, and the council will endeavour to provide more detailed and plain English guidance to using the portal for future consultation events. However, due to the amount of representations received during the consultation on the portal and via email, it is clear that many residents were aware of plan, were able to make comment and had access to the specific online events which were published on the council's website, in the local press, on posters throughout the district in key settlements where site allocations were proposed and on social media. Free hard copies were also available for residents on request to those that did not have internet access.

With regards to involvement in the Local Plan Project Advisory Group (PAG) meetings, the membership list of this was updated prior to Regulation 18 stage to internal officers and elected Councillors only which is due to the potential conflicts and limited representation of only selected members of the public having access to confidential information which had not been agreed or approved for wider public consultation. This is standard Local Government procedure.

There has also been on-going and regular engagement with key local service providers to ensure that the Plan was deliverable and the supporting Infrastructure Delivery Plan/Schedule is accurate and up to date as possible.

Chapter 3 Spatial Portrait

Representations made on the chapter

In total 16 representations were made on this chapter by 15 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP5
Mr Nigel Wadey		DLP254
Derek Leach	The Dover Society	DLP2978
Mark James		DLP666
Kelly Lawrence	Deal Town Council	DLP2176
Mrs Samara Jones-Hall		DLP801

Brenda O'Neill		DLP818
Mr Jason Jones-Hall		DLP827
Rosie Rechter		DLP850
Ms Sarah Gleave	Dover and Deal Green Party	DLP3697, DLP3726
Mike Eddy	Walmer Parish Council	DLP1697
Mrs Sally Waite		DLP989
Barbara Cooper	Kent County Council	DLP1704
Sara Gomes	Environment Agency	DLP1530
	Dover Town Council	DLP1149
Mr Adam Wadey		DLP1287

Summary of Representations – Main Issues

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Page 11 (3.3). Geography. Manston Airport is shown. Currently this is not an operational airport.	The most recent DCO has confirmed that Manston's legal use is as an airport.
The Local Plan admits that the bulk of the in-migration is made up of people who are middle-aged or older. It is more coy, not to say silent, about the loss of younger people from the area.	The Draft Local Plan relies on evidence presented in the Strategic Housing Market Assessment (2017, updated 2019) for the overall mix of housing types required in the District over the Plan period, and a policy setting out the required mix will be included within the Reg19 Local Plan, based upon the latest available evidence. The Draft Local Plan also proposes a higher economic growth scenario, providing an aspirational but realistic level of economic growth, based on analysis of the key strengths and opportunities of the District. These factors seek to improve the attractiveness of the District as a place for young people to live and work.
It would have been more helpful to have the population figures for the individual areas (such as villages). I have had to research	The next version of the plan will set out the proposed distribution and amount of development

<p>myself in order to better inform me to comment on some of the later sections, in particular the housing proposals. Lumping all rural areas under one umbrella (as it does with the percentage growth in paras 3.15 and 3.17 on page 15) disguises the real impact on the individual areas / villages / communities. If the major towns can be listed separately then so should the individual villages.</p>	<p>across the district and % of growth by settlement area (either within the Plan or within supporting documentation).</p>
<p>Page 13 (3.9) Health Dover Town has a high level of deprivation affecting health and inward investment. Of major concern is all Dover Town wards are in the top 20% of deprived wards in England, including two Dover wards in the top 10%.</p>	<p>The Spatial Portrait provides a summary of key health and deprivation indicators, which are then addressed, where this is possible through Local Plan policy, in subsequent chapters.</p>
<p>This section covers a number of health indicators but would have been better entitled “Deprivation”.</p>	<p>Noted.</p>
<p>The County Council notes the reference to cross boundary issues and would draw attention to key issues such as addressing climate change mitigation and adaptation, biodiversity decline and water resources (including waste water) that all require joined up working to seek sustainable solutions. The County Council would welcome discussions as to how the Local Plan will influence development and landowner investments to improve water resources, reduce wastage and how groundwater resources may be better protected.</p>	<p>Partnership working with KCC (as LLFA), Environment Agency and other Kent LA’s under the Duty to Co-Operate will progress joined up working and seek sustainable solutions to issues affecting the climate and water environment</p>
<p>We note that the words used by the ‘Planning, Regeneration and Development’ department refer to ‘a strategy and action plan with an aspiration that the Council will become a net zero carbon emitter by 2030’ are weaker than those minuted 29 Jan 2020, when Cllr Barlett (leader) moved, and Cllr Mills (leader of opposition) seconded the declaration of a Climate Emergency, declaring council would produce ‘a Climate Change Strategy with the intention of the Council becoming a net zero carbon emitter by 2030 at the latest.’ (item 52). We recommend that DDC Planning, Regeneration and Development department</p>	<p>Replace “with an aspiration to” to “with the intention of” to match Council declaration of Jan 2020</p>

respect the words of the minuted democratic decision, instead of watering it down. (
In paras 3.13 and 11.58 the statistic from the Kent Environmental Strategy dates from 2012-13. A more up to date figure is considered in the Water Cycle Study para 1.2. It is less than the national average (which in 2019-20 was 140 litres per person per day) largely because of compulsory metering in the area.	Water Cycle Study and references to it will be updated
So many homes should not be allowed to remain vacant.	Comment noted. The planning system does promote and support the development of under-utilised land and buildings and the Local Plan policies are positively worded to this effect to enable this to happen in appropriate circumstances.
If there aren't enough jobs, we don't need so many houses.	The NPPF (2021) requires Local Authorities to plan for the minimum number of homes needed, based on the Standard Method Calculation set out in national planning guidance. To provide for less homes than the objectively assessed need would be considered contrary to the NPPF as set out in para 6.18
The programme of house building envisaged by the document seems designed more to satisfy the needs of older people moving into the area rather than being aimed at helping to retain younger people in the district.	The Draft Local Plan relies on evidence presented in the Strategic Housing Market Assessment (2017, updated 2019) for the overall mix of housing types required in the District over the Plan period, and a policy setting out the required mix will be included within the Reg19 Local Plan, based upon the latest available evidence at the time.
We note that internal migrants to Dover are likely to be middle-aged and older, and will probably require (as the local aging population does), small bungalows rather than executive 4 bedroomed homes	The Draft Local Plan relies on evidence presented in the Strategic Housing Market Assessment (2017, updated 2019) for the overall mix of housing types required in the District over the Plan period, and a policy

	setting out the required mix will be included within the Reg19 Local Plan, based upon the latest available evidence at the time.
We note that there was a gross imbalance 2010 – 2019 with lower housing growth where it is urgently needed in Dover (29%) and overdevelopment on Greenfield around Deal/Walmer urban area (31%) and Aylesham. There is concern that Deal / Walmer have seen 2019 – 2021 more planning permissions granted at a pace which is causing serious public concern about the ensuing serious congestion and drainage problems.	The Council's future housing growth strategy seeks to address past issues around deliverability, caused primarily by the allocation of a large number of brownfield sites in Dover Town and progress on delivery at Whitfield being slower than expected, by relying upon the settlement hierarchy, and is also influenced by site availability, environmental constraints and factors of delivery.
In Fig. 3.2 the proportion of second homes is given as 2.3% but in the text immediately above the percentage is given as 2.1%.	Noted.
The clear conclusion of this section, taken with the section on population, is that there is a need for social housing stock and that there are vacant properties which can provide some of the commercial housing needs if released by owners.	Noted
I couldn't see any reference in the plan to tackling the issue of there being higher second home ownership than in many Kent LA's nor the issue of vacant and long term dwellings. Just because the latter are in line with county and national averages it doesn't mean something shouldn't be done. If action is not started now then the problem becomes worse with ultimately are community being hollowed out as in parts of the West Country.	Noted. The planning system has limited powers with regards to enforcing second home ownership or AirBnBs for example, particularly where they are brought forward under permitted development rights. The issue is national, rather than local.
3.12 -States that CO2 emissions from the domestic and transport sectors have been resistant to reduction. Yet the plan proposes allocation of a very large swathe of greenfield land North of Nursery Lane in Whitfield for housing development. This area contains no local job market and Dover itself is a net exporter of labor as stated in 3.27. This rural area is also not supported by any public transport network. This development would force reliance on personal vehicles, lengthy	The NPPF (2021) requires Local Authorities to plan for the minimum number of homes needed, based on the Standard Method Calculation set out in national planning guidance. To provide for less homes than the objectively assessed need would be considered contrary to the NPPF as set out in para 6.18

<p>commutes and increase car emissions in the area. This proposed location directly contradicts DDC's strategy for emissions reduction, and Strategic Policy 1 which seeks to 'discourage the use of the private car'. This allocation of new homes should be transferred to other councils (such as Canterbury, Folkestone or Hythe districts), whose jurisdictions contain strong labour markets, to minimise the need for harmful commuting.</p>	
<p>States that Dover District currently contains 1,448 vacant dwellings. How can DDC justify development of large swathes of greenfield land, such as that proposed North of Nursery Lane in Whitfield, which carries a vast negative environmental impact, when so many dwellings remain vacant in the area?</p>	<p>Noted</p>
<p>3.27 Reference is needed here to internal commuting within the district. The tidal flow of traffic out of Deal in the morning towards Dover and Sandwich and back again in the evening has a significant impact on the road network's ability to absorb additional development and the need for new traffic distributor road(s).</p>	<p>Commuting patterns described in 3.27 are consistent with the flows towards Dover and Sandwich described as internal commutes</p>
<p>3.27 The houses should be built where the jobs are to save travel, time, congestion and pollution. ie. in Canterbury, Folkestone and Hythe, where the jobs are. We suggest that there is also a considerable extent of hidden un / under / precarious employment in Dover. Three wards in Dover town area are in the 10% of most deprived wards in the country.</p>	<p>The NPPF (2021) requires Local Authorities to plan for the minimum number of homes needed, based on the Standard Method Calculation set out in national planning guidance. To provide for less homes than the objectively assessed need would be considered contrary to the NPPF as set out in para 6.18. In addition the Local Plan seeks sustainable development through spatial strategy that considers the settlement hierarchy and level of service provision.</p>
<p>Similarly, though the levels of educational attainment have improved, there appears to be no intention of using the Local Plan to improve that position further by, for example, specific policies to encourage higher</p>	<p>The plan is supportive of educational facility growth but the issue of attainment is largely outside of the scope of the plan.</p>

education establishments to develop facilities in the district, and thereby to develop a knowledge based economy beyond the former Pfizer's site. This would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.	
I am surprised that this plan seems to take no account of the impact of Brexit and the pandemic of COVID o this district	The revised plan will acknowledge both these issues.
Additionally , one of the areas main sources of income , tourism, will founder if the area is reduced to one vast housing estate.	Proposals for Tourism and tourist/visitor accommodation are covered by DM Policy 24.
We note that Dover became a net exporter of labour 10 years ago and residents commute to Canterbury, Folkestone, Ashford and London. This has implications, and we recommend, a) that Planning + Regeneration + Development officers work rapidly to understand the local employment opportunities on rural farms and woodland within the district that are presented by the need for local food security, and agro-forestry. Green New Deal job strategies (originating in UK report in 2008), are being taken up in the USA at scale, at pace, in 2021.	Conversion or Rebuild of Rural Buildings for Economic Development Purposes is covered by DM Policy 22, and DM Policy 23 covers new employment development in the countryside.
There is little in the Plan which indicates any urgency in tackling the lack of skills.	This issue is largely outside scope of Local Plan but it will encourage development of education and commercial opportunities.
3.30 A figure for the percentage of trade by volume would be helpful here as well to give a fuller impression of the lorry movements the road network has to cope with.	Proposed change: Include figure on trade by volume
Road Traffic accident statistics are worrying and will be exacerbated by a huge increase in new houses at Whitfield. Singledge Lane, a narrow single track road, will become very dangerous with the increase in traffic	New connections to the A2 and A256 are to be provided as part of the wider programme of development at Whitfield, which will ease pressure on existing roads. Highway Safety is covered by DM Policy 29 and contributions towards A2 improvements for sites

	in close proximity are covered by Strategic Policy 14.
Pollution will also increase	DM Policy 41 addresses air quality issues
The district is described as being “highly accessible by rail, road and sea”, whilst it also claims that the district has high speed rail connections to London, when the reality is that HS1 trains pass through the district and are high speed only from Ashford.	High speed rail services have significantly reduced journey times to London, and the Council is pressing for this to be reduced to 1 hour from Dover to St Pancras. No action needed on removing High Speed Refs
There is no discussion of the capacity of the A roads within the district or of other forms of transport at this stage in the document, nor is there mention of the problems caused by cross-Channel transport delays to communications in the immediate hinterland.	Consultation will take place with Kent Highways as the Highways Authority on all these issues.
The passage about transport seems very much at odds with the lived experience. HS1 trains travel through the district but are not high speed. The principal road system, terminating at the port of Dover, is subject to delays during bad weather or other exceptional circumstances, and the local roads are inadequate, though not as inadequate as public transport or cycling provision.	High speed rail services have significantly reduced journey times to London, and the Council is pressing for this to be reduced to 1 hour from Dover to St Pancras. No action needed on removing High Speed Refs
The projection of new homes to be built I consider wholly unrealistic as the infrastructure to support them is simply not there, and some of it never could be, ie water, roads , suitable green field sites if biodiversity are to be maintained. We also recommend that where labour has not shifted to home-working in the post-covid context, clean commuter options are delivered speedily	Consultation will take place with all infrastructure providers to ensure the Plan and supporting IDP have sufficient infrastructure planned to meet the needs of the future growth.
Paragraph 3.30- This section refers to the A2 and A20 providing good quality links to Kent and beyond. However, it is also important to highlight the existing infrastructure constraints within the A2 corridor and A256, which may become a natural barrier to growth in the	Consultation will take place with Kent Highways as the Highways Authority on all these issues.

<p>future in the absence of further strategic infrastructure provision.</p>	
<p>The County Council recommends that the Plan makes reference to the County Council's Rights of Way Improvement Plan (ROWIP) (2018-2028) and the importance of the Public Rights of Way (PRoW) network, and the benefits and opportunities that this network brings – including connectivity for rural communities and employment and leisure opportunities. The PRoW network in Dover features a large part of the England Coast Path National Trail, the North Downs Way National Trail and county wide promoted routes, such as the White Cliffs Trail and the Miners Trail. The Local Plan should support the PRoW Network, as the provision of high-quality walking, cycling and equestrian infrastructure will enable the public to explore Kent's countryside and support the rural economy.</p>	<p>Comments noted. References will be made in the plan to the PROW network.</p>
<p>3.30 - SHOULD be highly accessible but the road network in and around Dover Town is heavily congested and not fit for the volume of HGVs using the Channel freight ferries.</p>	<p>Consultation will take place with Kent Highways as the Highways Authority on all these issues.</p>
<p>The brief introductions to the natural and historic environments lack ambition despite the references to their national and international importance which could be taken advantage of in order to strengthen both the knowledge based and tourist economies.</p>	<p>No change proposed</p>
<p>There are missed opportunities to join up the dots linking Chap 5 and Chap 7 and Chap 11, and show a genuine understanding of how our existing natural capital is an essential and invaluable component without which it will be impossible to meet the climate change mitigation targets that we must meet if our children are not soon to live in deprivation and danger. (especially in a district whose 70% rural economy is well-placed to meet the needs of the post-brexite, climate emergency, post-covid world).</p>	<p>Improved links made between chapters 5, 7 and 11</p>

Summary of Proposed Changes

- Deprivation reference will be amended to Health and Deprivation
- Water consumption figures will be updated

Chapter 4 – Vision and Objectives

In total 69 comments were made on the Vision and Objectives chapter. A summary of the representations received and the council's response to these representations is set out below.

General Representations on the Chapter

In total 12 general representations were made on this chapter by 8 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Brooker		DLP3374
Brenda O'Neill		DLP831
Hazel Groves	Christians Together in Dover	DLP1001
Mark Norcliffe		DLP1063
Hume Planning	On behalf of Carl Thomason Sunning Dale	DLP3604
Hume Planning	On behalf of Green Oak Farm Ltd	DLP1626
Hume Planning	On behalf of Mr and Mrs Mullaney	DLP1629
Cllr Edward Biggs	Dover District Council Town and Castle Ward	DLP1996
Rupert Bates		DLP1308
Julie Davies	CPRE	DLP812
Derek Leach	The Dover Society	DLP2974
Guy Bates		DLP938

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Three representations support this chapter	Comments are noted and welcomed.
Plan only focuses on meeting the needs of the NPPF	The policies of the Plan respond to the needs of the

	district over the Plan period while complying with national legislation, policy and guidance.
<p>Believe that aspiration and objectives of the Plan could go further and include a greater emphasis on what other stakeholders might be able to achieve in partnership with the District Council.</p> <p>The scale of the plan does not enrich the landscape, nor will it provide significant opportunities for the young.</p> <p>The plan does not provide a plausible solution for providing the inhabitants of 11000+ new homes with long term employment.</p> <p>Should focus more attention on improving what facilities, services, amenities are already in existence rather than on growing the housing population.</p>	The protection of landscapes, provision of employment land, involvement of other stakeholders, the provision of facilities and other infrastructure are matters for later chapters of this Plan.
Object to the scale of the proposed housing developments and do not believe they address the structural needs of the area	The scale of housing development is set by central government. The methodology is based on the objectively assessed housing need of the district.
Port traffic should be segregated from the town.	The location of the port and the nature of highway network make this difficult to deliver.
Plan is ambitious but doesn't address delivery of such ambitions	The delivery of the ambitions set out in this Chapter is addressed by the Policies in subsequent topic chapters.

Representations on the Overarching Vision

In total 40 representations were made on this section by 34 consultees. Representations were received from:

Name	Organisation	Comment ID
Julie Davies	CPRE	DLP812
Sarah Gleave	Dover and Deal Green Party	DLP2729

Lee Stampton		DLP3501
Carolyn and Trevor Bond		DLP2302
Richard Barry		DLP64
Ross Miller	Masterton Robin Designs Ltd	DLP95
Mrs Lynn Regan		DLP201
Mrs Sue Ward		DLP246
Nigel Wadey		DLP255
Derek Leach	The Dover Society	DLP2979
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1863
Mrs Susan Sullivan		DLP3648
Mark Burton		DLP772
Katie Miller	Kent Downs AONB	DLP1467
Kelly Lawrence	Deal Town Council	DLP2131
Rosie Rechter		DLP851
Rosie Rechter		DLP853
Jason Jones-Hall	Pioneering Places East Kent	DLP871
Jason Jones-Hall	Pioneering Places East Kent	DLP873
Alan Bryne	Historic England	DLP1642
Peter Cutler	Friends of Betteshanger	DLP2081
Bruce Laird		DLP3466
Mike Eddy	Walmer Parish Council	DLP1969
Gerald Irvine		DLP2948
Gerald Irvine		DLP2949
Gerald Irvine		DLP2950
Mrs Christine Oliver		DLP1072
Barbara Cooper	Kent County Council	DLP1705
Nathan Burns	Natural England	DLP1427
Ms C Smith		DLP1139
Patrick Murfet	Bee Equipment Ltd	DLP1170
Keith Holness	Nonington Parish Council	DLP2175

Nicky Britton-Williams	Kent Wildlife Trust	DLP1498
Paul Groves		DLP2880
Paul Groves		DLP2881
Dover Town Council	Dover Town Council	DLP1152
Ms Penelope James	Dover and Deal Liberal Democrats	DLP1038
Jason Ransley	Dover Harbour Board	DLP810
Jason Ransley	Dover Harbour Board	DLP1214
Luke Copper	Barretts	DLP3628

Summary of Representations – Main Issues

Summary of Representations	Council’s Response – Proposed Changes
8 representations support the Overarching Vision	Comments noted and welcomed.
Reads like a Wishlist that could apply to any Council. This section is over-aspirational and lacking in detail.	The Vision is, by its very nature, aspirational.
Plan must look beyond its current remit and should consider Climate change sea level rise well beyond 2100. Planning for the future of our urban centres to survive this inevitable climate disaster need to be at the heart of this Plan with all other issues being of a secondary nature. The overall ‘Vision’ makes no mention of Climate Change or the Ecological crisis. Tackling both of these should be fundamental to any future plans and part of the overarching vision and should be embedded throughout the Local Plan. It is erroneous to claim that “the climate change emergency will have delivered increased opportunities for local food production, extensive tree planting and the adoption of sustainable design”. The climate emergency will allow for changes to local food production but, if measures are not taken through the Plan to safeguard and enhance water supplies and storage, it is more likely to reduce local food production.	The Vision has been re-ordered and amended. The significance of the climate emergency and the need to embed initiatives to mitigate against, and adapt to, the impacts of a changing climate in the Plan, have been given additional emphasis.
The environment needs to be priority number one - it is possible to have a prosperous green economy: to lead the way in renewable energy and retrofitting our existing housing stock, to invest in a green health and	The Vision has been re-ordered and amended. The importance of the natural environment to the future of the District, has

<p>social care sector, to build best-in-class, zero carbon homes that are affordable and desirable.</p> <p>Instructive that Spectacular and Sustainable Environment is the last, rather than the first, of the aspects of the Plan's Vision.</p>	<p>given appropriate priority and additional emphasis.</p>
<p>Vision is laudable and difficult if not impossible to argue with, but it is heavily reliant on market forces not only providing businesses but also demand and as such is outside of local authority control, at best you can encourage and facilitate. There is however no mention of how you will do this or how you propose enabling communities to actively participate in both the creation of place and the economic development of those places.</p>	<p>The delivery of the Vision, and in particular, how the market will be required or encouraged to enable delivery, is set out in the Policies of the Plan.</p>
<p>The "enhanced network of dedicated walking and cycling routes" should include horse riders, who are very poorly catered for in comparison to other areas of the South East.</p>	<p>Comments noted.</p>
<p>With a low income community, the town of Dover will only prosper from "imported" income with tourism of paramount importance. Tourists will only stay in Dover if the as stated "High Quality accommodation, attractions" are delivered.</p>	<p>Comments noted.</p>
<p>The view expressed in the Plan of infrastructure in general and transport in particular is very much at odds with the lived experience of residents and users. A more realistic portrayal of the problems of co-existing with the modal shifts required by transport locally would give greater confidence in the ability of the Plan to deliver the objectives and the vision</p>	<p>Comments noted.</p>
<p>The 4 aspects of the Overarching Vision are altered for listing of the strategic objectives which become Prosperous Economy; Vibrant Communities; Spectacular and Sustainable Environment, and Cross Cutting Issues.</p>	<p>Ordering and wording of the strategic objectives will be corrected to align with the sections of the Vision.</p>
<p>The overarching vision does not go far enough in reflecting the national, regional and county-wide strength of digital, creative and cultural development and its importance both for economic regeneration and community development</p>	<p>Reference will be added to the role of digital, creative and cultural development in growing the local economy over the Plan period.</p>
<p>The vision for Dover should include enhanced connectivity for walking, cycling and equestrian activity across the District, with a range of sustainable transport options available for the public and opportunities to access high quality open space.</p>	<p>The Vision already includes reference to connected walking and cycling routes. Reference added to publicly accessible open spaces in the urban areas of the district.</p>

<p>Encourage references to sustainable living and stewardship of world class landscapes.</p> <p>In addition to the protection and enhancement of habitats, include the creation of a coherent ecological network within the vision, to promote increased extent and connectivity of habitats within the District, in line with the Governments 25 Year Environment Plan and the upcoming Environment Bill.</p> <p>To reflect national policies relating to the natural environment the vision should seek to enhance the natural environment throughout urban areas, as well as rural areas. Creation, enhancement and retrofitting of high- quality green infrastructure will play a key role in establishing urban areas as desirable places to live and work, whilst contributing to the government’s commitment to achieve a nature recovery network.</p> <p>Strategic planning of Local Nature Recovery Strategies will be fundamental to informing development and biodiversity net gain delivery and thus should underpin the vision.</p>	<p>The Vision already includes reference to world class landscapes and thriving natural environments. The importance of creating a coherent ecological network and delivering a net gain in biodiversity are addressed in the Strategic Objectives.</p>
<p>Include Dover in the list of distinctive historic town environments.</p>	<p>The rich heritage of the town of Dover, which as the principal settlement of the District is the first of the three tiers of settlements addressed in the Thriving Places section of the vision, is already acknowledged in the Vision. The word built has been added to make this clearer.</p>
<p>Concern is raised regarding the reference to local design codes. Whilst the notion behind a local design code is supported to ensure that development is seamlessly integrated into the existing built form, it should be noted that design codes can also be overly restrictive. It is noted that the Draft Design Policies do not include reference to design codes and instead reference a Local Design Guide which is considered more appropriate.</p>	<p>Policy PM1 commits the Council to the production of Local Design Codes for areas of the District where significant development is proposed.</p>

Summary of Proposed Changes

- The Vision and its introductory paragraphs will be amended.

- The importance of the rich natural environment to the future of the District, and the need to embed initiatives to mitigate against, and adapt to, the climate change emergency in the Plan will be given additional emphasis.
- Ordering and wording of the strategic objectives will be corrected to align with the sections of the Vision.
- Other issues raised are addressed in other parts of the Plan.

Representations on the Strategic Objectives

In total 17 representations were made on this section by 17 consultees. Representations were received from:

Name	Organisation	Comment ID
Rev Seth Cooper		DLP332
David Leach	The Dover Society	DLP3695
David Stewart		DLP611
Sonja Watsham	East Kent Climate Action	DLP2554
Mrs Susan Sullivan		DLP2660
Katie Miller	Kent Downs AONB	DLP3649
Rosie Rechter		DLP855
Jason Jones-Hall	Pioneering Places East Kent	DLP874
Alan Byrne	Historic England	DLP1643
Mike Eddy	Walmer Parish Council	DLP1966
Ms C Smith		DLP964
Gerald Irvine		DLP2951
Nathan Burns	Natural England	DLP1428
Douglas Smith		DLP2764
Nicky Britton-Williams	Kent Wildlife Trust	DLP1499
Ms Lesley Neil		DLP3212
Julie Davies	CPRE	DLP3698

Summary of Representations – Main Issues

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
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2 representations support the Strategic Objectives	Comments noted and welcomed.
Should include positive references in support of the agricultural element of DDC commerce. e.g. - To support farmers in their work maintaining sustainable agricultural environments and to assist with creating safe and connected rural communities.	Support for the farming community is largely delivered at national level. The policies of this Plan seek to limit development in rural areas to existing settlements, thereby minimising impact on agricultural land and enterprises.
If the Local Authority is to play its part in stemming the unprecedented declines in habitat and species loss, then more ambitious aims will be necessary. Biodiversity should be proactively promoted throughout the Local Plan. It is not enough to protect just designated sites.	Wording will be strengthened so that Strategic Objectives specifically include the objectives of achieving an enhancement in biodiversity and the delivery of a net gain in biodiversity across the district.
Would like sustainability to be considered above all else.	Strategic Objectives will be reordered to reflect the new ordering of Vision and to place Spectacular and Sustainable Environment Objectives at the start.
The current focus of Cross Cutting Issues fails to recognise, and potentially excludes, the potential of cultural and heritage-based regeneration and development.	Cross Cutting Issues will be amended and retitled Thriving Places to match the sections of the Vision.
Amend bullet point 1 Spectacular and Sustainable Environment to reflect that mitigation of climate change means taking action so that the level of climate change is less than it could become and that adaptation to climate change is different, it means taking action so that the expected problems of climate change can be better coped with. Mitigation and adaptation to climate change is a legal requirement is acknowledged at paragraph 5.5, but paragraph 5.24 takes a very defensive attitude to the need for climate change policies. Climate change mitigation and adaptation should be central to land use planning over the Plan period and should be seen in every policy throughout the Plan. First objective of Spectacular and Sustainable Environment is to be commended but it only relates to how new development is built. It does not address the question of how the strategic location of new	Wording will be amended.

development responds to the challenges of climate change.	
Accessible footpaths and bridleways are a must for an integrated low carbon transport system.	Objectives will be added with regard to walking and cycling routes, protected priority species, visitor accommodation and facilities, high quality place making and the climate emergency.
Flooding, alternating with potable water shortages seems to be a growing problem which will only be exacerbated over time. The Stour, and the tributaries that feed it, is our only major river in the district. The creating of freshwater reservoirs by farmers to store agricultural water that may also be used for other purposes, including nature reserves and leisure, must be a priority.	Comments noted. The sustainable management of flood risk including taking opportunities to reduce flood risk where possible is included within the strategic objectives.
Daily contact with nature is linked to better health, reduced levels of chronic stress, reductions in obesity and improved concentration. The provision of high-quality green infrastructure and access to nature should be at the heart of creating vibrant communities and conservation of and promotion of access to nature should be included as cross cutting issues throughout the Local Plan.	The importance of delivering improved health and wellbeing of local residents is already referenced. However, to provide clarification, the role of accessible green infrastructure in the delivery of this objective will be added.
Natural solutions for flood management should be prioritised, to provide multiple benefits in terms of reduced flood risk and benefits for biodiversity. Encourage the council to include the protection and enhancement of locally important habitats and rare and threatened species too.	Objectives will be added with regard to walking and cycling routes, protected priority species, visitor accommodation and facilities, high quality place making and the climate emergency.
The plan needs to have specific and measurable outcomes linked back to the outcomes of the Dover Coastal Towns plan 2017-21. The plan should have stages, such as 2, 5, 10, 15 years, at which points success should be measured and plans amended if need be.	The Dover Coastal Communities Team Economic Development Plan 2017 -2021 forms part of the wide evidence base of the Local Plan.
Second objective of Cross Cutting Issues is welcomed but should be acknowledged that new roads encourage greater vehicular traffic and can be counter-productive in addressing the challenges of climate change.	The challenges of mitigating against and adapting to the impacts of climate change lie at the heart of the Strategic Objectives and the Plan as a whole. The importance of improving connectivity is also a matter for the Plan and its Objectives in the interests of enhanced residential and economic opportunities.

	<p>However, the Plan is read as a whole and the importance of protecting the environment and addressing the challenges of climate change are acknowledged as being of fundamental importance underpinning the Objectives and policies of the Plan.</p>
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Summary of Proposed Changes

- Strategic Objectives will be reordered to reflect new ordering of Vision and to place Spectacular and Sustainable Environment Objectives at the start.
- Cross Cutting Issues will be amended and retitled Thriving Places to match that of the sections of the Vision.
- Objectives will be added with regard to walking and cycling routes, protected species, visitor accommodation and facilities, high quality place making and the climate emergency.

Chapter 5 – Climate Change

In total 306 comments were made on the Climate Change chapter. A summary of the representations received and the council's response to these representations is set out below.

Representations on the Chapter opening

In total 35 general representations were made on this chapter by 33 consultees.

Representations were received from:

Name	Organisation	Comment ID
Dr Ragu Sakaria		DLP613
Sarah Gleave	Dover and Deal Green Party	DLP2730
Iona Dubieniec		DLP2510, 2515
Brenda Gray		DLP2869
Mrs Lynn Regan		DLP203
Mrs Sue Ward		DLP247
Nigel Wadey		DLP256
Reverend Seth Cooper		DLP333
Mrs Susan Taber		DLP545
John Lonsdale		DLP3086
Sarah Slavin		DLP806
Tracy Hawkes		DLP807
Julie Davies	CPRE	DLP815
Rosie Rechter		DLP858
Mrs Sasha Davies		DLP881
Bruce Laird		DLP3463
Laura Fidler	Sandwich Town Council	DLP945
Jon Bradburn	Montagu Evans LLP	DLP1855
Carlie Wilcock		DLP3683
Mrs Christine Oliver		DLP1076
Barbara Cooper	Kent County Council	DLP1706
Nathan Burns	Natural England	DLP1425, 1452

Bridget Fox	The Woodland Trust	DLP1129
Marnie Caton	Sandwich Environmental Conservation Group	DLP3309
Ms C Smith		DLP934
Penelope James	Dover and Deal Liberal Democrats	DLP1003
Chris Shaw		DLP1201
M L Page		DLP1219
Gary Bradbury		DLP1249
Anna Spain		DLP1107
Mrs Caroline Raffan		DLP1272
Adam Wadey		DLP1289
Guy Bates		DLP3727

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Existing trees and hedgerows which are capturing carbon in this decade 2020-2030 and the next 2030 - 2040 must be protected. Replacing existing trees with trees that will only start their carbon capture in 2040 will not increase carbon sequestration capacity or allow the UK or Kent to meet its climate change targets. Important to really start the process of planting more trees in the area now for sequestration.	Tree planting and the protection of existing trees addressed by Policy DM9.
Policies don’t go far enough; this situation needs to be treated as an emergency.	The wording with regard to the climate emergency in this introductory section of the chapter has been strengthened.
Fully supportive of work to reduce the human impact on the environment and commend these ambitions. However, need a transport infrastructure that encourages the use of environmentally friendly transport - e.g. bicycles electric vehicles and public transport including electric buses.	Comments noted. Sustainable Transport and Travel addressed by Policies SP2, DM4 and DM36
needs to be a significant Climate Change Department at DDC, with resources and powers to make a difference	Comments noted.

<p>object to Council's preferred approach for non-residential development to continue to require development to meet BREEAM Very Good instead of higher standards of sustainability. It is noted that paragraph 8.10 of the Whole Plan Viability Report that BREEAM excellent would increase costs by only 2%. The higher standard would help meet Climate Change targets and would aid the Council's Economic Strategy.</p>	<p>Policy DM1 will be amended to require BREEAM Very Good Standard until such time as the Future Building Standard is introduced, which the government currently indicate will be within the early years of this Plan.</p>
<p>Zero carbon by 2050 definitely too late. FHS standards should be introduced now, and BREEAM standard of excellent should be demanded on public buildings.</p> <p>Should be aiming for net zero carbon emissions by 2030 at the latest.</p>	<p>The 2050 target is a national one, set out in the Climate Change Act 2008 (as amended). The Council's Climate Change Strategy reflects this government's objective, whilst also working to become a net zero carbon emitter by 2030 at the latest.</p> <p>Policy DM1 will be amended to tighten the energy-efficiency standards to be required by all new buildings during the lifetime of the Plan. The higher of the two proposed interim reductions in carbon emissions for residential buildings will be required until such time as the Future Homes Standard comes into force, when its emissions reductions (of 75-80%) will apply. This is likely to happen within the early years of the Plan, according to current government advice. In the same way the BREEAM Very Good Standard will be required until such time as the Future Building Standard is introduced, which the government currently indicate will also be within the early years of this Plan. It is considered</p>

	that this represents the best approach to delivering significant meaningful reductions in emissions, within the context of also needing to demonstrate whole Plan viability.
Need to consider the implications of water resources along with climate change, biodiversity and resilience, in order to provide a Plan that considers biodiversity and climate change at this critical time.	Comments noted and addressed by other policies in this Plan.
Any new developments must be flood-risk assessed and avoided in areas of highest risk - whether coastal or inland.	Comments noted. Flood Risk is addressed through the HELAA and Sustainability Appraisal processes and by Policy DM6 of this Plan.
Should include mention of the ability of coastal habitats such as saltmarsh/mudflats etc to sequester carbon or importance of these habitats to help prevent coastal erosion.	Supporting text to Policy DM9 amended to address this issue.
The impact of new housing on water demand can be greatly reduced if the developer was obliged to install rainwater harvesting system on new builds.	Comments noted.
Planning system must take into account the local nature of drainage and the risk of local drainage capacity during heavy rain events and include provisions to allow for new house driveway drainage to be plumbed into SUDS, rather than entering the road drains because it is not intercepted.	Comments noted. Policy DM7 presents the Plan's requirements for the use of SuDS in new developments.

Representations on the key issues identified

In total 16 representations were made on this section by 14 consultees. Representations were received from:

Name	Organisation	Comment ID
Jon Bradburn	Montagu Evans LLP	DLP1862
Mr William Donaldson		DLP133
Mr Nick Eede		DLP186

Ms Fiona Le Ny		DLP222
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1864
Mrs Elizabeth Hayes		DLP738
Rosie Rechter		DLP859
Nicky Britton-Williams	Kent Wildlife Trust	DLP1515, 1500
Sara Gomes	Environment Agency	DLP1541
Kevin Bown	Highways England	DLP1815, 1821
Ms Christine Haggart	Ash Parish Council	DLP1164
Ms C Smith		DLP966
Anna Spain		DLP1270
Derek Leach	The Dover Society	DLP2980

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
4 representations supported the key issues	Comments noted and welcomed.
River and dyke maintenance must become a key part of this strategy otherwise the district will see flooding emulating the middle ages and the diseases and other complications that stagnant water can bring. This also provides natural habitats for a wide range of wildlife and ecosystems which without proper maintenance can be put at risk through stagnant water via organisms such as blue green algae.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Net zero by 2050 is a weak and pointless target and nowhere near enough to protect future generations from the effects of climate change.	The 2050 target is a national one, set out in the Climate Change Act 2008 (as amended). The Council’s Climate Change Strategy reflects this government’s objective, whilst also working to become a net zero carbon

	emitter by 2030 at the latest.
Build more pedestrian crossings and cycle paths.	Comments noted. Sustainable Transport and Travel addressed by Policies SP2, DM4 and DM36
Plan should seek to promote natural solutions to flood mitigation and surface water runoff. Should require that SuDS features provide benefits for both flood mitigation, capture of pollutants and benefits for wildlife.	Comments noted. Policy DM7 presents the Plan's requirements for the use of SuDS in new developments.
Recommend an additional comment to this section with regard to SuDS as follows: The use of SuDS need to be implemented while ensuring that controlled waters are safeguarded to ensure the growing request of drinking water supply is met.	Comments noted.
Strengthen developer contributions for funding towards schemes that can provide customised 'public' transport options that could meet rural needs.	Comments noted. Infrastructure funding addressed by Policy SP13 of this Plan.
Plan should have a Tree Strategy. More tree officers are needed, making use of an increasing number of trained voluntary Tree wardens within in the Dover District who are members of a national tree warden scheme operated by and affiliated to, the tree council.	Comments noted. A Tree Strategy will be prepared to accompany this Local Plan.
Would like to see an action plan where specific land is earmarked for re-wilding and biodiversity.	Alongside the Districts' Green Infrastructure Strategy which accompanies this Plan, an action plan for biodiversity will be delivered, in accordance with the Environment Bill which is currently completing its progress through parliament, through a Local Nature Recovery Strategy and Action Plans which will be prepared at county level.

Representations on the options identified

In total 6 representations were made on this section by 6 consultees.
Representations were received from:

Name	Organisation	Comment ID
Mark Burton		DLP774
Rosie Rechter		DLP860
Jon Bradburn	Montagu Evans LLP	DLP1858
Mrs Sally Waite		DLP992
Dover Town Council		DLP1163
Diana Osborn		DLP3197

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
2 representations supported the options	Comments noted and welcomed.
Provision of future homes standards and sustainable design and construction need to be balanced against other priorities such as provision of affordable housing due to the potential impact upon development viability.	Comments noted.
require the full FHS 2025 and BREEAM Excellent standards to be delivered now	Please see response to the general representations on this chapter with regard to residential buildings standards, BREEAM, FHS and FBS.
Allocate sites to deliver Renewable and Low Carbon Energy Schemes	Comments noted. No sites came forward for renewable energy development during the Regulation 18 consultation. Policy DM3 provides support for proposals to deliver Renewable and Low Carbon Energy Schemes.
Specify Individual Sustainable Transport Measures for each development in addition to a policy which	Comments noted. Policy DM4 requires the

requires solar energy and electric car charging, and communal waste collection facilities in every new development	installation of EV charging points and DM36 addresses issues of sustainable transport and waste in new developments.
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Strategic Policy 1: Planning For Climate Change (Reg 19 Policy SP1)

In total 26 representations were made on this Policy by 25 consultees. Representations were received from:

Name	Organisation	Comment ID
Russell Thompson		DLP2603
Sarah Gleave	Dover and Deal Green Party	DLP3660
Iona Dubieniec		DLP2511
Sonja Watsham	East Kent Climate Action	DLP2555
Mrs Rosemary Clarkson		DLP429
Mr Ian Clarkson		DLP431
Jamie Pout		DLP517
Dr Sharon Danby		DLP637
Mrs Elizabeth Hayes		DLP739
Kelly Lawrence	Deal Town Council	DLP2091
Rosie Rechter		DLP861
Alan Byrne	Historic England	DLP1644
Katie Razzell	Aylesham Parish Council	DLP1925
Mrs Christine Oliver		DLP1096
Barbara Cooper	Kent County Council	DLP1707
Nathan Burns	Natural England	DLP1429
Ms C Smith		DLP1348, 1154
Sara Gomes	Environment Agency	DLP1550
Keith Holness	Nonington Parish Council	DLP2180

Derek Leach	The Dover Society	DLP2988
John Lonsdale		DLP3076
Mrs Christine Oliver		DLP1071
Anne Marie Martin		DLP3100
Marnie Caton	Sandwich Environmental Conservation Group	DLP3310

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Four representations support this policy.	Comments noted and welcomed.
Homes should not have gas heating, we should be promoting heatpumps, renewable energy providers and Passivhaus	Comments noted. Such measures represent ways of meeting the requirements of Policy DM1 and DM2
DDC should aim to reach net zero well before 2050.	The 2050 target is a national one, set out in the Climate Change Act 2008 (as amended). The Council’s Climate Change Strategy reflects this government’s objective, whilst also working to become a net zero carbon emitter by 2030 at the latest.
As Dover is a water stressed area, limits should be imposed on housing to reduce water usage	Comments noted. Policy DM5 imposes higher water efficiency requirements on all new dwellings built over the lifetime of this Plan.
Adopt the FHS 2025 now to ensure housing is as ready as possible to reduce carbon emissions. The government has confirmed that the ability for Local Authorities to set higher efficiency standards for homes is not going to be withdrawn in the medium-term. To support the shared net-zero commitments, the full 2025 Future Homes Standard (a 75-80% reduction in carbon emissions compared to current standard), with a full net-zero target for all new homes brought in by	Policy DM1 will be amended to tighten the energy-efficiency standards to be required by all new buildings during the lifetime of the Plan. The higher of the two proposed interim reductions in carbon emissions for residential buildings will be required until such time as the

<p>2025, should be tested through the plan making process, taking into account the viability context.</p>	<p>Future Homes Standard comes into force, when its emissions reductions (of 75-80%) will apply. This is likely to happen within the early years of the Plan, according to current government advice. In the same way the BREEAM Very Good Standard will be required until such time as the Future Building Standard is introduced, which the government currently indicate will also be within the early years of this Plan. It is considered that this represents the best approach to delivering significant meaningful reductions in emissions, within the context of also needing to demonstrate whole Plan viability.</p>
<p>Need to be significant resources allocated, a coordinated approach and rigorous enforcement. It needs a Climate Change Department at DDC, with powers to make a difference</p>	<p>Comments noted.</p>
<p>Amend policy to ensure that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing greenhouse gas emissions; and to include explicit reference to the Climate Emergency that DDC have declared, giving a firm commitment to - rather than 'ambition to' or 'intention of' - delivering a Carbon Neutral district by 2050.</p>	<p>Comments noted. Supporting text and policy wording amended. Reference to the climate change emergency will be added to the supporting text.</p>
<p>The Climate Change Emergency that has been acknowledged should underpin everything in this local plan. It is imperative that the DDC acts now to address the dual threats of climate change and biodiversity loss with radical action and policies that will mean that in 2040, the District is ahead of the game.</p>	<p>Comments noted. The wording with regard to the climate emergency in this introductory section of the chapter will be strengthened.</p>
<p>Local Plan should consider and take into account possible changes that may arise from the new Agriculture Bill</p>	<p>Comments noted.</p>
<p>The Local Plan should identify the ecosystems most vulnerable to climate change within Dover District and identify potential habitats that require water supply and improved water quality to facilitate climate change</p>	<p>Comments noted and are largely addressed within the Plan and through the policies, where the issues</p>

adaptation. In addition, the Local Plan should seek information to identify habitats that are suitable for climate change adaptation and assess the impacts of the growth on the water quality and supply to these adaptation priority habitats.	are within the scope of the Local Plan.
Plan should include consideration of the impacts of climate change driven sea level rise on the Dover coastline, resulting in coastal squeeze and potential saline inundation. Recommend safeguarding land from development which may be required to address historic and current coastal squeeze and coastal roll back of designated sites. This should be part of identifying a recovery network for coastal habitats. Plan should include considerations of the impacts of climate change on riverine habitats such as increased droughts, increased flooding and saline inundation.	Comments noted. The most vulnerable areas of coastline are addressed by Policy DM8. Coastal Squeeze issues will be addressed and developed during the lifetime of this Plan.
Like to see reference to flood risk in this policy with a commitment to reduce risk by taking a sequential approach to avoid any unnecessary development in flood risk areas.	Policy will be amended to add requirement for sequential approach to avoid development in flood risk areas.
Unable to reconcile how the housing type and distribution in the draft LDP aligns with the LDP's overarching commitments on climate change and carbon neutrality. Need clarification on the methodology used for calculating whole lifecycle carbon footprint for Greenfield sites and brownfield sites.	Comments noted.

Summary of Proposed Changes

- Policy will be amended to add requirement for sequential approach to avoid development in flood risk areas.
- The wording with regard to the climate emergency in this introductory section of the chapter will be strengthened.

DM Policy 1: Reducing Carbon Emissions (Reg 19 Policy CC1)

In total 27 representations were made on this Policy by 24 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2556

Sarah Gleave	Dover and Deal Green Party	DLP2731
Lee Evans Planning	(On behalf of) The Land Trust	DLP1939
Ross Miller	Masterton Robin Designs Ltd	DLP96
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1866, 1916
Bethan Garrity		DLP565
Dr Sharon Danby		DLP638
Mrs Elizabeth Hayes		DLP740
Kelly Lawrence	Deal Town Council	DLP2092
Rosie Rechter		DLP863
Katie Razzell		DLP1928
Zoe Holmes	NHS Kent & Medway Clinical Commissioning Group	DLP956
Mike Eddy	Walmer Parish Council	DLP1973
Mrs Sally Waite		DLP990
Deloitte LLP	(on behalf of) Church Commissioners	DLP1693, 3588
Barbara Cooper	Kent County Council	DLP1708
Nathan Burns	Natural England	DLP1438
Cllr Edward Biggs	DDC Town and Castle Ward	DLP1985
Ms C Smith		DLP970, 1120
Nicky Britton-Williams	Kent Wildlife Trust	DLP1501
Derek Leach	The Dover Society	DLP2989
John Lonsdale		DLP3077
Anne-Marie Martin		DLP3101
Marnie Caton	Sandwich Environmental Conservation Group	DLP3311

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
7 Representations support this policy.	Comments noted and welcomed.
Reducing Carbon Emissions should be stronger than we are awaiting part 2 of the building regulations.	Policy DM1 will be amended to tighten the energy-efficiency

<p>Should include details of how the Council plans to tackle retrofitting houses.</p> <p>This is too unambitious. Other councils already building zero carbon homes.</p>	<p>standards to be required by all new buildings during the lifetime of the Plan. The higher of the two proposed interim reductions in carbon emissions for residential buildings will be required until such time as the Future Homes Standard comes into force, when its emissions reductions (of 75-80%) will apply. This is likely to happen within the early years of the Plan, according to current government advice. In the same way the BREEAM Very Good Standard will be required until such time as the Future Building Standard is introduced, which the government currently indicate will also be within the early years of this Plan. It is considered that this represents the best approach to delivering significant meaningful reductions in emissions, within the context of also needing to demonstrate whole Plan viability.</p>
<p>Wording of this policy should be clear as to whether the requirements relate to new-build development or the change of use/conversion of existing buildings</p>	<p>Comments noted. Policy will be amended to make clear that applies to new residential and non-residential buildings.</p>
<p>Energy Statements must be checked for compliance after construction and enforced rigorously</p>	<p>Reference to implementation of policy with respect to energy statements will be added.</p>

Summary of Proposed Changes

- Future Homes Standard requirements will be added
- Policy will be amended to make clear that applies to new residential and non-residential buildings.

- Reference to implementation of policy with respect to energy statements will be added.

DM Policy 2: Sustainable Design and Construction (Reg 19 Policy CC2)

In total 20 representations were made on this Policy by 19 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2557
Sarah Gleave	Dover and Deal Green Party	DLP2732
Graham Clemas		DLP2393
Iona Dubieniec		DLP2512
Ross Miller	Masterton Robin Designs Ltd	DLP97
Paul Dawkins		DLP211
Jamie Pout		DLP518
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1867, 1917
Dr Sharon Danby		DLP639
Kelly Lawrence	Deal Town Council	DLP2093
Rosie Rechter		DLP864
Mike Eddy	Walmer Parish Council	DLP1974
Barbara Cooper	Kent County Council	DLP1709
Nathan Burns	Natural England	DLP1439
Ms C Smith		DLP1145
Derek Leach	The Dover Society	DLP2990
John Lonsdale		DLP3078
Anne-Marie Martin		DLP3102
Marnie Caton	Sandwich Environmental Conservation Group	DLP3312

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
5 Representations support this policy.	Comments noted and welcomed.

Every new home that is built emits around 80 tonnes of CO2 in its construction. New homes should only be built where there is not the possibility of renovating old.	Comments noted.
To reach the net zero target by 2050 as a nation all new homes should be net zero carbon now.	Please see response to DM1
Policy should include requirement that new builds incorporate modern eco technologies and spend a bigger proportion on local natural planting and landscaping schemes, and local authorities should have a bigger budget for landscaping and tree planting.	Policy requires incorporation of up to date measures for sustainable design and construction.
Do not agree that affordable housing may have to be balanced against building greener homes. As more green homes are built tech like solar panels, grey water recycling systems, ground or air source heating will become cheaper to install. To not install now results in a bigger bill to retrofit homes in the future.	Comments noted.
Paragraph 5.11 should be balanced with the addition of “Sustainable design and construction does, however, result in long term savings to the residents of the homes themselves and benefits the wider community by reducing carbon and other emissions and conserving water resources.”	Reference will be added to the financial benefits to residents and the wider community of sustainable design and construction.
Developers should be encouraged to minimise embodied carbon, assess and mitigate the emissions generated during construction and undertake a full life-cycle assessment of the materials used in construction.	Comments noted.
The refreshed Kent Design Guide, which includes sustainable design, should be referenced in the new sustainable design policy. To ensure homes are warm in winter and cool in summer, homes should be designed to minimise the need for mechanical regulation of internal temperatures, for instance, by increasing natural shading on buildings and at street scene level	The use of natural shading on buildings and at street scene level in order to minimise mechanical regulation of internal temperatures will be added.
The historic environment has a significant role to play in the conservation of resources required for development and in energy efficiency. Historic England has produced guidance that reviews the threats to the historic environment posed by climate change which demonstrates that historic structures, settlements landscapes and old buildings can in fact be more resilient in the face of climate change, and more	Reference to Historic England guidance on energy efficiency measures in listed buildings will be added.

energy efficient than more modern structures and settlements and of course have already been built.	
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Summary of Proposed Changes

- Reference to Historic England guidance on energy efficiency measures in listed buildings will be added.
- The use of natural shading on buildings and at street scene level in order to minimise mechanical regulation of internal temperatures will be added.
- Reference will be added to the financial benefits to residents and the wider community of sustainable design and construction.

DM Policy 3: Renewal and Low Carbon Energy (Reg 19 Policy CC3)

In total 21 representations were made on this Policy by 21 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2558
Sarah Gleave	Dover and Deal Green Party	DLP2733
Duane Poppe	Ringwould with Kingsdown Parish Council	DLP14
Finns Ltd	(on behalf of) Mrs June House	DLP384
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1869
Dr Sharon Danby		DLP640
Mrs Elizabeth Hayes		DLP741
Kelly Lawrence	Deal Town Council	DLP2094
Katie Miller	Kent Downs AONB	DLP1468
Rosie Rechter		DLP862
Jon Bradburn	Montagu Evans LLP	DLP1861
Mike Eddy	Walmer Parish Council	DLP1975
Barbara Cooper	Kent County Council	DLP1710
Nicky Britton-Williams	Kent Wildlife Trust	DLP1514
Ms C Smith		DLP1146
Dover Town Council		DLP1159

Derek Leach	The Dover Society	DLP2991
John Lonsdale		DLP3079
David Spence-Reid		DLP3133
David Reid		DLP3503
Marnie Caton	Sandwich Environmental Conservation Group	DLP3313

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
4 Representations support this policy.	Comments noted and welcomed.
Object to failure to mention retrofitting properties with such as solar panels for heating and electricity production – this technology is becoming cheaper and more accessible to all.	The benefit of retrofitting properties with renewable energy measures will be added to the supporting text.
Change to Developments of renewable and low carbon energy will be supported and encouraged . . . e) impacts on heritage assets and landscape setting have been minimised, f) there is no significant impact on wildlife habitats, biodiversity (particularly protected species).’	Comments noted. Policy wording will be amended.
Remove Criterion j which requires Applicants to show they will source any fuel required in a sustainable manner as planning cannot control where a homeowner chooses to purchase fuel and most development for new dwellings will not remain under the control of the Applicant and will be sold. And Criterion k which requires Applicants to ‘maximise opportunities to address the energy needs of neighbouring uses’. This criterion is unclear in its intentions, especially as a site owner may not own adjoining uses or have any control over them.	Comments noted. Policy wording will be amended.
Is there a consideration for on-shore wind turbines to be built, to make use of our windy weather in this corner of Kent	Comments noted.
Sites should be identified for renewable energy production Recommend that the Plan maps the areas within the Dover District that would be potentially suitable to deliver renewable and low carbon energy schemes.	No sites were proposed for allocation for renewable energy production in Regulation 18 consultation.

<p>Recommend that this policy is amended to take into account the Kent Downs Renewable Energy Position Statement – i.e. that within the AONB only small and medium scale appropriate renewables will be supported where they provide a measurable reduction in greenhouse gases and support landscape character or do not detract from it.</p>	<p>Comments noted and incorporated in amendments to supporting text and Policy wording. Reference to the Kent Downs Renewable Energy Position Statement added.</p>
<p>As presented, Policy presents criteria for assessment that requires all aspects to be met in full before the Council will support the scheme. This presents a high-bar for schemes to pass as, unless all aspects are met positively, the scheme would be refused and there is limited ability to allow for a full assessment of the planning balance where aspects are not fully complied with</p>	<p>Comments noted. The wording of this Policy is considered appropriate given the scale of the climate change emergency and the resultant requirements for change in the planning system.</p>
<p>Concerned that policy states that “The proposals can conserve and enhance the natural environment through measures such as biodiversity off-setting”. This implies that the council is willing to allow loss and deterioration of biodiversity to consent these schemes.</p>	<p>Reference to off-setting removed and improvements to biodiversity will be added</p>
<p>Urge the council to look at local energy schemes and the retrofitting of renewable energies to existing commercial and residential buildings. Such models would benefit both the environment and the local community. Retrofitting of renewable energy has the added benefit of reduced land take for renewables.</p>	<p>Comments noted.</p>
<p>Where large scale renewable energy generation is proposed outside of existing areas, it must be ensured that its delivery does not impact on wildlife designations, or on priority and locally important habitats or species.</p>	<p>Comments noted. Policy wording amended.</p>
<p>Propose the following amendments to DM Policy 3: f) There is no significant impact on the landscape setting, statutory and non-statutory designated wildlife sites, priority and locally important habitats and protected and notable species. g) The proposals must conserve and enhance the natural environment by delivering measurable net gains for biodiversity in line with policy DM Policy 38. m) The retrofitting of renewable energy technologies to existing buildings, in a way that does not increase land take, will be prioritised</p>	<p>Comments noted. Policy wording amended.</p>
<p>Suggest change to ‘Developments of renewable and low carbon energy will be supported and encouraged. .</p>	<p>Comments noted. Policy wording will be amended.</p>

. e) impacts on heritage assets and landscape setting have been minimised, f) there is no significant impact on wildlife habitats, biodiversity (particularly protected species).	
The default preference in the policy needs to be support for developments for renewable and low carbon energy - without so many get out clauses. A climate change emergency suggests drastic action needs to be taken.	Comments noted. Policy wording will be amended.

Summary of Proposed Changes

- Will be updated to reflect the need to prevent a harmful environmental impact on the Kent Downs AONB.
- Policy will be amended to show support for developments for renewable and low carbon energy
- Reference to off-setting removed and improvements to biodiversity will be added
- Criterion relating to sourcing fuel and address maximising energy needs of neighbouring uses will be clarified
- The benefit of retrofitting properties with renewable energy measures will be added to the supporting text.

DM Policy 4: Sustainable Travel (Reg 19 Policy has been moved to Transport and Infrastructure Chapter – TI1 Sustainable Transport and Travel)

In total 32 representations were made on this Policy by 30 consultees. Representations were received from:

Name	Organisation	Comment ID
Carolyn and Trevor Bond		2306
Sonja Watsham	East Kent Climate Action	2559
Sarah Gleave	Dover and Deal Green Party	2734
James Leah	Royal Cinque Ports Golf Club	2070
Ross Miller	Masterton Robin Designs Ltd	98
Stephen Waring		192
Jane Cook	St Margarets-at-Cliffe Parish Council	1871, 1919

Bethan Garrity		566
Dr Sharon Danby		641
Mrs Elizabeth Hayes		742
Mark Burton		777
Kelly Lawrence	Deal Town Council	2095
Duane Poppe	Ringwould with Kingsdown Parish Council	1895
Sarah Slavin		828
Rosie Rechter		865
Mike Eddy	Walmer Parish Council	1977, 1978
Church Commissioners		1694
Barbara Cooper	Kent County Council	1711
Jo Edwards	Sport England	1680
Keith Holness	Nonington Parish Council	2177
Ms C Smith		1147
Mr Francis Maude		1278
Andrew Howard Grigg	Temple Ewell Parish Council	2933
Diane Mouzakis		3256
John Lonsdale		3080
Derek Leach	The Dover Society	2992
David Spence-Reid		3134
Anne-Marie Martin		3103
David Reid		3504
Barton Willmore Planning	Kitewood Estates	3577
Church Commissioners		3589

Summary of Representations – Main Issues	Council's Response – Proposed Changes
4 Representations support this policy.	Comments noted and welcomed.
Bike routes on the quieter roads and along the seafronts need to be promoted and improved including better surfacing.	Support for the enhancement and extension of existing cycle routes will be added to the

	Policy, which also requires the safeguarding of existing walking and cycling routes and the provision of secure cycle parking and storage.
Would welcome more cycle parking and storage facilities in the district and protection of existing routes.	Policy amended to require the safeguarding of existing walking and cycling routes and the provision of secure cycle parking and storage.
Is it the right way to go to invest heavily in battery car charging points? Canterbury City Council are considering a fleet of Hydrogen powered buses due to the opening of a Hydrogen plant in Herne Bay. Perhaps DDC should consider this option.	Comments noted.
(c) could be strengthened to read: "Be readily accessible by sustainable transport modes through the provision of high-quality, engineered, safe and direct walking and cycling routes within the permeable site layout." This would make clear that cycle ways, for example, should be more than a painted line on the road surface.	Requirement for cycle routes to be engineered will be added.
Add: "The Council will safeguard and enhance the rights of way network and other cycle and walking routes from developments that would otherwise compromise their use".	Comments noted and Policy wording amended.
Preference would be for a minimum of 1 charging point in 5 and for every other on-street parking spot to provide an electric charging point by 2040. The Local Plan should be positively seeking to replace diesel and petrol engine buses with electric vehicles within the boundaries of the major towns within 10 years and district wide within 20. Addition to D: For all other types of residential, commercial, industrial and retail developments provide one electric car charging point for every 10 parking spaces provided, with cabling infrastructure capable of at least doubling this to meet future need. Policy should be flexible around the provision of EVCPs in new development. The infrastructure to deliver such a requirement can be costly and, although the use of electric vehicles is growing, the demand may change and switch to other forms of renewable energy such as hydrocarbon.	Comments noted. Provision for charging electric vehicles is included in this Policy as this is the technology in this field that is the most advanced at present. The Council is rolling out a programme of additional charging points in car parks and on streets as part of the Dover Climate Change Strategy and Action Plan.
Is there a way to actively support the installation of more EV charging points in town centres where the	Comments noted.

nature of the streets in the old town and conservation areas precludes the installation at people's houses? This would mean finding ways of funding or encouraging installation in car parks, at on-street parking bays or on lamp posts.	
Increase rural bus service	Comments noted. Bus service provision is outside the scope of the local plan
Commit to a programme to improve and maintain and increase existing cycle routes.	Comments noted and Policy wording will be amended.
Developers should fund/subsidise improvements to sustainable transport e.g. bus in rural/village locations.	Comments noted.
Promote sustainable transport interconnects, bus services that link in with commuter train services. Provide more secure bicycle storage at local railway stations.	Comments noted. Policy will be amended to require enhanced provision of bike storage and parking.
Need for construction of a cycle/foot path between Ringwould and Kingsdown villages	Extension of cycle and footpath routes added to Policy wording.
The PRow network should be considered within this section	Comments noted and Policy wording amended.
Development of high quality 'traffic free' cycle routes should therefore be a priority, to encourage active travel among younger generations and change long term travel patterns. These ambitious proposals could be achieved by upgrading the status of existing PRow or creating new routes, but Local Plan support will be required to deliver these improvements	Comments noted and Policy wording will be amended.
Recommend the following addition: "in areas where there would be significant effect on PRow, the network must also be included in the landscape planning of the infrastructure as a whole"	Safeguarding the existing PRow network will be added to policy wording.
The sustainable transport assessment methodology in the SA to establish transport sustainability isn't robust.	Comments noted.

Summary of Proposed Changes

- References added to PRow networks
- Policy will be amended to require enhanced provision of bike storage and parking.
- Requirement for cycle routes to be engineered will be added.
- Support for the enhancement and extension of existing cycle routes will be added to the Policy, which also requires the safeguarding of existing walking and cycling routes

DM Policy 5: Water Efficiency (Reg 19 Policy CC4)

In total 22 representations were made on this Policy by 20 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2560
Sarah Gleave	Dover and Deal Green Party	DLP2735
Lee Evans Planning	(on behalf of) The Land Trust	DLP1942
James Leah	Royal Cinque Ports Golf Club	DLP2072
Ross Miller	Masterton Robin Designs Ltd	DLP99
Mr Jamie Pout		DLP519
Dr Sharon Danby		DLP642, 3721
Mrs Elizabeth Hayes		DLP743
Kelly Lawrence	Deal Town Council	DLP2096
Rosie Rechter		DLP866
Mike Eddy	Walmer Town Council	DLP1980
Nathan Burns	Natural England	DLP1430, 1440
Lee Evans Planning	(on behalf of) The Land Trust	DLP1942
Sara Gomes	Environment Agency	DLP1535
Ms C Smith		DLP968
Derek Leach	The Dover Society	DLP2993
John Lonsdale		DLP3081
Anne-Marie Martin		DLP3104
David Reid		DLP3505
Marnie Caton	Sandwich Environmental Conservation Group	DLP3314
Peter Ashford		DLP3520

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
7 Representations support this policy.	Comments noted and welcomed.

DDC is in a severely water stressed area, and not a high water stress area. This needs correcting.	The classification of Dover district as severely water stressed will be corrected
DDC should ensure non-residential buildings meet BREEAM excellent standard.	See response to Policy DM1.
Stronger policies needed to protect water supplies and provide for more above ground storage.	Comments noted.
Greater protection of chalk aquifers from over abstraction of water. Water scarcity in Dover district and chalk streams are being over abstracted. Building houses at a rate of 11920 in the next 20 years will only exacerbate this problem and should be reviewed immediately with central government. A water crisis will be far more damaging than a housing crisis. Settlement should be avoided in areas that do not have enough water.	Comments noted. The higher water efficiency measures required by this policy, alongside requirements for sustainable design and construction methods in Policy DM2 will result in significant reductions in demand for water over the plan period.
Grey/rainwater harvesting should be an integral part of new house design and retrofitting existing housing stock supported.	Comments noted. Reference made to the importance of measures such as grey water harvesting acknowledged in the supporting text.
Achieving a maximum use of 110 litres per person per day is unachievable across the district given the quality of existing building stock and the lack of incentives to improve properties.	Comments noted. As the supporting text to this policy makes clear Dover District is an area of severe water stress. Such measures are required in order to protect scarce water resources.
Support requirements for developments to achieve tighter water efficiency standards. Because Dover District contains areas of Serious Water Stress, encourage setting a requirement tighter than 110 litres such as Southern Water's Target 100 litres per person per day.	A target of 110l per person per day is appropriate for severely water stressed area. Government policy does not allow local authorities to require further reduction in daily water usage through planning policies. The policy is supportive of such proposals if they are proposed. No request was received from Southern Water for a reduction to 100l pppd.
Require reduction in water consumption by fitting water efficient taps in new builds, grey water systems in new	Comments noted. Sustainable design and

build should be compulsory, and include water storage in developments with gardens as a must.	construction methods required by Policy DM2 and will result from imminent uplift in Building Regulations through Future Homes and Future Buildings Standards.
Clarification should be provided as to whether BREEAM 'Very Good' standard requirement relates to existing buildings and the regeneration of heritage sites.	Policy DM1 will be amended to make clear that BREEAM applies to new buildings.

Summary of Proposed Changes

- The classification of Dover district as 'severely water stressed' will be made

DM Policy 6: Flood Risk (Reg 19 Policy CC5)

In total 19 representations were made on this Policy by 19 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2561
Sarah Gleave	Dover and Deal Green Party	DLP2736
Caroline Austin		DLP2247
Richard Barry		DLP63
Ross Miller	Masterton Robin Designs Ltd	DLP100
Jamie Pout		DLP520
Dr Sharon Danby		DLP643
Kelly Lawrence	Deal Town Council	DLP2097
Rosie Rechter		DLP867
Mike Eddy	Walmer Parish Council	DLP1984
Barbara Cooper	Kent County Council	DLP1712
Sara Gomes	Environment Agency	DLP1551
Ms C Smith		DLP971
Shelley Morris		DLP3245

John Lonsdale		DLP3082
David Spence-Reid		DLP3135
David Reid		DLP3506
Marnie Caton	Sandwich Environmental Conservation Group	DLP3316
Chris Pagnall	Quinn Estates	DLP3621

Summary of Representations – Main Issues	Council's Response – Proposed Changes
4 Representations support this policy.	Comments noted and welcomed
Wetter winters are a feature of climate change, as are rising sea levels so more of the district (inland and on the coast) is likely to be at risk of flooding. Undeveloped valley bottoms within 3 miles of urban settlements should be left undeveloped both as a means of allowing natural means of flood prevention, and to prevent new homes from being flooded.	Comments noted.
Policy must be made much stronger. Consideration ought to be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration. The Authority needs to positively discourage further development on flood plains (the only exception should be infill/brownfield development in existing conurbations) and positively encourage the development of more marginal sites and those that are in the lowest flood risk areas	The supporting text and Policy wording will be strengthened to provide further emphasis on the need to avoid inappropriate development in areas at risk of flooding.
Kent County Council formally adopted a revised Drainage and Planning Policy Statement in November 2019 – it is recommended that this is referenced within the Local Plan.	Supporting text will be amended to make reference to this revised Statement.
Where development does, exceptionally, go ahead, all floor levels for living and sleeping accommodation should be set a minimum of 300mm and 600mm above the design flood level respectively (including an allowance for climate change).	Policy wording will be amended.
FRAs should use the best and latest modelling information available.	Comments noted. Supporting text will be added to direct applicants

	to the Council's site specific guidance for managing flood risk and the information required for FRAs.
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Summary of Proposed Changes

- Supporting text will be added to direct applicants to the Council's site specific guidance for managing flood risk and the information required for FRAs.
- The supporting text and Policy wording will be strengthened to provide further emphasis on the need to avoid inappropriate development in areas at risk of flooding.
- Reference will be added to Kent County Council formally Drainage and Planning Policy Statement in November 2019

DM Policy 7: Surface Water Management (Reg 19 Policy CC6)

In total 21 representations were made on this Policy by 20 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2562
Sarah Gleave	Dover and Deal Green Party	DLP2737
Iona Dubieniec		DLP2513
Peter Jull		DLP15
Ross Miller	Masterton Robin Designs Ltd	DLP101
Dr Sharon Danby		DLP644
Mrs Elizabeth Hayes		DLP744
Kelly Lawrence	Deal Town Council	DLP2098
Tamzyn James	Southern Water	DLP1556
Rosie Rechter		DLP868
Katie Razzell	Aylesham Parish Council	DLP1930
Mike Eddy	Walmer Parish Council	DLP1986
Barbara Cooper	Kent County Council	DLP1713
Nathan Burns	Natural England	DLP1441

Sara Gomes	Environment Agency	DLP1523, 1542
Ms C Smith		DLP972
Derek Leach	The Dover Society	DLP2995
John Lonsdale		DLP3083
Marnie Caton	Sandwich Environmental Conservation Group	DLP3315
Kitewood Estates	Barton Willmore Planning Partnership	DLP3578

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
6 representations supported this policy	Comments noted and welcomed
Sustainable drainage solutions for new housing. run off not impermeable driveways mandate the use of grasscrete.	Comments noted. The use of plastic grass is outside the control of the planning system.
Policy should encourage designs that do comply to avoid the heavy burden of future maintenance falling on the occupiers of affordable housing on new developments, thus making them less affordable.	Comments noted.
Policy should be made much stronger. Consideration ought to be given to the area-wide cumulative impact of existing and planned developments, in addition to the application under consideration.	Policy wording will be amended and strengthened.
No surface water connection should be made to a foul only sewer as per Building Regulations 2010 Drainage and waste disposal H3 Rainwater Drainage. Page 39 states that “b. a rainwater drainage i. carries the flow of rainwater from the roof to an outfall (a soakaway, a watercourse, a surface water or a combined sewer.”	Policy text will be amended to bring it into line with building regulations with regard to connections to public, foul only and combined sewers.
Advise criterion change for DM Policy 7 Surface Water Management needed; The discharge of surface water runoff into a public surface or combined sewer will only be acceptable, if an assessment of the capacity of the sewer has been undertaken, and the evidence demonstrates that there is no increased flood risk. Connection of surface water to a foul only sewer will not be acceptable.	Policy wording will be amended.
When SuDS are planned, it is important that the potential impact on the historic environment is fully considered and any unavoidable damage is mitigated.	The need to consider any potential impact on, and to mitigate against any unavoidable damage to,

	the historic environment in the planning of SuDS, will be added to supporting text.
Suggest adding some more information regarding the benefits of using sustainable drainage systems.	The benefits of using sustainable drainage systems will be added to supporting text.
Recommend add to the end of the paragraph: “Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer.”	Protection of Groundwater Source Protection Zones will be added to the Policy.

Summary of Proposed Changes

- Protection of Groundwater Source Protection Zones will be added to the Policy.
- The benefits of using sustainable drainage systems will be added to supporting text.
- The need to consider any potential impact on, and to mitigate against any unavoidable damage to, the historic environment in the planning of SuDS, will be added to supporting text.
- Changes to policy wording relating to surface water runoff will be made

DM Policy 8: Coastal Change Management Areas (Reg 19 Policy CC7)

In total 12 representations were made on this Policy by 12 consultees. Representations were received from:

Name	Organisation	Comment ID
Sonja Watsham	East Kent Climate Action	DLP2563
Sarah Gleave	Dover and Deal Green Party	DLP2738
Ross Miller	Masterton Robin Designs Ltd	DLP102
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1872
Kelly Lawrence	Deal Town Council	DLP2099
Rosie Rechter		DLP869

Mike Eddy	Walmer Parish Council	DLP1987
Sara Gomes	Environment Agency	DLP1524
Derek Leach	The Dover Society	DLP2996
John Lonsdale		DLP3084
David Spence-Reid		DLP3136
Anne-Marie Martin		DLP3105
Ken Chapman	Sandwich Bay Bird Observatory Trust	DLP294

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
6 representations support this policy	Comments noted and welcomed.
Any opportunities to increase areas of saltmarsh and inter-tidal areas, e.g. by managed retreat as a flood protection measure, as a response to sea level rise and increased risk of storm surges, should be allowed and encouraged. Not only are these areas important habitats in their own right, they also, along with freshwater wetlands, act as carbon sinks, sequestering atmospheric carbon dioxide.	The need to plan for sea level rises is acknowledged and will be progressed alongside this Local Plan. However, saltmarshes and inter tidal areas does not apply to the CCMA’s in this district which cover stretches of coastal cliffs, and the issue is instead addressed by the natural environment chapter.
<p>Development in these areas should be avoided as far as is possible and only allowed in very exceptional circumstances if at all.</p> <p>The policy recommendations in the Review of CCMA’s June 2018 is that “Permanent new development will not be permitted” This recommendation should be taken forward in this policy. Therefore, would not wish to see new ‘more vulnerable’ development permitted in these areas and would support the Review’s recommendation that any permissions should be time-limited only. Certainly, no new residential development should be permitted in CCMA’s.</p> <p>Policy DM 8 could be improved by adding the following: “Only essential business proposals will be allowed in vulnerable areas and they must show that</p>	Policy will be strengthened to clearly reflect the recommendations of the most recent Coastal Change Management Areas Review and the NPPF (2021), including to make clear what development will be allowed in CCMA’s and that permanent new development will not be permitted.

their processes are not likely to create to pollution risks in the event of coastal or other flooding.”	
Building on flood plains around Deal and on the beach at Kingsdown should not be permitted as loss of life could result if the sea defences in Deal were over topped or a tidal surge occurred.	Comments noted. Managing flood risk is addressed through Policy DM6.
For any development within a CCMA, the management of surface water using infiltration/soakaways should not be permitted along with ponds, swimming pools and septic tanks.	Policy wording will be amended to make this clear.
Suggest adding more information, including more details regarding legislation: Coastal water should be restored and enhanced to a more natural state when possible and maintained as such thereafter. This could be minor works right up to managed realignment. Water Framework Directive includes environmental requirements including: no deterioration of watercourses and the achievement of good ecological status or good ecological potential.	Policy wording will be amended to provide further information.

Summary of Proposed Changes

- Policy will be strengthened to reflect the recommendations of the most recent Coastal Change Management Areas Review and the NPPF (2021)
- Amendments will be made regarding legislation around coastal water and WFD
- Amendment will be made to cover any development within a CCMA, the management of surface water using infiltration/soakaways should not be permitted along with ponds, swimming pools and septic tanks.

DM Policy 9: Tree Planting and Protection (Reg 19 Policy CC8)

In total 43 representations were made on this Policy by 40 consultees. Representations were received from:

Name	Organisation	Comment ID
Carolyn and Trevor Bond		DLP2307
Russell Thompson		DLP2604
Sonja Watsham	East Kent Climate Action	DLP2564
Sarah Gleave	Dover and Deal Green Party	DLP2739
Graham Clemas		DLP2394

Lee Evans Planning	(on behalf of) The Land Trust	DLP1943
Brenda Gray		DLP2872
Ross Miller	Masterton Robin Designs Ltd	DLP103
Nick Eede		DLP216
Martin Brandon		DLP360
Mr Jamie Pout		DLP521
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1873
Mike Eddy	Walmer Parish Council	DLP1979
Bethan Garrity		DLP567
Dr Sharon Danby		DLP645
Thomas Patrick Johnstone		DLP704
Mrs Elizabeth Hayes		DLP745
Kelly Lawrence	Deal Town Council	DLP2100
Katie Miller	Kent Downs AONB	DLP1469
Rosie Rechter		DLP870
Katie Razzell	Aylesham Parish Council	DLP1926
	Church Commissioners	DLP1695
Barbara Cooper	Kent County Council	DLP1714
Nicky Britton-Williams	Kent Wildlife Trust	DLP1516
Nathan Burns	Natural England	DLP1442
Lee Evans Planning	(on behalf of) the Land Trust	DLP1943
Sara Gomes	Environment Agency	DLP1525
Dover Town Council	Dover Town Council	DLP1165
Ms Christine Haggart	Ash Parish Council	DLP1166
Ms C Smith		DLP1176
Seb Willett	Langdon Parish Council	DLP1230
Jason Ransley	Dover Harbour Board	DLP836
Shelley Morris		DLP3246
John Lonsdale		DLP3085
Anne-Marie Martin		DLP3106
Sarah Gleave	Kent Pond and Tree Partnership	DLP2195,6,7,8

Marnie Caton	Sandwich Environmental Conservation Group	DLP3317
Kitewood Estates	Barton Willmore Planning Partnership	DLP3579
Joanne McKeown		DLP3129
Derek Leach	The Dover Society	DLP2997
Church Commissioners		DLP3590

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
10 representations supported this policy	Comments noted and welcomed.
Why is there no set aside deal for the creation of woodland and trees.	Comments noted. The Green Infrastructure Strategy and the Local Nature Recovery Strategy will address the enhancement and expansion of biodiversity habitats in the district.
There must be much more onerous requirements for trees removed by developers to be replaced and a presumption against all development that removes trees unless the development benefit substantially outweighs the loss of trees.	Comments noted. Policy wording will be amended.
State clearly in the plan that there is a presumption against all development that requires removal of trees and development will only be allowed if the benefit substantially outweighs the loss of the trees.	The policy makes clear that the loss of or damage to trees of significant amenity, biodiversity or historic value will not be permitted. The removal of non-TPO-d trees largely falls outside the planning system.
Where felling is deemed acceptable then the requirement to plant 2 trees for each lost is not enough - suggest 10 trees for each lost. Likewise suggest a similar number where trees are lost for new dwellings in order to address climate emergency.	Comments noted.
There is no sign of council’s Tree Planting Strategy online or in the draft Local Plan	A Tree Strategy is planned as part of the Green Infrastructure Strategy and Action Plan that will be produced as part of the delivery of this Plan.

<p>According to the latest national Woodland Trust survey Dover has only 4.8% of woodland cover in the district - against a UK average of 13% (the EU average is 37%) and a national target of 17%.</p>	<p>Comments noted.</p>
<p>The government has committed to planting 30,000 hectares per year across the UK by 2025. What is the council doing to support this commitment to tree planting?</p>	<p>This policy will result in a significant expansion in the tree cover in the district.</p>
<p>Young saplings do not fare well if not cared for properly and can provide only limited carbon sequestration at the beginning of their lives. Older trees fix vastly more carbon than young ones, the luxury of time to allow these young trees to mature and start fixing significant amounts of carbon is something we do not have. Younger trees are going to suffer trying to get established with climate change and more drought.</p> <p>New planting should not be considered as an acceptable means by which to mitigate the felling of healthy mature trees. The carbon sequestration benefits and other amenity value of mature trees must be protected, whether under a formal Tree Preservation Order or not. Where it is absolutely unavoidable to remove a mature tree, 10 new trees should be planted with provision made for their ongoing care and protection.</p>	<p>Comments noted. Policy acknowledges the importance of existing trees and provides protection where possible within the scope of the planning system.</p> <p>Government Guidance does not currently allow the making of TPOs for the sole reason of climate change mitigation. PPG states 'Where relevant to an assessment of the amenity value of trees or woodlands, authorities may consider taking into account other factors, such as importance to nature conservation or response to climate change. These factors alone would not warrant making an Order'.</p>
<p>Council policy should be focused on public trees as community assets rather than those in private ownership. However, where retaining mature trees on-site requires this to be within a garden of a new development, such trees should then be protected by the making of Tree Preservation Orders.</p>	<p>Comments noted.</p>
<p>A requirement for one new tree to be planted per new job created could be unsuitable in the context of some sites, particularly where the historic environment is involved. Applications should be able to provide a landscaping scheme based on what is most appropriate for that particular site.</p> <p>Requirement is too prescriptive. To deliver sustainable development, it may not be possible for a scheme to</p>	<p>Policy wording provides for sites where it is demonstrated that on-site provision is not feasible.</p>

provide two trees on site per new dwelling, particularly if the site is constrained. Alternative offsetting measures such as green roofs etc, should be allowed through the policy where the provision of new trees is not considered feasible or appropriate.	
Insert the word “standard” before each reference to replacement tree(s). Whips will not be acceptable.	Policy wording will be amended.
The section on Tree Protection and Replacement requires strengthening at paragraph (g) by the following amendments: “Trees protected by Tree Preservation Orders will be retained wherever possible unless: A. It can be demonstrated by a qualified arboriculturist approved by the council and at the developer’s cost that they are dead, dying, diseased or represent a hazard to public safety; or B. The Council deems the felling to be acceptable under the terms of the Council’s published policy on tree management; or C. The benefit of the proposed development demonstrably outweighs the benefits of their retention.”	Policy wording will be amended.
The protection of existing mature trees needs to be given much higher priority than planting new saplings.	Policy text has been tightened to require trees to be provided to be of at least standard size (girth greater than 6cm) and from bio-secure stock.
Developments where tree planting cannot be provided on-site should not normally be considered. The provision that where trees cannot be provided on-site ‘a contribution can be made towards the Council’s Tree Planting Strategy’ should be removed. This is unacceptably vague and there is no published DDC Tree Planting Strategy.	A Tree Strategy is planned as part of the Green Infrastructure Strategy and Action Plan that will be produced as part of the delivery of this Plan.
Trees should be native species, broadleaf trees sourced from, and grown in, the UK to reduce the risk of tree disease and pests – ideally they should have the Plant Healthy standard.	Policy text will be tightened to require trees to be provided to be of at least standard size (girth greater than 6cm) and from bio-secure stock.
Where tree planting is being considered as a method of carbon sequestration, it may be appropriate to consider hedgerow instead and other habitats that offer similar natural solutions to climate change.	Acknowledgement of role of other natural habitats in providing carbon sequestration added to supporting text.
There is a risk that the council’s policy which solely relates to tree planting will be detrimental to nature’s recovery in Dover. Whilst there are a multitude of	Acknowledgement of role of other natural habitats in providing carbon

<p>benefits that trees provide to wildlife and people, it must be ensured that the right trees are planted in the right place. Tree planting must not result in the loss of priority or locally important habitats, and opportunities to enhance other habitats should be identified to support a greater diversity of species. For example, birds such as the Chough, which is set to be reintroduced to Dover, relies of grassland habitat for foraging.</p>	<p>sequestration added to supporting text.</p>
<p>The Council should think beyond tree planting and to look at the creation and enhancement of other habitats which sequester carbon. These include saltmarsh, grazing marsh and grassland which store carbon in soils. Wherever possible habitat creation should be via a process of natural regeneration, which is a less resource intensive than traditional methods (i.e. regimented tree planting) and creates more biodiverse habitats. The delivery of such habitats should be informed by a Local Nature Recovery Strategy.</p>	<p>Acknowledgement of role of other natural habitats in providing carbon sequestration added to supporting text.</p>
<p>Update DM Policy 9 to account for carbon sequestration as a whole to ensure that the Plan tackles both the climate and nature crisis.</p>	<p>Acknowledgement of role of other natural habitats in providing carbon sequestration added to supporting text.</p>
<p>Tree Planting Strategy should be linked to a Green Infrastructure Strategy as there are clear benefits to planning for these at a strategic scale. Multiple benefits include planning for climate change and resilience via providing wildlife corridors through the landscape.</p>	<p>A Tree Strategy is planned as part of the Green Infrastructure Strategy and Action Plan that will be produced as part of the delivery of this Plan.</p>
<p>Though tree planting and protection is essential to achieve a carbon neutral status by 2050, carbon sequestration can be better achieved with the creation and appropriate management of habitats such as grasslands and wetlands. The creation and restoration of wetland habitats can also assist with water quality, increased biodiversity and flood alleviation through natural flood management.</p>	<p>Acknowledgement of role of other natural habitats in providing carbon sequestration added to supporting text.</p>
<p>Given that gardens in new developments are increasingly small, the two trees required for each dwelling are likely to be in public /communal areas. Set alongside the stated position that on-site planting is preferable, the policy needs to make it clear that new developments have to provide acreage for the planting of trees - this will ensure that there are open and green spaces for new build residents near to their homes.</p>	<p>Comments noted.</p>
<p>Condition to planning guidelines requiring the inclusion of hedgehog highways to be included in new</p>	<p>Hedgehog highways will be included in Policy DM36.</p>

developments must be enforced. 13cm sq hole to be included in the base of all fences of new builds.	
More tree officers needed, increase in resources.	Comments noted.

Summary of Proposed Changes

- Acknowledgement of role of other natural habitats in providing carbon sequestration added to supporting text.
- Policy text will be tightened to require trees to be provided to be of at least standard size (girth greater than 6cm) and from bio-secure stock.

Climate Change Chapter - Regulation 19 Policy Name and Reference Changes

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 1 – Planning for Climate Change</i>	<i>SP1 – Planning for Climate Change</i>
<i>DM Policy 1 – Reducing Carbon Emissions</i>	<i>CC1 – Reducing Carbon Emissions</i>
<i>DM Policy 2 – Sustainable design and construction</i>	<i>CC2 – Sustainable design and construction</i>
<i>DM Policy 3 – Renewable and low carbon energy</i>	<i>CC3 – Renewable and low carbon energy development</i>
<i>DM Policy 4 - Sustainable travel</i>	<i>Moved to Transport and Infrastructure chapter</i>
<i>DM Policy 5 – Water efficiency</i>	<i>CC4 – Water efficiency</i>
<i>DM Policy 6 – Flood risk</i>	<i>CC5 – Flood risk</i>
<i>DM Policy 7 – Surface Water Management</i>	<i>CC6 – Surface Water Management</i>
<i>DM Policy 8 – Coastal Change Management Areas</i>	<i>CC7 – Coastal Change Management Areas</i>
<i>DM Policy 9 – Tree planting and protection</i>	<i>CC8 – Tree planting and protection</i>

Chapter 6 – New Homes

Strategic Policy 2: Housing Growth (Reg 19 Policy SP3 -Planning for Housing Growth)

In total 197 representations were made on this policy by 168 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mrs Jennifer Crascall		DLP271
Mr Peter Wynn	Homes England	DLP283
Robert Marshall		DLP337
Miss Julie-Anne Mackett		DLP343
Mr Andy Hage		DLP362
Mr Patrick Grinter		DLP365
Mrs Burnett A Burnett		DLP376
Mr Martin Brandon		DLP380
Mrs June House	Finn's Ltd	DLP396
Mr Kevin Scrase		DLP422
Mrs Rosemary Clarkson		DLP432
Mr Ian Clarkson		DLP435
Kunal Patel		DLP452
Mrs Jean Ross		DLP476, DLP612, DLP1401
Mr Owen Wilson		DLP496
Mr Jamie Pout		DLP526
Mrs Susan Taber		DLP543
Mrs Gokhan Egin		DLP556
Dr Sharon Danby		DLP569, DLP3653, DLP3722
Mrs Gillian Clipstone		DLP607
Mrs Emma Collins		DLP646
Miss Frankie Childs		DLP653
Mr Liam Clifton		DLP655
Mr George Addis		DLP683
Alexander Blanshard		DLP732
Mr Geoffrey Stradling		DLP734
Mrs Helen Boughtwood		DLP735
Mr Michael Parker		DLP823
Sarah Slavin		DLP844
Mrs Sacha Davies		DLP880
Seb Willett	Langdon Parish Council	DLP907
Mrs Karen Shubert		DLP915
Mrs Caroline Loder Symonds		DLP978
Tim Spicer	DHA Planning Ltd	DLP1028
Mrs Lindsey Webb		DLP1033
Mr Kevin Woolmer		DLP1042
Dr Sonia Frost		DLP1046

Mrs Katie Gibbs		DLP1049
Nick Austin		DLP1075
Anna Thomlinson		DLP1081
Mrs Christine Oliver		DLP1084
Mr Darren Butland		DLP1112
Mr Eric Martinand		DLP1119
Miss Clair Harrison		DLP1135
Nick Banks	Richborough Estates Limited	DLP1198
Dr Martin Ferber		DLP1217
Mr Mark Presland		DLP1282
Andy Tee		DLP1283, DLP1284
Mr Adam Wadey		DLP1288, DLP1290
Charles Pottle		DLP1300
M L Page		DLP1345
Keith Heaven		DLP1372
Nathan Burns	Natural England	DLP1426
Toby Snape	Quinn Estates	DLP1502
	Canterbury City Council Planning Department	DLP1505
David Whittington	Folkestone & Hythe District Council	DLP1545
Sara Gomes	Environment Agency	DLP1553
Mr Jon Flaig	Aylesham Hub Ltd	DLP1610
	Energy Ark Developments	DLP1616
Mr Alan Byrne	Historic England	DLP1645
	Church Commissioners	DLP1696
Barbara Cooper	Kent County Council	DLP1720, DLP1722
Kevin Bown	Highways England	DLP1786
Cllr Pamela Brivio	DDC Ward – Tower Hamlets	DLP1801
Susan Smith	Sutton by Dover Parish Council	DLP1810
Valerie McWilliams	Womenswold Parish Council	DLP1828
Kerry Coltham	Wingham Parish Council	DLP1829
Cllr Charles Woodgate	DDC Ward – Aylesham, Eythorne and Shepherdsweil	DLP1833
Caroline Vincent	Eythorne Parish Council	DLP1836
Jean Swan	Preston Parish Council	DLP1846
Mr Kevin Lynch	Worth Parish Council	DLP1857
Mr Kevin Lynch	Sholden Parish Council	DLP1877
	Archers Court Road	DLP1911
Katie Razzell	Aylesham Parish Council	DLP1924, DLP1931, DLP1935, DLP1941
	East Marlborough Road	DLP1954
Cllr Edward Biggs	DDC Ward – Town and Castle	DLP1976, DLP1993

Mike Eddy	Walmer Parish Council	DLP1989
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2010 and DLP2012
Cllr Peter Walker	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2026
Bob Sleith	Aylesham4Aylesham	DLP2087
Kelly Lawrence	Deal Town Council	DLP2101
Keith Holness	Nonington Parish Council	DLP2158, DLP2164, DLP2172, DLP2181
Jim Wooldridge		DLP2215
Kerry Keating		DLP2218
Scott Robert Keating		DLP2228
Mr Keith Cox		DLP2446
Rosalind Cox	Womenswold Residents	DLP2449
Rachel Ely		DLP2525
Anna Evans		DLP2527
Stephen Farley		DLP2532
Susan Farley		DLP2533
David Fleck		DLP2688
David Freud		DLP2695
Chris Gabriel		DLP2696
Adair Giuliano		DLP2725
Ms Sarah Gleave	Dover and Deal Green Party	DLP2741
Mrs Jan Griffin		DLP2878
Carlie Wilcock		DLP2885
Mr and Mrs Hayes		DLP2904
Robert Hogben		DLP2913
Keith Holness		DLP2914
Mr Terence Hopper		DLP2915
Gerald Irvine		DLP2946
Therese Jimenez-Agarwal		DLP2959
Michael & Elizabeth Kinns		DLP2963
Derek Leach	The Dover Society	DLP2999
Patricia Macfarlane		DLP3089
Kim Mardle		DLP3094
Alison Marshall		DLP3097
Roy Marshall		DLP3098
Gary Maynard		DLP3119
Mr Kevin Raine		DLP3158
Sandra & Andrew Miller		DLP3233
Lynn Moorlen		DLP3241
Shelley Morris		DLP3248
Diana Mouzakis		DLP3255
Alison Heine	Heine Planning Consultancy	DLP3264
Kia Scott		DLP3290

Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3326
Mr P Bailey		DLP3348
D Belsey		DLP3366
Fernanda Clarke		DLP3379
Mr D C Dixon		DLP3389
Mrs Flynn		DLP3400
Brian & Pam Hancock		DLP3418
Rev'd & Miss Mower		DLP3442
Mrs M D Plant		DLP3452
Mr J Powell		DLP3456
Michael Profitt		DLP3460
Bruce Laird		DLP3465
Angela Simmons		DLP3468
Briony Sutcliffe		DLP3469
Mr Winter		DLP3484
Mrs Tallulah Murphy		DLP3488
Kieren Elkins		DLP3512
Peter Ashford		DLP3521
Richard Parkes		DLP3522
Catherine Elizabeth Marshall		DLP3523
Joy Harrison		DLP3527
Stephen Easton		DLP3528
Fiona James		DLP3529
Patricia Swinbourne		DLP3532
Hilary Brown		DLP3536
Natalie Musgrove		DLP3547
Clare Marsh		DLP3549
Shannon Garland		DLP3560
Dorthe Bucknell		DLP3564
Barbara Morgan		DLP3567
Hannah Haddad	Savills	DLP3572
Grace Martin	Hume Planning Consultancy Ltd	DLP3575, DLP3587, DLP3638
Lucy Wilford	Barton Willmore	DLP3576
Esme Sparrow	Iceni Projects	DLP3583, DLP3586, DLP3603, DLP3609
Karl Elliott	Clague Architects	DLP3584
Henry Wagstaff	Strutt & Parker	DLP3585, DLP3635
Alice Young-Lee	Deloitte LLP	DLP3591
Mrs Klaire Lander	Lander Planning	DLP3601
Reece Lemon	Hume Planning Consultancy Ltd	DLP3605, DLP3606, DLP3611, DLP3615, DLP3643
Rebecca Foad	DHA Planning	DLP3616, DLP3626, DLP3627
Chris Pragnall	Quinn Estates	DLP3620
Philippa Robinson	Savills	DLP3629

Rachel Allwood	Dandara Ltd	DLP3633
Sophie Innes	Iceni Projects	DLP3636, DLP3639
Susan Gall		DLP3641
Mrs Sue Ward		DLP3647
Dr Raju Sakaria		DLP3659
Mr Mark Norcliffe		DLP3694
Julie Davies	CPRE	DLP816, DLP3702
Stephen Mason		DLP3720

Summary of Representations - Specific Issues Raised on SP2 Housing Needs

Summary of Comment	Council's Response
The council should apply a buffer of 20% to its five year housing land supply given the results of the Housing Delivery Test for this year.	The Councils Housing Supply Technical Paper has been updated recently (2022) and applies a 5% buffer to the five year housing land supply calculation as per the HDT requirement.
Support from the development industry for the Council to deliver homes in excess of the housing target to ensure choice and flexibility in supply.	Comments noted. The local plan notes that the housing target is a minimum rather than a ceiling allowing further development to come forward provided it is in accordance with the Plan. The housing supply position in the plan also includes a supply resilience buffer on the local housing need figure and a 5% non implementation discount on the extant supply.
The Local Plan housing target should be the minimum OAN plus a 20% resilience buffer with any new allocations being for small to medium sized sites on the immediate edge of the settlements identified by DDC.	The housing supply position set out at table 6.1 in the plan already includes a 10 % supply resilience buffer on the local housing need figure and a 10% non implementation discount on the extant supply to provide resilience in supply, which we consider to be adequate and justified. A targeted call for sites was undertaken as part of the Reg 18 consultation to identify small sites with potential for allocation in the Plan to bolster our small sites supply in accordance with the NPPF.
An error has been identified in Table 6.1. Balance from HELAA sites should be 5,314 (13,112 - 7,798).	Table 6.1 will be updated in the Reg 19 Local Plan.
Questioned how vacant properties in district can contribute to meeting housing need.	For vacant homes to count towards meeting housing need the LPA would need robust evidence to ensure that empty homes had not already been counted as part of the existing stock of dwellings to avoid double counting.
Objection to the imposition of a housing target from central government.	Comment noted
Concern that the housing target is too high.	Comment noted. The housing target is based on the standard method calculation set out in national planning guidance.
Support and recognition for the role that windfall development plays in meeting housing need.	Comment noted

Support from neighbouring authorities (Folkestone and Hythe and Canterbury) that the Council is planning to meet its housing need in full.	Comments noted
Recognition and support of the role that small sites play in meeting housing need.	Comment noted. The strategy is in conformity with the NPPF which requires LPAs to accommodate at least 10% of their housing requirement on sites no larger than one hectare.

Housing Growth

Summary of Comment	Council's Response
Strategic site allocation policies need to include reference to adhering to Garden Village Principles.	Strategic sites policies will be updated accordingly.
Paragraph 6.97 – It is essential that new development works with the grain of the existing landscape and settlements so that they appear to be a natural expansion rather than an entirely new construct. It is important that any heritage assets, in the form of historic buildings or archaeological monuments, and the historic landscape, in the form of the pattern of tracks, lanes and field boundaries, are integrated into the masterplans for the new villages. At present, only the fifth bullet refers to the need to respond to local character; KCC would recommend that the text is strengthened to ensure that the heritage of a new settlement is fully integrated into the new design.	Comments noted. The garden village principles will be updated accordingly.
Support growth in rural settlements to grow and reinforce their role. This would help to support the viability of those local centres and villages.	Comment noted. This approach is reflected in SP2.
The viability of sites and their ability to contribute affordable housing is crucial to the selection of growth options and specific sites in DDC. The SA is incorrect to assume that larger sites will deliver higher numbers of affordable dwellings.	A whole Plan viability assessment has been undertaken of the Reg 18 Plan. This has informed our approach to affordable housing delivery in the Plan. Sites will be expected to deliver affordable housing in accordance with this. A viability assessment of the strategic sites will be undertaken prior to Reg 19.
Natural England are concerned about the number of strategic development sites that are within close proximity to	Sites considered as part of the HELAA have been subject to landscape assessment and the AONB unit have

Summary of Comment	Council's Response
the Kent Downs AONB. The Dover Local Plan should fully explore the impacts of proposals affecting the AONB via a LVIA which clearly appraises the special qualities of the AONB.	also been consulted in relation to sites in and adjacent to the AONB.
Folkestone and Hythe District Council have stated that development at Capel and the cross-boundary infrastructure issues resulting from this will need to be addressed in an updated Statement of Common Ground between the two councils.	Officers will be in contact with Folkestone and Hythe LPA to update the Statement of Ground.
Sites that fall within FZ3 should be subject to the normal requirements for Flood Risk Assessments and The Exception Test. The EA have also recommended that floor levels are raised in these areas.	Site allocations in Flood Zone 3 will be subject to the Sequential Test and Exceptions Test. DM Policy 6 will be updated to reflect these comments.
Concern that existing infrastructure and road network is inadequate and wont be able to support the housing growth identified. Housing growth needs to be sustainable and supported by infrastructure.	Comments noted. This will be addressed in the Transport and Infrastructure Chapter and Infrastructure Delivery Plan.
Historic England is keen to work with the Council to mitigate the impact of the housing growth strategy on the historic environment.	Comments noted. A heritage assessment has been undertaken of all the proposed site allocations. Historic England will be consulted on relevant sites moving forwards.
Consensus that more evidence needs to be provided to demonstrate that the Whitfield Urban Extension is deliverable and the issues identified on this site have been resolved.	The Whitfield SPD is being updated prior to Reg 19. Strategic Policy 4 will also be updated prior to Reg 19. The Council is committed to working with the developers of this site to take it forward.
Support the aim of the growth strategy to ensure the majority of growth is focused within urban locations at Dover Urban Area and Whitfield – this focused development in more urban locations allows for greater opportunities for the delivery of sustainable infrastructure. Support the aim of the growth strategy to seek growth away from environmentally sensitive locations – including flood zones, and those which are ecologically sensitive.	Comments noted.

Summary of Comment	Council's Response
Concern that more needs to be done to deliver the planned development in Dover and Whitfield to protect other areas of the District from speculative development.	Comments noted. The Council is actively working to promote the District and encourage further investment in Dover. The Council is working with developers at Whitfield to progress this scheme.
Concerns over the assumptions made in the housing trajectory and whether its realistic that the District will deliver 657 homes per year.	The housing trajectory will be revised prior to Reg 19.
Concern about the level of greenfield development proposed – brownfield sites should be prioritised.	Where possible the Council has looked to promote brownfield development over greenfield and encourage investment in the towns. However the supply of brownfield sites in the District is constrained and the deliverability and viability of these sites is also challenging. Given this a mixture of greenfield and brownfield sites have been proposed to ensure resilience in supply.
Concern that Aylesham is being treated unfairly in relation to Sandwich, when Sandwich falls above Aylesham in the settlement hierarchy and has better infrastructure, services and facilities. Aylesham should be treated more equitably	The distribution of housing growth in the District is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Sandwich is highly constrained which has led to less suitable housing sites being identified in this location. Future housing growth in Aylesham will be supported by infrastructure and this will be identified in the Infrastructure Delivery Plan.
Support for a dispersed housing growth strategy given the market issues in Dover and constraints in Deal and Sandwich.	Comment noted. This approach is reflected in SP2.
Support for hamlets to have a greater role in delivering small scale housing growth.	Some small scale allocations will be made in small villages and hamlets. Development in these locations should be in accordance with SP3.
Concern that the issue at Stodmarsh may effect the deliverability of the proposed housing growth strategy.	The Council is updating its evidence base in relation to Stodmarsh and the issue of nutrient neutrality and the Reg 19 local plan will address this issue moving forwards.

Summary of Comment	Council's Response
Greater development should be focussed around North Deal.	The proposals for development to the north of deal will be considered as part of the HELAA process.
A number of objections were also made to the growth of specific settlements in the District.	These comments have been noted and will be considered in relation to the proposed allocations in the Reg 19 local plan.
DDC's 2020 Local Plan (Reg 18) Sustainability Appraisal states 'The continued national policy emphasis on sustainable development means that 'housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich'. and should' maximise the development of brownfield land.' To be 'sustainable', the chosen 'hybrid' housing allocation requires the district settlement hierarchy to be altered by DDC (Elvington 12/20) and for a geographically separated greenfield new town development in Whitfield to be presented as 'Dover 'using an administrative unit 'for planning purposes' and for the cumulative and synergistic effects of traffic levels, modal split and highways environmental impact to be excluded from the assessment.	Comments noted. The justification for the housing growth strategy and site allocations is set out in the draft Reg 18 local plan and supporting evidence base.
The proposed plan for Sandwich lacks adequate housing provision to enable the town to maintain and develop its position in the settlement hierarchy. More housing sites should be allocated around Sandwich.	The distribution of housing growth in the District is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Sandwich is highly constrained which has led to less housing sites being identified in this location.
Questioned as to whether provision can be made for 42 Gypsy and Traveller pitches over the Plan period through turnover, intensification and site allocations.	The Council's strategy for meeting the needs of Gypsy and Travellers will be updated prior to Reg 19. The strategy is justified and supported by evidence.
DDC should reconsider their reliance on the Whitfield Urban Expansion (due to current delivery issues) and alternative strategies are fully considered.	A range of housing growth options were tested as part of the preparation of the draft local plan and these are set out in the SA. The justification for the selection of the housing growth strategy is set out

Summary of Comment	Council's Response
	in the draft local plan and supported by the council's evidence base.
The housing delivery patterns provide compelling evidence that DDC should be proactively seeking to identify growth in Deal that can help mitigate the delivery issues at Dover. In this regard, there are sites in Dover that have been allocated for development for some time and failed to come forward to date and yet are still retained as allocations. Moreover, the level of services provided in the settlements of Aylesham, Elvington and Eythorne and their position in the settlement hierarchy does not align with the proposed growth compared to that assigned for larger more sustainable settlements such as Deal. In order for the proposed housing distribution to accord with DDC's growth strategy there should therefore be a greater focus on housing delivery in Deal.	The distribution of housing growth in the District is primarily based on the settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Deal is highly constrained which has led to less suitable housing sites being identified in this location.

Summary of Representations – Comments Objecting to SP2 by Theme

Scale of Development	11
Distribution of Development	40
Availability of housing for local people's needs	25
Highways	78
Infrastructure (incl healthcare, schools, community facilities)	53
Lack of local services/amenities	31
Public transport provision	20
Footpaths/walking provision/pedestrian safety/cycling provision	27
Loss of greenfield land	43
Climate change/pollution/flooding	23
Natural environment/landscape/biodiversity	39
Flooding concerns	8
Character of area/sense of community	21
Lack of employment	12
Water supply	3

Summary of Proposed Changes

- Housing Trajectory will be revised
- Garden Village principles to be added

Strategic Policy 3: Residential Windfall Development (Reg 19 Policy SP4)

In total 33 comments were made on Policy SP3. A summary of the representations received and the council's response to these representations is set out below.

Main Issues Raised

In total 33 representations were made to this Policy by 29 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP17
Mr Ross Miller	Masterton Robin Designs Ltd	DLP122
Finns Ltd	(on behalf of) Mrs June House	DLP292
Mr Martin Brandon		DLP1330
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1878
Dr Sharon Danby		DLP576
Mr David Stewart		DLP621
Mark James		DLP675
Kelly Lawrence	Deal Town Council	DLP2102
Katie Miller	Kent Downs AONB	DLP1470
Sarah Slavin		DLP846
Iwan Jones	JIG Planning and Development Ltd	DLP2958
Mr Kevin Lynch	Worth Parish Council	DLP1852
Mr Kevin Lynch	Worth Parish Council	DLP1854
Mr Kevin Lynch	Sholden Parish Council	DLP1868
DHA Planning	On behalf of Glen Miles Knights PLC	DLP1703
Chris Moore	Archers Court Road	DLP1918
Barbara Cooper	Kent County Council	DLP1721
Elizabeth Welch	Hobbs Parker (on behalf of Beat Hochstrasser)	DLP1126
Christine Haggart	Ash Parish Council	DLP1169
Patrick Murfet	Bee Equipment Ltd	DLP1171

Yvette Williams		DLP1260
Seb Willett	Langdon Parish Council	DLP1241
Barratts	On behalf of Luke Cooper	DLP3630
Richard Follett	Willmarsh Developments Ltd	DLP3644
Hume Planning	On behalf of Mr and Mrs Van Pettegem	DLP3612
Carl Thomason	Sunning Dale	DLP3607
Marnie Caton	Sandwich Environmental Conservation Group	DLP3327
Hume Planning	On behalf of Mr and Mrs Mullaney	DLP3617
Hume Planning	On behalf of Green Oak Farm Ltd	DLP3608
Mrs Klaire Lander		DLP3559
Derek Leach	The Dover Society	DLP3000
Shelley Morris		DLP3249
Sarah Gleave	Dover and Deal Green Party	DLP3745

Summary of Representations – Main Issues	Council's Response – Proposed Changes
4 representations supported this Policy	Comments noted and welcomed.
Wording of this policy lacks certainty in interpretation and meaning. Given the existing size of Dover and Deal and to a lesser extent Sandwich a commensurate scale of development could easily be 100 houses or more. Policy should include a maximum number of dwellings, say 10, where a site is adjacent to but outside of settlement confines.	As these towns represent the most sustainable settlements in the District, restricting the scale of any windfall development would not be in accordance with national policy. To prevent existing services and facilities becoming unacceptably overloaded however, the criteria set out in this Policy, with which all windfall development proposals will be required to comply, include the requirement that the scale of any such development takes account of the cumulative impact of allocated sites and other

	<p>developments with planning permission within the settlement. In addition, the wording of the policy will be amended to clarify the position with development outside but adjacent to the confines of settlements that lie within the Kent Downs AONB.</p>
<p>Regulation 19 Consultation should include an opportunity to make responses on the proposed revised Settlement Boundaries to give land and property owners the option of whether they want their land included within the boundary or not.</p>	<p>Proposed settlement confines (boundaries) have been prepared. Parish Councils have been consulted on these during September 2021. Consultation on the Regulation 19 Local Plan in Spring 2022 will include the opportunity to make representation on the settlement confines.</p>
<p>Policy almost makes the boundaries meaningless. Taking it to an extreme, developers could infill between settlements</p>	<p>Policy wording is clear that development is only permissible inside or adjoining the settlement boundaries of listed settlements and that outside of such areas new residential development will only be permitted in exceptional circumstances, in accordance with national policy and guidance. Criteria b) of the Policy specifically states that development should not result in coalescence or the significant erosion of gaps between settlements.</p>
<p>As the proposed policy wording requires development to be commensurate with the scale of the existing settlement, then why is it restricted to within the confines only of these smaller settlements? The wording 'within or adjacent to' should be used for all the listed settlements so as not to preclude an opportunity where a suitable modest development may meet a local need, for example, affordable homes.</p>	<p>The settlements in the second tier of this policy are smaller in scale, and with a more limited range of services and facilities, than the first tier. The approach to the smaller villages and hamlets is considered to appropriately protect the character of</p>

<p>Remove the requirement for windfall development to only be within the settlement boundaries of the second tier of settlements.</p> <p>The settlement hierarchy is far too rigid; windfall development and infilling should be considered on a case by case basis.</p>	<p>these settlements, and to reflect the less sustainable nature of the services available in these villages and hamlets, whilst allowing limited organic growth.</p> <p>Rural Local Needs Housing developments come forward on exception sites, and therefore the requirements of this Policy will not prevent such schemes from being supported. Local Needs Housing is the subject of Policy DM13, and proposals will therefore be assessed against it.</p>
<p>Should continue the current approach, with windfall development being approved within designated settlement areas only. The draft plan gives no justification for its assertion that this is too restrictive. The proposal in the draft plan will just result in more loss of greenfield land.</p> <p>Residential windfall development of sites adjoining but outside of village boundaries beyond those sites that are allocated in the final plan should not be permitted in order to protect the setting of villages/urban areas.</p> <p>Reword policy to protect rural settlement boundaries as existing.</p>	<p>Restricting development to within settlement boundaries only would conflict with the national approach to sustainable development in rural areas as set out in the NPPF.</p> <p>The existing boundaries of rural settlements are based on survey work carried out in 2008 for the Settlement Hierarchy that formed the basis of the Dover Core Strategy (2010) and reassessed as part of the preparation of the Dover Land Allocations Local Plan (2015) Given the restrictions resulting from the global COVID-19 pandemic, updating such survey work for the Regulation 18 Draft was limited. Survey work has therefore been undertaken as part of the preparation of this Regulation 19 Dover District Local Plan to accurately reflect the</p>

	nature of the built confines of settlements at the time of writing, including taking account of any changes due to developments that have occurred since these previous Plans.
Windfall development 'immediately adjoining existing settlement boundaries' should not be allowed in Deal or Walmer. There has been so much housing development already around Deal, most of it deeply damaging to existing residents and impacting on the landscape.	Deal and Walmer are highly sustainable settlements where national policy advocates locating development. To restrict development on the edges of these towns would therefore not comply with national policy. The criteria of SP3 are clear that significant harm to the living conditions of adjoining existing residents or to landscape character will not be permitted from any development coming forward under this policy.
Windfall development should not be allowed where it has a significant adverse impact on the living conditions of existing adjoining residents.	The criteria of SP3 are clear that significant harm to the living conditions of adjoining existing residents will not be permitted from any development coming forward under this policy.
Settlements within or surrounded by the AONB (such as Alkham, Capel-le Ferne and St Margaret's at Cliffe) should be moved into the second part of the policy that only allows for infill development.	Policy amended to clarify approach required for settlements in, or surrounded by, the AONB.
A criterion should be added to the first part of the policy which does not permit development outside the settlement boundaries if it is within the AONB.	Policy amended to clarify approach required for settlements in, or surrounded by, the AONB.
Given that windfall housing has already contributed significantly to the provision of new dwellings in the District there must be some reservation about the capacity of the rural areas to deliver much more.	Comments noted. Capacity of the rural areas to contribute to the housing need of this Plan is set out in Policy SP2 and its supporting text.
Suggest change of wording to Criteria b "It is compatible with the layout, fabric and appearance of the existing settlement <u>and avoids inappropriate densification</u> ".	Comments noted. Current use of the word density is considered to adequately reflect the requirement of this criteria.

<p>Whitfield should be added to list of settlements where windfall development is acceptable</p>	<p>For the purposes of this policy Whitfield is considered to fall within the urban area of Dover. The supporting text has been changed to make this clear.</p>
<p>SP3 should allow for windfall development on brownfield sites in the countryside</p>	<p>The policy wording, and its supporting text, makes clear that residential development coming forward in the countryside, outside of settlement boundaries, will be assessed against national planning policy and guidance which allows for such development only in exceptional circumstances.</p>
<p>DDC should allocate further sites that are deliverable within the first five years of the Plan period to ensure that the number of windfall sites does not conflict with the objectives of the Local Plan. By allocating further deliverable sites in the early stages of the Plan period, the over-reliance of delivery at large strategic sites is less. This will alleviate the risk of windfall development leading development in the area and risking the delivery of the overarching objectives.</p>	<p>Policy SP2 and its supporting text clarifies housing delivery planned for the Plan period. One of the key elements of the Plan is the allocation of a sufficient amount and variety of land for housing across the District to ensure the delivery of a continuous supply of housing across the Plan period and that the Council maintains a five year housing land supply in accordance with national policy, and choice and competition in the housing market in the District. Windfall development is an important element of housing supply.</p>
<p>As drafted, this Policy does not fully account for changing housing needs in future and instead refers only to 'residential development or infilling of a scale commensurate with that of the existing settlement'. It is important that this Policy is re-drafted to more appropriately reflect changing (and in most likely cases, increasing) housing need over the plan period at this point 19 years into the future. To retain reference to existing settlement form and scale as a</p>	<p>As set out in the supporting text to Policy SP2, national policy requires Local Plans to provide, as a minimum, for the objectively assessed housing need for housing within the district over the Plan period. This process</p>

<p>measure of the suitability of residential development risks the under delivery of development in future in otherwise sustainable locations</p>	<p>takes account of changing housing needs over the Plan period. Settlement form and scale, including the facilities and services enjoyed by a settlement, define its sustainability and therefore its suitability for windfall development and therefore form the basis of Policy SP3.</p>
<p>This Policy must also be applied to COU applications.</p>	<p>Changes to the Permitted Development regulations in recent years have removed much change of use development from the requirement to gain planning permission. In cases where permission for change of use to residential development is required, applications will be assessed against this policy.</p>
<p>A number of site-specific representations are made against this Policy referring to site allocations KIN002, EYT003, EYT009 and EYT012, SHE003, SHE004, SHE006 and SHE008 and STA004.</p>	<p>Site specific representations are responded to under the relevant site allocation policy.</p>
<p>It is unacceptable for Dover urban area to provide no affordable housing because of the LP whole viability study. Strategic Policy 3 should be amended in the case of planning applications on developments of over 8 dwellings on windfall development sites, within 3 miles of the boundaries of Deal and Walmer, to state that permission will only be given if the applicant has previously undertaken a development of a similar scale within Dover Urban area which provides a minimum of 30% affordable housing.</p>	<p>Comments noted. The suggested amendment is not considered to be compatible with paragraphs 56 or 57 of the NPPF (2021). See Affordable Housing policy section.</p>

Summary of proposed changes:

- Policy will be amended to clarify approach required for settlements in, or surrounded by, the AONB.
- Settlements will be reviewed through an update to the settlement hierarchy and confines
- The policy has been updated with additional criteria.

Note: In the Regulation 19 Plan, Sites allocated for development are now separated out in to more detailed, individual site policies and are then grouped by settlement in a new 'Settlements' chapter which includes background of the settlement and a map. This includes previous strategic site policies such as Whitfield, and employment sites. Each site now has a specific reference with the exception of housing sites under 30 units which are grouped into small sites policies relevant to each settlement. There have been a number of site changes since the Regulation 18 version of the plan, with some sites deleted, capacity amended or new sites added.

Strategic Policy 4: Whitfield Urban Expansion (Reg 19 – Policy SAP1)

In total 32 representations were made on this policy by 28 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Richard Ledgerwood	n/a	DLP2, 45
Peter Jull	n/a	DLP20
Mr William Donaldson	n/a	DLP132
Mr Nigel Wadey	n/a	DLP262, 265, 266
Mr Ross Miller	n/a	DLP421
Ms Joanne Pannell	Tilmanstone Parish Council	DLP1274
Mrs Sue Ward	British Horse Society	DLP308, 1329
Margaret Kemp	n/a	DLP2961
Dickie Willis	n/a	DLP627
Sonja Watsham	East Kent Climate Action	DLP2571
Sarah Gleave	Green Party	DLP2797
Ms Bridget Fox	The Woodland Trust	DLP1130
Tamzyn Janes	Southern Water	DLP1601
Julie Davies	CRRE	DLP3703
Mr Adam Wadey	n/a	DLP1294
	Danescroft Land Ltd	DLP1566
Mr Nathan Burns	Natural England	DLP1424
Mr Alan Byrne	Historic England	DLP1646
Martin Hart	Pentland Homes	DLP1504

Chris Moore	Plainview	DLP3650
Barbara Cooper	Kent County Council	DLP1723
	Persimmon Homes	DLP1613
	Halsbury Homes	DLP1619
Keith Holness	Nonington Parish Council	DLP2182
Kevin Bown	Highways England	DLP1787
Sophie Inns	Quinn Estates	DLP3637
Cllr Edward Biggs	DDC Ward Councillor Town and Castle Ward	DLP1991
Kelly Lawrence	Deal Town Council	DLP2103

5 respondents stated that they agreed with the proposed allocation of this site and 15 respondents stated that they objected to its allocation. 8 respondents neither agree or object but have made comments.

Main Issues Raised

Issues raised in relation to the site as a whole

- The site is not accessible to the nearest train station by public transport or walking/cycling due to the terrain
- Non sustainable – encourages car dependency
- Concern raised regarding garden village principles conflicting with policy DM36 and should therefore be removed
- Density out of proportion, harmful to the character of the local area contrary to SP15
- Development will result in further decline of Dover Town due to business and leisure facilities moving to Whitfield, with no mitigation proposed for Dover Town.
- Development should be capped to 3000 until development sites in 5 Dover wards have been developed
- Loss of green space surrounding Whitfield village
- Harmful to the visual quality and rural character of the countryside, harmful to the natural environment, contrary to DM1 and DM15 of Core Strategy and section 170 and 175 of NPPF
- Dover has an ageing population which rely upon public transport, should therefore be focusing on Dover Town and not building at Whitfield
- The parish of Church Whitfield should be kept separate from the main village and the plans for the cemetery overflow and rest of field should remain undeveloped
- Impact on Bridleway ER128 and ER97 and surrounding rural routes which are unsuitable for increased usage by road traffic. Need to consider how to retain and enhance the PROWs in accordance with NPPF.

- Southern Water identify need for new wastewater infrastructure and advise that the development will need to be phased to take this into account. There is also existing infrastructure that crosses the site. They recommend specific wording be added to the policy in this regard.
- The site falls within the immediate setting of the AONB and must be designed to conserve and enhance the character of the Kent Downs AONB.
- KCC Education Requirements to be addressed
- Financial contribution towards waste facilities required.
- Policy needs to be more robust with stringent conditions on developments to ensure development happens as planned.

Highways

- The main constraint to delivery is provision of capacity on the A2
- KCC encourages an upgrade on footpath ER68 to a bridleway with the development for cycling use.
- Mitigation should be proportionate on PROW
- KCC request consideration for an active travel link from of a link from Singledge Farm to Bridleway ER128 to Temple Ewell and station
- Highways England have stated that additional mitigation will need to be discussed and implemented for the later phases of development

Housing provision/use of greenfield land

- Vacant property should be occupied before building on greenfield land
- Recent change in planning emphasis from the south east to the north should result in a reduction in number of homes needed and not increase
- Because of Brexit and environmental issues such as global warming, we should be much more sustainable and increase land use for food rather than bring so much of our food across continents
- CPRE have commented that this is a significant loss of best and most versatile agricultural land

Support

- The site represents a logical and sustainable location to direct growth

Issues raised in relation to the proposed additional land

- Significant adverse impact upon setting of three listed buildings Temple Farm, Singledge Farm House and Singledge Manor. Mitigation required to preserve open setting of listed buildings through revisions to boundary of the land allocation.
- Impact upon Ancient Woodlands of Singledge Wood, Captains Wood and Waddling Wood by building up to their boundaries
- Suggestion that policy includes specific reference to the need to both protect and enhance irreplaceable habitats.

- A minimum 50 metre buffer should be maintained between a development and the ancient woodland, including through the construction phase, unless the applicant can demonstrate very clearly how a smaller buffer would suffice.
- Significant adverse impact upon Lydden and Temple Ewell SAC
- Impact on Historic Park of Waldershare contrary to draft Policy DM48
- Need for additional housing land is not justified and is premature, given the slow delivery of existing allocation
- Would result in blight to surrounding property when delivery of existing allocation is uncertain
- Uncertainty around the delivery of required transport infrastructure needed to support the development
- Impacts upon existing public rights of way.
- Impact of increasing traffic on surrounding area including use of Singledge Lane for rat running, resulting in unacceptable harm to character and danger to vulnerable users
- Impacts on settlements of Eythorne and Coldred
- Homes would be reliant upon use of private car with no access to public transport
- Detrimental impact upon the three certificated locations for touring caravans on Singledge Lane
- Risk of flooding as a result of housing increasing run-off
- No provision for sewerage facilities
- Natural England advises that the revised Supplementary Planning Document (SPD) should be informed by a Landscape and Visual Impact Assessment (LVIA)
- Additional mitigation will need to be discussed and implemented for the later phases of the development at Whitfield and the land to the north-west, to ensure the performance at the Duke of York and Whitfield roundabouts.

General Issues Raised

Issues	Number of responses
Density of housing	3
Tree Planting	1
Highways concerns	5
Public transport concerns	4
Schools capacity	1
Healthcare capacity	1
Community Facilities	1
Lack of local shops/services	4
Habitats impact	5
Heritage Impact	6
Landscape impact	6
Character of area impact	3
Agricultural Land/Loss of Green Spaces	6
Sewerage	3

Flooding	2
PROW/Cycle facilities	3

Summary of Proposed Changes:

- The Urban Expansion of Whitfield is currently allocated in the Core Strategy 2010 and covered by the Whitfield SPD. Parts of the site are also subject to planning consent, with some development already taken place. To support the allocation of this site in the Local Plan the Whitfield SPD is currently being updated and further transport modelling work is also being undertaken.
- With regards to the additional land proposed this will mainly be used to provide open space to serve a variety of purposes, including biodiversity enhancements, landscape buffer zones etc. This will allow an increase in the capacity of the existing site to accommodate an additional 600 homes.
- Criteria will be added to the policy to address the impact on the adjacent listed buildings and ancient woodland.
- Criteria will be added to the policy requiring a LVIA to be undertaken to minimise the impact on the landscape
- Criteria will be added to the policy requiring appropriate species and habitat surveys to be carried out.
- Criteria will be added to the policy requiring SANGs to be provided to mitigate the impact on the Lydden to Temple Ewell SAC.
- Criteria will be added to the policy to deal with the risk of surface water flooding
- Criteria will be added to the policy requiring a Transport Assessment to be carried out to support the development, in addition to on and off-site sustainable transport measures and improvements to the public rights of way network.
- Criteria will be added to the policy concerning waste water.

Strategic Policy 5: North Aylesham

In total 67 representations were made on this policy by 60 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP4
Daniele Gatti		DPL152
Sue Ward	British Horse Society	DLP1311
Kunal Patel		DLP450
Nicola Kemp		DLP2236
Jane Edwards		DLP470
Siobhan Kingston		DLP2626

Alan Watson		DLP471
Annabel Pomeroy		DLP480
Diana Mouzakitits		DLP3260
Derek Leach	The Dover Society	DLP3001
Jamie Pout		DLP522
Barbara Green		DLP2476
Karen Buggins		DLP2339
Pauline & John Catterall		DLP2358
Bethan Garrity		DLP563
Tracy Jemmett		DLP2488
Judith Hawarden	Hawarden Farming	DLP2902 / DLP728
Thomas Patrick Johnstone		DLP706
CLlr Mike Sole		DLP2426
Abi Hamsher		DLP3485
Amber Harries		DLP731
Joanne Cartledge		DLP2352
Kelly Lawrence	Deal Town Council	DLP2104
Tamzyn Janes	Southern Water	DLP1603
Julie Davies	CPRE	DLP3704
Janet Holness		DLP2494
Delia Webb		DLP2550
Jean Swan	Adisham Parish Council	DLP1799
Caroline Loder-Symonds		DLP974
Mandy Gass		DLP2387
Zoe Holmes	Kent and Medway Clinical Commission	DLP996
Graham Clemas		DLP2390, DLP2391, DLP2392, DLP2396, DLP2397, DLP2398, DLP2399 (7 unique comments)
Guy Steward		DLP1404
Mr Roderick Loder-Symonds		DLP1018
Katrina Lennox-Gurr		DLP1032
Mr R Macfarlane		DLP2497

Steve Hayes		DLP2631
Julia Hayes		DLP2474
Kathleen Jenkins		DLP2384
Michael Davies		DLP1116
Barbra Cooper	Kent County Council	DLP1724
Nathan Burns	Natural England	DLP1431
Phil Wilson		DLP1123
Amy Halford		DLP2451
Kathleen Corbett		DLP2444
Lauren Gupta-Miles		DLP1156
Jo Edwards	Sport England	DLP1676
Cllr Peter Walker	DDC Ward - Aylesham, Eythorne and Shepherdswell	DLP2028
Keith Holness	Nonington Parish Council	DLP2184
Ronnie Hill		DLP2621
Marnie Caton	Sandwich Environmental Conservation Group	DLP3328
Rebecca Foad (DHA Planning)	Persimmon Homes	DLP1614
Kevin Bown	Highways England	DLP1788
Pam Harvey		DLP2432
Fiona Paterson		DLP1285
Terence Jones		DLP2414
Camilla Presland		DLP1295
David and Helen Conder		DLP2442
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2012

8 respondents stated that they agreed with the proposed allocation of this site and 42 respondents stated that they objected to its allocation. 10 neither supported or objected to its allocation but have made comments.

Aylesham general comments

The below comments are allocated against SAP1 but are relevant and have been considered by Officers in relation to the entire settlement of Aylesham.

Name	Organisation	Comment ID
Georgina Davis		DLP2466
T McColm		DLP2471

Summary of Representations – Specific Issues Raised

- The draft allocation requirements are supported. GTA Civils have carried out an initial feasibility study for development of this site, confirming that suitable vehicular access onto Adisham Road, with secondary access for pedestrians and bicycles through the existing expansion can be achieved. An ARCADY assessment of the A2-A260 roundabout shows development would not cause excessive congestion and the roundabout would still operate within capacity. Further work is ongoing and further detail will be provided ahead of the Reg19 stage. Notwithstanding this, the site is considered suitable, available and achievable for development.
- Natural England advised that DDC should seek AONB Unit advice on impacts of site, and proposed allocation of AYL003, on AONB due to proximity. Policy requirements should be strengthened to require detailed LVIA in line with GLVIA 3rd edition.
- NE also advised that the site policy should require no adverse impacts on Stodmarsh SAC, SPA and Ramsar site.
- Site will impact on a number of PROWs, so consideration should be given to how to retain and enhance those affected.
- Southern Water advised that the existing sewage network has limited capacity to accommodate the proposed new development, therefore new wastewater infrastructure would be required via the New Infrastructure charge to developers, and that the occupation of the development should be phased to align with the delivery of new wastewater infrastructure, also suggesting a criterion is added to SP5 to require this
- Kent County Council raised concerns over the impact of the development on the highway network, particularly as Aylesham has no secondary education provision so the need for travel by private vehicle for secondary school age children may be higher than in other areas of the district.
- KCC also drew attention the contributions that would be required towards community infrastructure and services, alongside extra land at St Joseph's Primary School for expansion
- Highways England advised that a Transport Assessment would be required when the site comes forward for planning permission, to understand impacts on the SRN and any mitigation required
- CPRE recommended that the site should not be included as an allocation until a further assessment of whether impact on landscape and highway and access concerns can be mitigated (both as described in HELAA assessment)
- Site boundary should be amended to allow for improvements to footpath connecting with Adisham Train Station
- Limited analysis of highways capacity and impacts on rural routes has been provided by WSP
- Need to align provision of bins/benches/postboxes with building of houses

- Could all lighting for new homes be LED or could water butts be provided for all
- Could a village hall/cafe be included within plans

General Issues Raised

Issues	Number of responses
Object to Quantity of Housing	8
Air pollution	1
Highways problems	43
Public transport concerns	18
Schools capacity	12
Healthcare capacity	22
Youth provision	14
Lack of local shops/services	23
Habitats impact	4
Landscape impact	5
Environmental Impact including Stodmarsh	12
Climate change	4
Character of area impact	7
Agricultural Land/Loss of Green Spaces	18
Sewerage	6
PROW/Cycle facilities	11
Lack of local employment	10

Summary of Proposed Changes

- Comments reviewed in detail. Site was proposed for 500 homes. Agreed that site allocation will be removed due to concerns in relation to the cumulative impact upon the highways network and significant objections from statutory bodies and residents at this stage.

Strategic Policy 6: South Aylesham

In total 63 representations were made on this policy by 61 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull	DDC Ward Cllr	DLP22
Mrs Tallulah Murphy		DLP66
Mr Dainele Gatti		DLP209

Sue Ward	British Horse Society	DLP1310
Richard Rush		DLP2890
Kunal Patel		DLP451
Robert Edmond		DLP462
Mr Alan Watson		DLP473
Mr Graham		DLP478
Mr Anthony Opie		DLP476
Diana Mouzakititis		DLP3261
Derek Leach	The Dover Society	DLP3002
Mr Jamie Pout		DLP523 / DLP252
Charmaine Perrin		DLP3180
Alison Heine	Heine Planning Consultancy	DLP3265
Bethan Garrity		DLP564
Mrs E Gander		DLP582
Kay Sutcliffe		DLP2651
Thomas Patrick Johnstone Esq		DLP709
Philip Sutcliff		DLP2649
Mrs Abi Hamsher		DLP3651
David Cook		DLP725
Amber Harries		DLP730
Marilyn Lewis		DLP746
Karen Phillips		DLP3537
Amy Evans		DLP3298
Kelly Lawrence	Deal Town Council	DLP2105
Tamzyn Janes	Southern Water	DLP605
Lauren Tonks		DLP2600
Malcolm Tonks		DLP2601
Sharon Tonks		DLP2602
Sacha Davies		DLP878
Guy Steward		DLP924
Barbara Rampton		DLP3155
Barry Rampton		DLP3156
Isabelle Messiter		DLP3229

Adam Michael		DLP3230
Katie Razzell	Aylesham Parish Council	DLP1933 / DLP1937
Delia Webb		DLP3663
Roderick Loder-Symonds		DLP1388
Roy Perrin		DLP3178
Jo Edwards	Sport England	DLP1677
Colleen Thomas		DLP2608
Katrina Lennox-Gurr		DLP1041
Sandra Soldano		DLP1086
Claire Jeffery		DLP1097
Fiona Paterson		DLP1360
Barbra Cooper	Kent County Council	DLP1725
Nathan Burns	Natural England	DLP1432
Bridget Fox	The Woodland Trust	DLP1368
Julia James		DLP1153
Lauren Gupta-Miles		DLP3652
Cllr Peter Walker	DDC Ward Cllr	DLP2030
Keith Holness	Nonington Parish Council	DLP2186
Kevin Bown	Highways England	DLP1789
Jenna Murray	Carter Jonas LLP	DLP1248
Mark Townsend		DLP2597
Jane Townsend		DLP2598
Charles Pottle		DLP1359
Mr Michael Davies		DLP1369
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2012

5 respondents stated that they agreed with the proposed allocation of this site and 44 respondents stated that they objected to its allocation. 11 neither supported or objected to its allocation but have made comments.

The below comments are allocated against SAP1 but are relevant and have been considered by Officers in relation to the entire settlement of Aylesham.

Name	Organisation	Comment ID
Georgina Davis		DLP2466
T McColm		DLP2471
Janet Holness		DLP2494

Summary of Representations – Specific Issues Raised

- Work with Kent County Council is ongoing to assess what measures will be required to mitigate any potential impact that the development could have on the existing highways network.
- Financial contributions towards the delivery of off-site infrastructure and community facilities are acknowledged and covered in the supporting viability statement.
- The development parcels are located to the east of Ackholt Wood (with a 15 metre buffer) and the remainder of the site is available as open space
- An allocation of Gypsy and Traveller pitches was previously identified within the site, but it is now proposed to relocate this to land to the east of the railway line instead
- The land parcel to the east of Aylesham Road could therefore accommodate an element of senior living as well as a community facility and a small convenience foodstore
- AYL gypsy site identified as SAP2 Alkham on draft Policies map– needs correcting
- The Woodland Trust recommends a minimum 50 metre buffer should be required between the development and Ancient Woodland, unless the applicant can demonstrate why a smaller buffer should be acceptable
- Natural England advised that DDC should seek AONB Unit advice on impacts of site, and proposed allocation of AYL003, on AONB due to proximity. Policy requirements should be strengthened to require detailed LVIA in line with GLVIA 3rd edition.
- NE also advised that the site policy should require no adverse impacts on Stodmarsh SAC, SPA and Ramsar site.
- Site will impact on a number of PROWs, so consideration should be given to how to retain and enhance those affected.
- Southern Water advised that the existing sewage network has limited capacity to accommodate the proposed new development, therefore new wastewater infrastructure would be required via the New Infrastructure charge to developers, and that the occupation of the development should be phased to align with the delivery of new wastewater infrastructure, also suggesting a criterion is added to SP5 to require this. SW also advised that existing infrastructure crosses the site underground, which would need to be factored into the design, and easements would be required
- Kent County Council suggested that Public Footpath EE296/Cb12 could be upgraded to a bridleway, while Bridleway EE298 and Cb211 will also require improvements
- KCC advised that additional land will be required at St Joseph's Primary School for expansion, and outlined the community contributions that would be required from developers of the site

- Highways England advised that a Transport Assessment would be required when the site comes forward for planning permission, to understand impacts on the SRN and any mitigation required
- Aylesham Parish Council advised they were not previously consulted on the proposal to include Gypsy & Traveller pitches on the site
- Aylesham PC described a feeling of missing out in the past when it comes to funding and amenities, and request that the PC to have a greater say in how money is spent in Aylesham
- Aylesham PC welcomes the provision of affordable housing, but suggests that those with links to Aylesham should be given priority
- Aylesham PC asked for wooded areas, other than the Ancient Woodland at Ackholt Wood, to be protected or enhanced through development where possible
- Heine Planning supported the proposed allocation of 10 gypsy and traveller pitches, but questioned its location so close to the existing socially provided site at Snowdown, unless it is proposed to provide an extension to the existing site. Heine also suggested it is unclear how the site would be delivered or when.
- Ackholt Wood should be incorporated into a landscape masterplan, and Policy Requirement clarified to enable landscape buffering for views from the west to the site's north east corner. Also the edge of development should be a line from the corner of Ackholt Wood to Snowdown Recreation Ground.
- A new roundabout should be constructed at junction of B2046 and Cooting Road, to enable the closure to vehicles of Spinney Lane from the industrial estate to B2046 and its use for pedestrians/cyclists/equestrians
- Limited analysis of highways capacity and impacts on rural routes has been provided by WSP
- Could a village hall/cafe be included within plans
- Need to align provision of bins/benches/postboxes with building of houses
- Could all lighting for new homes be LED or could water butts be provided for all
- Page 64 - some errors: there is no direct bus service to Dover, 3 churches not 2, although each church has a church hall there is no village hall. This was to have been addressed by the provision of a village hub.

General Issues Raised

Issues	Number of responses
Object to Quantity of Housing	8
Air pollution	5
Highways problems	45
Public transport concerns	22
Schools capacity	19
Healthcare capacity	26
Youth provision	14

Lack of local shops/services	25
Habitats impact	7
Landscape impact	5
Environmental Impact incl Stodmarsh	12
Climate change/Sustainable design	9
Character of area impact	6
Agricultural Land/Loss of Green Spaces	34
Sewerage	6
PROW/Cycle facilities	12
Lack of local employment	8

Council response and Summary of Proposed Changes:

- Comments noted.
- Supporting text will be updated to reflect the comments made about service provision.
- Criteria will be added to the policy requiring a Transport Assessment to be carried out to support the development, in addition to on and off-site sustainable transport measures and improvements to the public rights of way network.
- Criteria will be added to the policy setting out development contributions required.
- The policy criteria concerning the impact on the ancient woodland will be strengthened.
- Criteria will be added to the policy requiring a LVIA to be undertaken to minimise the impact on the landscape and the AONB.
- Criteria will be added to the policy to deal with the risk of surface water flooding
- Criteria will be added to the policy concerning waste water.

Strategic Policy 7: Eythorne and Elvington Local Centre

In total 119 representations were made on this policy by 85 consultees.

Representations were received from:

Name	Organisation	Comment ID
Ms Paulette Butcher		DLP7
Mr Robert North		DLP10
Peter Jull		DLP107
Mrs Lynn Regan		DLP207
Matt Cook		DLP224
Miss Jenna Gill		DLP228

Miss Chrissy Grimsdale		DLP232
Miss Chrissy Grimsdale		DLP233
Miss Chrissy Grimsdale		DLP234
Sophie Grimsdale		DLP238
Sophie Grimsdale		DLP239
Sophie Grimsdale		DLP240
Sophie Grimsdale		DLP241
Miss Danielle Hyden		DLP258
Mark James		DLP272
Mr Luke Whitehouse		DLP273
Mr Luke Whitehouse		DLP274
Mr Luke Whitehouse		DLP275
Mr Luke Whitehouse		DLP276
Mr Luke Whitehouse		DLP277
Miss Alice Whitehead		DLP296
Miss Alice Whitehead		DLP297
Miss Alice Whitehead		DLP298
Mr Martin Botten		DLP309
Mr Steven Harding		DLP326
Mr David Dixon		DLP327
Mrs S Howe		DLP329
Mrs S Howe		DLP330
Mrs S Howe		DLP331
Mr Glenn Huggett		DLP387
Mr Glenn Huggett		DLP388
Mr Glenn Huggett		DLP389
Mrs Sandra Wright		DLP394
Mr Peter Stevens		DLP399
Mrs S Howe		DLP410
Mrs S Howe		DLP411
Mrs S Howe		DLP412
Elizabeth Stephens		DLP415
Mrs Jennifer Martin		DLP440
Mr John Brown		DLP596
Mr Josh Walton		DLP697
Mr Josh Walton		DLP699
Mr Josh Walton		DLP700
Miss Zoe Pennington		DLP708
Mr Charles Baynes		DLP802
Miss Lesley Steward		DLP813
Mr Kevin Aubrey		DLP819
Miss Zoe Pennington		DLP900

Miss Zoe Pennington		DLP902
Miss Zoe Pennington		DLP903
Miss Zoe Pennington		DLP904
Mrs Polly Lockie		DLP919
Philip Rogers		DLP960
Mrs Kirsten Bridges		DLP986
Mrs Kirsten Bridges		DLP988
Richard Ledger		DLP1019
Miss Samantha Long		DLP1025
Miss Samantha Long		DLP1027
Mrs Micheline Shether		DLP1036
Mrs Micheline Shether		DLP1039
Mrs Katie Gibbs		DLP1062
Benjamin Timson		DLP1098
Mrs Claire Jeffery		DLP1101
Benjamin Timson		DLP1102
Benjamin Timson		DLP1103
Miss Tanya Clark		DLP1200
Miss Tanya Clark		DLP1202
Miss Tanya Clark		DLP1207
Alastair Clark		DLP1255
Alastair Clark		DLP1258
Alastair Clark		DLP1266
Mr George Addis		DLP1364
Miss Samantha Long		DLP1416
Miss Samantha Long		DLP1417
Mrs Claire Jeffery		DLP1422
Mrs Claire Jeffery		DLP1423
Mr Nathan Burns	Natural England	DLP1433
Tamzyn Janes	Southern Water	DLP1608
Jo Edwards	Sport England	DLP1678
Barbara Cooper	Kent County Council	DLP1726
Kevin Bown	Highways England	DLP1790
Caroline Vincent	Eythorne Parish Council	DLP1843
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2013
Cllr Peter Walker	DDC ward - Aylesham, Eythorne and Shepherdswell	DLP2034
Kelly Lawrence	Deal Town Council	DLP2106
Keith Holness	Nonington Parish Council	DLP2187
Yvonne and Norman Balch		DLP2253
Alex Bardsley		DLP2258
Kerry Bardsley		DLP2260
Glynis Barker		DLP2261

A J Barter		DLP2267
Bridget Brown		DLP2335
D J Brown		DLP2337
Joseph Clayton	Tilmanstone Colliery Welfare Scheme	DLP2389
Richard Clements		DLP2407
John Horsfall		DLP2434
Lizzi Stephens		DLP2752
Virginia Skinner		DLP2765
Steve Skinner		DLP2767
Finlay Skinner		DLP2768
Dr Caroline Greville		DLP2873
Carlie Wilcock		DLP2886
Anita Hoskins		DLP2928
Derek Leach	The Dover Society	DLP3003
Ian Rogers		DLP3044
Nicola Plews		DLP3169
Marjorie Ovenden		DLP3194
David Nash		DLP3222
Linda Nash		DLP3223
Diana Mouzakititis		DLP3257
Diana Mouzakititis		DLP3259
Mark Heath		DLP3526
Mr Robert Edmond		DLP3654
Mrs Rosemary May		DLP3672
Janet Holness		DLP3675
Mrs Annette Whitehead		DLP3678
Malcolm Whitehead		DLP3679
Miss Tayla Barry		DLP3686
Miss Tayla Barry		DLP3687
Mr Tracy Hawkes		DLP3699

3 respondents stated that they agreed with the proposed allocation of this site and 111 respondents stated that they objected to its allocation. 5 neither supported or objected to its allocation but have made comments.

The below comments are allocated against SAP1 but are relevant and have been considered by Officers in relation to the entire settlement of Eythorne and Elvington.

Name	Organisation	Comment ID
Robert Stevenson	Diocese Of Canterbury	DLP1406
Cllr Edward Biggs		DLP1971
Mrs Patricia Smith		DLP3655
Dave White		DLP2543

Summary of Representations – Main Issues

- The proposed allocation of EYT009 as part of SP7 is supported including the higher number of 195 dwellings identified. The Strategic Allocation will enable focused growth in a logical manner which recognises the position of Eythorne and Elvington within Dover District and their existing range of services and facilities.
- The Policy states that a masterplan is required for the site, which should be prepared by the landowners of all three sites (EYT003, EYT009 and EYT01) and that thereafter, all development should accord with the masterplan. It is recognized that one of the landowners is the Council, however there are several factors that can occur unexpectedly (such as death and resulting probate) which could severely impact the provision of an agreed masterplan between three parties and delay deliverability of the site, despite the best attempts of all parties. It is therefore suggested that instead of a masterplan, a Development Brief be drawn up for the Strategic Allocation as a whole, which addresses site access, drainage, main vehicular and pedestrian linkages between the sites and the remainder of Eythorne, site mix, density, provision of community facilities, open space and playspace provision, design standards and landscaping. This could be prepared by the Council in association with the relevant highways and drainage authorities and set parameters for the development and phased delivery of the site
- Natural England advised that DDC should seek AONB Unit advice on impacts of site, due to proximity to AONB. Policy requirements should be strengthened to require detailed LVIA in line with GLVIA 3rd edition.
- Southern Water advised that the existing sewage network has limited capacity to accommodate the proposed new development, therefore new wastewater infrastructure would be required via the New Infrastructure charge to developers, and that the occupation of the development should be phased to align with the delivery of new wastewater infrastructure. SW also advised that existing infrastructure crosses the site underground, which would need to be factored into the design, and easements would be required
- Kent County Council identified concerns with geometrically constrained local access routes, in particular those needed to access the A2, and the lack of junction capacity analysis at the Shooters Hill junction, meaning further assessment would be required to understand whether the effects of development could be mitigated.
- KCC identified that improvements would be required to EE337 & EE338 to connect to the industrial estate
- KCC also drew attention to the contributions that would be required towards community infrastructure, including 1ha of land to accommodate the expansion of Sibertswold Primary School

- Highways England advised that a Transport Assessment would be required when the site comes forward for planning permission, to understand impacts on the SRN and any mitigation required
- Limiting development to 350 houses makes inefficient use of land contrary to the NPPF. Even at 30 dwellings per hectare this area can accommodate 600 dwellings. A higher density than that should be targeted.
- The owner of the land between the southern corner of the site and Wigmore Lane has indicated that it might be available to provide direct access to Wigmore Lane and the A256 without traffic having to go through the village where part of the route is only single track with alternate working. The road layout of the masterplan should allow for this access to become available in the future. There should be proactive engagement with Kent Highways and the landowner to clarify the possibility of this link making this allocation more acceptable in traffic terms.
- I would like to also speak about the railway line in Eythorne which used to be used to connect the villages, Shepherdsweil and Tilmanstone as part of the local colliery. This now has become one of the few tourist attractions in the area and building additional houses which would totally encompass the railway line would completely alter this beautiful site and take away the villages heritage.
- Woodpecker Court's existence is not acknowledged in the plan, therefore the concerns for safeguarding it's students have clearly not been considered.
- This proposed area runs alongside the old pit path, which is an important part of the villages heritage and would be surrounded by properties, taking away the nostalgia the path has when walking on it, surrounded by hedgerow as it would've been when the pit was open.
- The methodology employed in Dover Rural Settlement Hierarchy 2020 SA to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and / or train station. That is it. No analysis of commuting patterns, baseline traffic, modal split or journey to work data was considered. Neither was ONS Travel to Work Census data for Elvington shows 89% journeys are in private vehicles of while only 2.5% were by bus and 3 % by train.
- The proposed Strategic and Development plans for Aylesham and Elvington are not justified because proportionate evidence has not been used in ascertaining the traffic impacts. Aylesham and Elvington were outside the DDTM area and only ATM data on B0246 was collected.
- The information already put out about this area at the beginning of the consultation was incorrect. Eythorne was supposed to have three pubs, two village halls, and a cafe. Not quite correct because there is one pub, no cafe and two church halls (not the same as village halls which are open to anyone)

General Issues Raised

Issues	Number of responses
Object to Quantity of Housing	8
Air pollution	7
Highways problems	60
Public transport concerns	18
Schools capacity	27
Healthcare capacity	15
Youth provision	1
Lack of local shops/services	17
Habitats impact	22
Landscape impact	15
Environmental Impact incl flooding	13
Climate change/Sustainable design	3
Character of area impact	25
Agricultural Land/Loss of Green Spaces	14
Sewage	6
PROW/Cycle facilities	8
Lack of local employment	7
Water capacity	3

Council response and summary of proposed changes

- Comments noted.
- Supporting text will be updated to reflect the comments made about service provision.
- Criteria will be added to the policy requiring a Transport Assessment to be carried out to support the development, in addition to on and off-site sustainable transport measures and improvements to the public rights of way network.
- Criteria will be added to the policy to investigate the opportunity to deliver further site access via Wigmore Lane.
- Criteria will be added to the policy setting out development contributions required.
- Criteria will be added to the policy requiring a LVIA to be undertaken to minimise the impact on the landscape.
- Criteria will be added to the policy to deal with the risk of surface water flooding
- Criteria will be added to the policy concerning waste water.

Note: In the Regulation 19 Submission Plan, sites allocated for development are now separated out in to more detailed, individual site policies and are then grouped by settlement which includes background of the settlement and a settlement map. This includes previous strategic site policies such as Whitfield and employment sites. Each site now has a specific reference with the exception of housing sites under 30 units which are grouped into small sites policies relevant to each settlement.

Site Allocation Policy 1: Non-Strategic Housing Allocations

ALK003

In total 6 representations were made on this site by 6 consultees. Representations were received from:

Name	Organisation	Comment ID
Messrs Barnes	Hobbs Parker	DLP1108
Katie Miller	Kent Downs AONB	DLP1472
Mr Trevor Johns		DLP16
Clerk	Alkham Parish Council	DLP2055
Tina Matcham		DLP2629
Keith Lawrence		DLP268

1 respondent stated that they agreed with the allocation of this site and 3 respondents stated that they objected to its allocation.

Specific issues raised

- AONB unit - no objection, subject to inclusion of specific criterion requiring the retention of existing trees and providing more detail on the landscape buffer (along the southern and eastern boundaries and to be in the form of structural tree planting).

General issues raised

Issues	Number of responses
Unsuitable for housing	2
Highways problems	3
Lack of local shops/services	2
Tree/landscape impact	2
Flooding	2
Character of area impact	2
Sewerage problems	1
AONB	2

ASH003

In total 1 representations were made on this site by 1 consultees. Representations were received from:

Name	Organisation	Comment ID
June House (Finns)	Jack Foat Trust	DLP402

1 respondents stated that they agreed with the allocation of this site and no respondents stated that they objected to its allocation.

Specific issues raised

No specific issues raised.

General issues raised

No general issues raised.

ASH004

In total 4 representations were made on this site by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull	DDC Councillor	DLP119
Nathan Burns	Kent and Sussex Natural England	DLP1457
Tamzyn Janes	Southern Water	DLP1557
Sue Ward	British Horse Society	DLP279

1 respondents stated that they agreed with the allocation of this site and 1 respondents stated that they objected to its allocation.

Specific issues raised

- Natural England notes that this allocation falls within the Stodmarsh Surface water catchment. As such as recommended in the Dover local Plan HRA we strongly advise your policy include a requirement for the development to demonstrated in accordance with the Habitat Regulations, that any proposal will not adversely affect the integrity of the Stodmarsh SAC, SPA, Ramsar site and SSSI such as by achieving nutrient neutrality.
- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development

is phased to align with the delivery of new wastewater infrastructure. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment.

- British Horse Society - ASH004 would impact adversely on bridleway EE464. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded. Consideration should be given to how to retain and enhance the PROWs affected by building in accordance with the NPPF. It would therefore have been helpful to have included PROWs on the land allocations maps.

General issues raised

- Detailed site masterplan and policy required that removes potential for ransom strips.

ASH010

In total 4 representations were made on this site by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Christine Haggart	Ash Parish Council	DLP1181
Joe O'Sullivan	AAH Planning	DLP1409
Tamzyn Janes	Southern Water	DLP1558
Sarah Gleave	Dover & Deal Green Party	DLP2799

1 respondents stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific issues raised

- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated

with the provision of necessary infrastructure, and does not contribute to pollution of the environment.

General issues raised

- The site is not allocated in the Ash NDP
- Site does not have planning permission.
- Habitats assessment required.
- On site childrens play area required.
- Impact on character of the area site and is unsustainable in terms of commitments to climate and ecological emergency

ASH011

No representations were made on this site.

ASH014

In total 1 representations were made on this site by 1 consultee. Representations were received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1559

The respondent did not state whether they agreed with the allocation of this site or objected to it.

Specific issues raised

- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Connection of new development at this site ahead of new infrastructure delivery could lead to an increased risk of flooding unless the requisite works are implemented in advance of occupation. Planning policies and conditions, therefore, play an important role in ensuring that development is coordinated with the provision of necessary infrastructure, and does not contribute to pollution of the environment.

General issues raised

No general issues were raised

ASH015

No representations were made on this site.

AYL001

In total 12 representations were made on this site by 12 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Jamie Pout		DLP524
Bethan Garrity		DLP562
Terri Watson		DLP1140
Tamzyn Janes	Southern Water	DLP1560
Anna Betts		DLP2293
Andrew Smith		DLP2494
Ellie Garrity		DLP2711
Rebecca Garrity		DLP2718
Tina O'Shaughnessy		DLP3195
Hayley Nash	Early Years Alliance, Sunshine Corner Nursery	DLP3220
Janet Holness		DLP2494
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdsweil	DLP2012

No respondents stated that they agreed with the allocation of this site and 10 respondents stated that they objected to its allocation.

Specific issues raised

- Southern water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required. We recommend the following key consideration. Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.
- Early Years Alliance - are looking at after the pandemic to apply to make a forest school in this area to support the needs of the nursery and the community within the village.

General issues raised

Issues	Number of responses
Highways problems	10
Impact on residential amenity	3
Lack of local shops/services	3
Habitats impact	7
Tree/landscape impact	9
Flooding	7
Character of area impact	7

Parking issues	7
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AYL002

In total 5 representations were made on this site by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1560
Georgina Davis		DLP2466
T McColm		DLP2471
Janet Holness		DLP2494
Cllr Linda Keen	DDC Ward – Aylesham, Eythorne and Shepherdswell	DLP2012

No respondents stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water is the statutory water and wastewater undertaker for Aylesham. We have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required. We recommend layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Object to housing	4
Highways problems	4
Healthcare capacity	2
Lack of local shops/services	2
Habitats impact	2
Tree/landscape impact	2

CAP006

In total 25 representations were made on this site by 24 consultees. Representations were received from:

Name	Organisation	Comment ID
Katie Miller	Kent Downs AONB	DLP1473
David Brown		DLP153
Tamzyn Janes	Southern Water	DLP1562
Esme Sparrow	Quinn Estates	DLP2059

Kerry Williams		DLP2232
Chris Pegler		DLP23
Beryl Bracegirdle		DLP2314
Lee Bracegirdle		DLP24, DLP26
Angela Godfrey		DLP2467
Sarah Hixon		DLP2521
John Scannell		DLP2794
Jennifer Rowland		DLP2894
Martyn Halls		DLP2896
Janet Hobart		DLP2907
Barry Mansfield		DLP3091
Kerry Williams		DLP31
Janet Milliken		DLP3234
Roger Hobart		DLP403
David Parsons		DLP44
Owen Wilson		DLP497
Maureen Leppard	Capel-le-Ferne Parish Council	DLP719
Linda Lever		DLP721
Peter Lever		DLP724
Paul Curtis		DLP3542

1 respondents stated that they agreed with the allocation of this site and 22 respondents stated that they objected to its allocation.

Specific Issues Raised

- Kent downs AONB unit welcome the requirement for a landscape buffer between the site and the AONB to the north west. Given the significant scale of development and intervisibility between the site and the AONB due to the sites location on high ground, we would like to see more detail specified on the landscape buffer. We also welcome the requirement for access to be from Capel Street. The AONB boundary is formed by Cauldham Lane and is a single lane carriageway, lined on both sides by hedgerow. Access from this side would be wholly inappropriate and we query if this could be made clear in the policy wording.
- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required, We recommend layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Unsuitable for housing	3

Self Build housing	1
Elderly accommodation	1
Car parking	3
Highways problems	13
Water capacity	6
Schools capacity	6
Healthcare capacity	5
Lack of local shops/services	13
Habitats impact	3
Tree/landscape impact	11
Flooding	3
Impact on AONB	1
Character of area impact	7
Agricultural land	9
Sewerage	2

CAP009

In total 15 representations were made on this site by 15 consultees. Representations were received from:

Name	Organisation	Comment ID
Sue Ward	British Horse Society	DLP1313
Maureen Leppard	Capel-le-Ferne Parish Council	DLP1353
Nathan Burns	Kent and Sussex Natural England	DLP1465
Katie Miller	North Downs Way AONB	DLP1474
David Brown		DLP153
Chris Pegler		DLP23
Angela Godfrey		DLP2465
Sarah Hixon		DLP2521
Lee Bracegirdle		DLP26
John Scannell		DLP2796
Jennifer Rowland		DLP2894
Janet Hobart		DLP2906
Janet Milliken		DLP3234
Roger Hobart		DLP398
Owen Wilson		DLP497

No respondents stated that they agreed with the allocation of this site and 13 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - CAP009/13 would impact adversely on bridleways EE253 and HE213. The British Horse Society is currently working to identify

lost PROWs or PROWs that could be upgraded on the Definitive Map. I have included a number of footpaths which are the subject of active consideration for upgrade or have the potential to be upgraded before the cut off deadline of 2026. Consideration should be given to how to retain and enhance the PROWs affected by building. It would therefore have been helpful to have included PROWs on the land allocations maps

- Natural England - Given this allocations scale and close proximity to the Folkestone Warren SSSI we advise a requirement to be implemented for an assessment of potential impact pathways for the sites interest features in line with Strategic Policy 16. Given the location the proposal should also seek to avoid or mitigate potential impacts on the Dover-Folkestone and the South Foreland Heritage Coasts, ultimately being consistent with the special character and importance of the protected landscape.
- No objection from Kent Downs Way AONB unit

General Issues Raised

Issues	Number of responses
Unsuitable for housing	2
Self Build housing	1
Elderly accommodation	1
More limited form of development	1
Highways problems	7
Water capacity	2
Schools capacity	2
Healthcare capacity	3
Lack of local shops/services	4
Habitats impact	1
Tree/landscape impact	5
Flooding	1
Character of area impact	2
Agricultural land	3
Sewerage	1

CAP011

In total 9 representations were made on this site by 9 consultees. Representations were received from:

Name	Organisation	Comment ID
Maureen Leppard	Capel-le-Ferne Parish Council	DLP1354
Katie Miller	Kent Downs Way AONB unit	DLP1475
Chris Pegler		DLP23
Angela Godfrey		DLP2469
Sarah Hixon		DLP2521
David Parsons		DLP44

Owen Wilson		DLP497
Linda Lever		DLP718
Peter Lever		DLP722

1 respondents stated that they agreed with the allocation of this site and 7 respondents stated that they objected to its allocation.

Specific Issues Raised

- The AONB Unit objects to the incorporation of this site, which lies separated and unrelated to Capel-le-Ferne and in our view would represent new development that would fail to be complementary to local settlement pattern in the AONB, in conflict with the AONB Management Plan policy SD9. The open undeveloped nature of the site together with its boundary hedgerows means that it contributes positively to the rural character of the area and constitutes part of the rural setting to Capel-le-Ferne, which given the recent development at Georges Close on the opposite side of New Dover Road, it is considered all the more important to retain. While we note that the site was previously occupied by a Petrol Filling Station, aerial imagery indicates that this only occupied the very front part of the site and was removed at least 20 years ago.

General Issues Raised

Issues	Number of responses
Self Build housing	1
Elderly accommodation	1
Parking	1
Highways problems	5
Water capacity	1
Schools capacity	1
Healthcare capacity	2
Lack of local shops/services	4
Habitats impact	1
Tree/landscape impact	3
Flooding	2
Character of area impact	1
Sewerage	1

CAP013

In total 16 representations were made on this site by 16 consultees. Representations were received from:

Name	Organisation	Comment ID
Sue Ward	British Horse Society	DLP1314
Maureen Leppard	Capel-le-Ferne	DLP1355
Katie Miller	North Downs Way AONB unit	DLP1476

David Brown		DLP153
Angela Godfrey		DLP2465
Sarah Hixon		DLP2521
Lee Bracegirdle		DLP26
John Scannell		DLP2795
Jennifer Rowland		DLP2894
Martyn Halls		DLP2896
Janet Hobart		DLP2905
Janet Milliken		DLP3234
Roger Hobart		DLP401
Owen Wilson		DLP497
Linda Lever		DLP720
Peter Lever		DLP723

No respondents stated that they agreed with the allocation of this site and 15 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - CAP009/13 would impact adversely on bridleways EE253 and HE213. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map. As I result I have included a number of footpaths which are the subject of active consideration for upgrade or have the potential to be upgraded before the cut off deadline of 2026. Consideration should be given to how to retain and enhance the PROWs affected by building in accordance with the NPPF. It would therefore have been helpful to have included PROWs on the land allocations maps.
- Kent Downs AONB unit - This site immediately abuts the Kent Downs AONB on its north-western boundary and lies on high ground that is highly visible in long distance views from the AONB. We therefore consider it essential that specific criteria are included to mitigate impacts on the adjacent AONB. This should include a more detailed specification of the landscape buffer to comprise structural tree planting and be provided along the north-western boundary, and a requirement for buildings to be designed to mitigate impacts on the AONB in terms of height and material choice.

General Issues Raised

Issues	Number of responses
Self Build housing	1
Elderly accommodation	1
Highways problems	13
Water capacity	4
Schools capacity	1
Healthcare capacity	1

Lack of local shops/services	3
Tree/landscape impact	7
AONB	1
Flooding	1
Character of area impact	2
Agricultural land	2
Sewerage	1

DEA008

In total 19 representations were made on this site by 17 consultees. Representations were received from:

Name	Organisation	Comment ID
Nicole Ardle		DLP1055
Peter Jull	DDC Councillor	DLP125, DLP136
Tamzyn Janes	Southern Water	DLP1563
Andrew Collis	Gladman	DLP1620
Chris More	Archers Court Road	DLP1923
Emily Penkett (Plainview Planning Ltd)	East Marlborough Road	DLP1959
Mike Eddy	Walmer Parish Council	DLP1990, DLP2004
Kelly Lawrence	Deal Town Council	DLP2118
Fiona Clark		DLP2376
Helen Williams	DDC Councillor	DLP2424
Sarah Gleave	Dover and Deal Green Party	DLP2800
John Hilson		DLP733
Peter French		DLP955
Ann Moyle		DLP3481
Miss Tahlia Dyer		DLP3490
Mr Tracey Hawkes		DLP3700
Julie Davies	CPRE	DLP3702

3 respondents stated that they agreed with the allocation of this site and 8 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. There are adits beneath or the proposed development site. There is a significant risk to the public water supply through migration of potential contaminants and through ground disturbance causing turbidity of the water supply. Measures to ensure protection of these sources will need to be progressed in consultation with the

local planning authority, Southern Water and the Environment Agency. The proposed development lies within a Source Protection Zone We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency. We recommend the following key consideration is added to Policy DEA008 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
No need for housing	3
Air pollution	2
Highways problems	10
Water capacity	1
Schools capacity	4
Healthcare capacity	1
Lack of local shops/services	2
Habitats impact	7
Tree/landscape impact	9
Climate change	1
Flooding	1
Character of area impact	5
Agricultural land	2
Sewerage	1

DEA018

In total 2 representations were made on this site by 2 consultees. Representations were received from:

Name	Organisation	Comment ID
Nicole Ardle		DLP1055
Tamzyn Janes	Southern Water	DLP1563

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DEA018 Layout is planned to ensure future access to existing water infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Road accessibility and impact on countryside and natural habitats around Deal in general

DEA020

In total 15 representations were made on this site by 14 consultees. Representations were received from:

Name	Organisation	Comment ID
Nicole McArdle		DLP1055
Peter Jull	DDC Councillor	DLP125, DLP136
Nathan Burns	Kent and Sussex Natural England	DLP1459
Tamzyn Janes	Southern Water	DLP1565
Mike Eddy	Walmer Parish Council	DLP1992
Edward Biggs	DDC Councillor	DLP2004
Kelly Lawrence	Deal Town Council	DLP2119
Fiona Clark		DLP2376
Sarah Gleave	Dover and Deal Green Party	DLP2800
Peter French		DLP955
Ann Moyle		DLP3481
Miss Tahlia Dyer		DLP3490
Mr Tracy Hawkes		DLP3700
Julie Davies	CPRE	DLP3705

No respondents stated that they agreed with the allocation of this site and 11 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England - Given these allocations scale and proximity to the Thanet Coast and Sandwich Bay and Ramsar site and the Sandwich Bay to Hacklinge Marshes SSSI we advise a requirement to be implemented for a project level HRA for future applications. This should consider the potential in-combination impact pathways of increased recreational disturbance, direct habitat losses, changes in air quality and increased contaminated surface water run-off.
- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. There are adits beneath or the proposed development site. There is a significant risk to the public water supply through migration of potential contaminants and through ground disturbance causing turbidity of the water supply. Measures to ensure protection of these sources will need to be progressed in consultation with the

local planning authority, Southern Water and the Environment Agency. The proposed development lies within a Source Protection Zone We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency. We recommend the following key consideration is added to Policy DEA008 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
No need for housing	1
Air pollution	1
Highways problems	7
Water capacity	1
Schools capacity	3
Healthcare capacity	1
Lack of local shops/services	1
Habitats impact	5
Tree/landscape impact	10
Climate change	1
Character of area impact	8
Water Supply	2
Agricultural land	1
Flooding	1
Sewerage	4

DEA021

In total 3 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Nicole McArdle		DLP1055
Tamzyn Janes	Southern Water	DLP1567
Carl Thompson	Dunning Dale (Developer)	DLP1633

1 respondents stated that they agreed with the allocation of this site and 1 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required. Easements should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DEA021 Layout is planned to ensure future

access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Highways unable to take addition traffic, access to site issues and potential habitats impacts.

DOV006

No representations were made on this site.

DOV008

In total 3 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
David West	Hobbs Parker	DLP1155
Katie Miller	North Downs Way AONB unit	DLP1477
Tamzyn Janes	Southern Water	DLP1568

1 respondent stated that they agreed with the allocation of this site and no respondents stated that they objected to its allocation.

Specific Issues Raised

- The AONB Unit does not support this allocation. The site lies within the AONB and its rural and vegetated nature means it currently provides an important rural buffer between the built development of Dover to the east and the more open AONB landscape to the west.
- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required. Easements should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV008 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

No general issues were raised

DOV009

No representations were made on this site.

DOV012

In total 10 representations were made on this site by 7 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull	DDC Councillor	DLP135, DLP137
Nathan Burns	Kent and Sussex Natural England	DLP1463
Katie Miller	North Downs Way AONB unit	DLP1478
Tamzyn Janes	Southern Water	DLP1569
Sarah Gleave	Dover and Deal Green Party	DLP2800, DLP2801, DLP3666
Derek Leach	The Dover Society	DLP3004
Julie Davies	CPRE	DLP3706

1 respondent stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England notes that this allocation is for significant site which falls the Kent Downs AONB. The development must be designed to conserve and enhance the character of the Kent Downs AONB. We strongly advise your plan to add a requirement for a masterplan with relevant landscape mitigation to be implemented. Such a master plan should be informed by a detailed LVIA in line with the GLVIA 3rd edition to ensure there are no negative impacts on the AONB. Given the location the master plan should also seek to avoid or mitigate potential impacts on the South Foreland Heritage Coast, ultimately being consistent with the special character and importance of the protected landscape. Given this allocations scale and close proximity to the Folkestone Warren SSSI we advise a requirement to be implemented for an assessment of potential impact pathways for the sites interest features in line with Strategic Policy 16.
- The AONB Unit strongly objects to the allocation of this site. The development does not represent exceptional circumstances, nor would it be in the public interest, given the scale of development and significant harm that would arise to a nationally protected landscape. It is not appropriate to justify the site on the basis of the site having been occupied by Channel Tunnel workers accommodation. While the site was temporarily used for a short period in line with the Channel Tunnel Act 1987, in planning terms it is a greenfield site: it does not meet the definition of previously developed land in the NPPF. Development of a hundred dwellings here would inevitably have a major impact on the character of the landscape and a major visual impact in the valley landscape, including from the B2011, Public Rights of Way, open access land on either side of the valley and other de facto routes of public access, where development would replace the existing open, undeveloped valley side which contributes so much to the character of natural dry chalk valley and appear as a major urbanisation extending out of Dover and up the hillside. The character of the historic farmstead with Great II listed farmhouse

(19th century), whose setting is enhanced by it being surrounded by open, undeveloped land and separated from the existing settled area of Dover would also be adversely impacted.

- Southern have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV012 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Ensure good urban design, quality housing, avoid suburban housing,
- Impact on the character of the area, climate change, habitats, tourism., landscaping/trees, AONB, historical importance, car parking highways and light pollution

DOV017

In total 6 representations were made on this site by 6 consultees. Representations were received from:

Name	Organisation	Comment ID
Jason Ransley	Dover Harbour Board	DLP1221
Nathan Burns	Kent and Sussex Natural England	DLP1456
Tamzyn Janes	Southern Water	DLP1570
Alan Byrne	Historic England	DLP1647
Derek Leach	The Dover Society	DLP3004
Julie Davies	CPRE	DLP3706

1 respondent stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Dover Harbour Board welcomes the inclusion of an appropriate site specific allocation of the Dover Waterfront. We consider that the development potential of this area is understated in the Local Plan allocations.
- Natural England notes that this allocation is for large site which falls within the setting of the Kent Downs AONB. As such the development must be designed to conserve and enhance the character of the Kent Downs AONB. Given the location the proposal should also seek to avoid or mitigate potential impacts on the Dover-Folkestone and the South Foreland Heritage Coasts, ultimately being consistent with the special character and importance of the protected landscape. Given this allocations scale and close proximity to the Folkestone

Warren SSSI we advise a requirement to be implemented for an assessment of potential impact pathways for the sites interest features in line with Strategic Policy 16.

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV017 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Impacts on highways, air quality, noise and vibration and light pollution
- Landscaping and removal of trees impacts

DOV018

In total 6 representations were made on this site by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Sara Gomes	Environment Agency	DLP1552
Tamzyn Janes	Southern Water	DLP1571
Alan Byrne	Historic England	DLP1648
Edward Biggs	DDC Councillor	DLP2004, DLP2005, DLP3664

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Environment Agency - given the known complex flood risk at this site we would not recommend this is included as a housing allocation until it can be demonstrated that development can go ahead safely.
- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV18 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.
- Historic England - a detailed pre-application archaeological assessment should be required in view of the high sensitivity of this location drawing on the recently completed Urban Archaeological Database (this is relevant to all other Dover town centre allocations).

General Issues Raised

- Unspecific comment on the site having major issues and should be removed from the Plan.

DOV019

In total 4 representations were made on this site by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1572
Alan Byrne	Historic England	DLP1649
Pamel Brivio	DDC Councillor	DLP1803
Derek Leach	The Dover Society	DLP3004

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV019 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.
- Historic England this site is immediately adjacent to the Roman Fort of the Classis Britannica Scheduled Monument and will require pre-application archaeological assessment.

General Issues Raised

- Impact on parking

DOV022B

There were no representation made on this site.

DOV022C

In total 2 representations were made on this site by 2 consultees. Representations were received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1573
Derek Leach	The Dover Society	DLP3004

No respondents stated that they agreed with the allocation of this site and No respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water We have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV022C Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Highways impacts

DOV022E

In total 5 representations were made on this site by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Nathan Burns	Kent and Sussex Natural England	DLP1454
Katie Miller	North Downs Way AONB	DLP1479
Dan Blake (DHA Planning)	Peters Properties	DLP1509
Tamzyn Janes	Southern Water	DLP1574
Derek Leach	The Dover Society	DLP3004

1 respondent stated that they agreed with the allocation of this site and no respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England notes that this allocation is for large site which falls immediately outside of the Kent Downs AONB. As such the development must be designed to conserve and enhance the character of the Kent Downs AONB. We advise that your plan should implement a requirement for the delivery of sufficient landscape mitigation to ensure there are no negative impacts on the setting of the AONB. With respect to potential landscape impacts we also strongly advise that advice is sought and followed from the Kent Downs AONB unit on this allocation.
- AONB unit - The western part of this site lies in the AONB and the rest of the site lies in its immediate setting. While we have no objection in principle to residential development here in view of the nature of the site and current use, it is important that the AONB status is acknowledged in the policy. Only a small proportion of the site is occupied by buildings at present and extensive views are available through the site to the attractive steep sided valley side of Whinless Down to the south. A public right of way along this ridge and extensive areas of open access land provide views across to the site. We therefore have some concerns that the density and number of units proposed is inappropriate and may result in an excessively dense development and tall buildings that would potentially have more of a detrimental impact than

currently exists, as well as obscuring the attractive open views from Barwick Road to the AONB landscape beyond.

- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. We recommend the following key consideration is added to Policy DOV022E Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

- Highways impacts

DOV023

In total 1 representation were made on this site by 1 consultees. The representation was received from:

Name	Organisation	Comment ID
Alan Byrne	Historic England	DLP1650

The respondent did not state whether he agreed with the allocation of this site or that he objected to its allocation.

Specific Issues Raised

- A heritage impact assessment will be required for impacts on the setting of the grade II* parish church of St Andrew.

General Issues Raised

No general issues were raised.

DOV025

In total 3 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Nicky Britton-Williams	Kent Wildlife Trust	DLP1522
Tamzyn Janes	Southern Water	DLP1575
Derek Leach	The Dover Society	DLP3004

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Kent Wildlife Trust strongly object to this allocation. This allocation would result in direct loss of Whitfield Down and Buckland Down Local Wildlife Site, being contrary to Dovers Local Plan Policies and the NPPF. Dover Council should ensure that there is no direct loss of local wildlife sites, priority habitats or locally important habitats. Instead, Whitfield Down and Buckland Down Local Wildlife Site should be targeted for restoration and enhancement. This Local Wildlife Site is likely to play an essential role in supporting the reintroduction of the iconic chough to Dover and is therefore of high local importance.
- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV025 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Landscape and tree impacts.

DOV026

No representations were made on this site.

DOV028

In total 5 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1576
Edward Biggs	DDC Councillor	DLP2004, DLP2005, DLP3664
Derek Leach	The Dover Society	DLP3004

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV028 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

- Unspecific comment on the site having major issues and should be removed from the Plan.
- The Dover Society - The Charlton Centre is a valuable community hub and we would object to high density housing unless purpose-built community facilities were included.

DOV030

In total 1 representation was made on this site by 1 consultee. The representation was received from:

Name	Organisation	Comment ID
Tamzyn Janes	Southern Water	DLP1577

The respondent did not state whether they agreed with the allocation of this site or that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy DOV030 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

No general issues were raised.

EAS002

In total 54 representations were made on this site by 53 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Simon Read		DLP1050
Joanna Jones	Eastry Parish Council	DLP1053
Mrs Bridgette Read		DLP1068
Mr Simon Dundas		DLP1131
Samantha Baxter		DLP1137
Tanya Jaynes		DLP1193
Peter Jull	DDC Councillor	DLP138

Mr Mark Burton		DLP1386
J Marsden, A Mollart, S Wells		DLP1627
Mr Alan Byrne	Historic England	DLP1651
Annie Adam		DLP2206
Samir Agrawal		DLP2211
Alex Fletcher		DLP223
William Armstrong		DLP2241
Colin Boughton		DLP2312
David Bradley	Miller and Bradley	DLP2315
Susan Brearley		DLP2320
Philippa Broadfield		DLP2324
Nicholas Bullock		DLP2342
Caroline Cashman		DLP2356
Alex Child-Villiers		DLP2367
Katie Child-Villiers		DLP2368
Belinda Jones		DLP2381
Simon Jones		DLP2386
Penelope Wilson		DLP2401
Frank Landa		DLP2416
Dr Andrew Larner		DLP2422
Peter Cuttell		DLP2459
Alan Hughes		DLP2659
Michael Gear		DLP2723
Lesley Smith		DLP2760
Susan Schofield		DLP2791
David Schofield		DLP2792
Sarah McGonnell		DLP3122
Gary Ransley		DLP3149
Celia Ransley		DLP3151
A Adam		DLP372
Ms Kim Hylott		DLP47
David Robinson		DLP554
Dr Graham Baker	Eastry Park Road Management Ltd	DLP614
David Stewart		DLP623

Mr Jonathan Russell		DLP689, DLP696
Mr Patrick Clarke		DLP702
Graham Castle		DLP793
Mrs Graham Castle		DLP796
Mrs Claire Delahay		DLP88
Dr Geoffrey Gymer		DLP918
Celia Ransley		DLP3151
D Betts		DLP3367
LT James		DLP3422
MRs P Long		DLP3430
Karen Hodgson		DLP3489
Amanda Parsonage		DLP3565
Julie Davies	CPRE	DLP3707

5 respondents stated that they agreed with the allocation of this site and 48 respondents stated that they objected to its allocation.

Specific Issues Raised

- Historic England - the allocation is close to the Grade I listed Fairfield house; the policy should require a heritage impact assessment to identify any measures necessary to avoid or minimise harm to setting of the asset.

General Issues Raised

Issues	Number of responses
No need for housing	6
Impact on Health and Wellbeing	1
Brownfield before greenfield	2
Air quality	2
Lack of Public transport	3
Highways problems	45
Car parking	20
Schools capacity	25
Healthcare capacity	19
Lack of local shops/services	17
General infrastructure deficient	25
General environmental impact	7
Habitats impact	26
Tree/landscape impact	19

Climate change	2
Flooding	24
Character of area impact	30
Agricultural land	9
Impact on heritage	21
Drainage	6

EAS009

In total 27 representations were made on this site by 27 consultees. Representations were received from:

Name	Organisation	Comment ID
Joanna Jones	Eastry Parish Council	DLP1066
Tanya Janes		DLP1193
Dr Graham Baker	Group Scout Leader Eastry Scouts	DLP1370
Mr Mark Burton		DLP1387
David Robinson		DLP1392
Tamzyn Janes	Southern Water	DLP1578
Church Commissioners		DLP1691
Annie Adam		DLP2206
Samir Agrawal		DLP2211
Alex Fletcher		DLP223
Colin Boughton		DLP2311
David Bradley	Partner Miller and Bradley	DLP2315
Susan Brearley		DLP2320
Philippa Broadfield		DLP2324
Nicholas Bullock		DLP2342
Alex Child-Villiers		DLP2367
Kathie Child-Villiers		DLP2368
Frank Landa		DLP2416
Peter Cuttell		DLP2459
Alan Hughes		DLP2659
Lesley Smith		DLP2760
Susan Schofield		DLP2791
David Schofield		DLP2792
Graham Castle		DLP793
Mrs Graham Castle		DLP796
Dr Geoffrey Gymer		DLP918
Karen Hodgson		DLP3489

4 respondents stated that they agreed with the allocation of this site and 21 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy EAS009 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
No need for housing	1
Brownfield before greenfield	2
Lack of Public transport	1
Highways problems	19
Car parking	9
Schools capacity	13
Healthcare capacity	4
Lack of local shops/services	10
General infrastructure	16
General environmental	8
Habitats impact	4
Tree/landscape impact	1
Flooding	7
Character of area	13
Agricultural land	1
Impact on heritage	8

EAS012

In total 50 representations were made on this site by 50 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Simon Read		DLP1064
Joanna Jones	Eastry Parish Council	DLP1065
Mrs Bridgette Read		DLP1074
Mrs Tanya Jaynes		DLP1193
Ms Denise Bottle		DLP1307
David Robinson		DLP1393
Mr Patrick Clarke		DLP1402
Peter Jull	DDC Councillor	DLP141
Tamzyn Janes	Southern Water	DLP1579

Margaret Ackrill		DLP2194
Annie Adam		DLP2206
Samir Agrawal		DLP2211
Mr Alex Fletcher		DLP223
Colin Boughton		DLP2312
David Bradley	Partner Miller and Bradley	DLP2316
Susan Brearley		DLP2320
Philippa Broadfield		DLP2324
Dave Brown		DLP2336
Nicholas Bullock		DLP2342
Caroline Cashman		DLP2356
Alex Child-Villiers		DLP2367
Kathie Child-Villiers		DLP2368
Frank Landa		DLP2416
Mr Lee Gammon		DLP2458
Peter Cuttell		DLP2459
Lesley Marsh		DLP2485
William Walker		DLP2579
Susan Walker		DLP2580
Alan Hughes		DLP2659
Lesley Smith		DLP2760
Susan Schofield		DLP2791
David Schofield		DLP2792
Sandra Palmer		DLP3190
J E Robinson		DLP3352
Mr Simon Dundas		DLP537
Mr David Stewart		DLP623
Ms Eloise Thompson		DLP712
Mrs Sharon Irvine		DLP759
Mr Steve Patfield		DLP767
Mr Mark Burton		DLP782
Mr GRAHAM CASTLE		DLP793
Mrs GRAHAM CASTLE		DLP796
Dr Geoffrey Gymer		DLP918
Mrs Dawn Hawkes		DLP985
J E Robinson		DLP3352

Dr J. S. B Jackson		DLP3421
Karen Hodgson		DLP3489
Yvonne Thomas		DLP3558
Victoria Culshaw		DLP3559
Arthur Stevenson		DLP3581
Julie Davies	CPRE	DLP3707

3 respondents stated that they agreed with the allocation of this site and 46 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. The proposed development lies within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency's Groundwater Protection Policy. We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency. We recommend the following key consideration is added to Policy EAS012 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

Issues	Number of responses
No need for housing	12
Affordable housing	3
Brownfield before greenfield	3
Air quality	2
Lack of Public transport	3
Highways problems	41
Car parking	9
Schools	16
Healthcare	13
Local shops/services	11
General infrastructure	28
General environmental	4
Habitats impact	16
Tree/landscape impact	8
Flooding	15
Character of area	25
Agricultural land	8
Impact on heritage	14

Sewerage	1
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EYT001

In total 44 representations were made on this site by 43 consultees. Representations were received from:

Name	Organisation	Comment ID
Miss Samantha Long		DLP1024
Miss Tanya Clark		DLP1220
Alastair Clark		DLP1237, DLP1262
Mr George Addis		DLP1367
Miss Samantha Long		DLP1415
Peter Jull	DDC Councillor	DLP143
Martin Hart	Managing Director Pentland Homes	DLP1503
Caroline Vincent	Clerk Eythorne Parish Council	DLP1838
Cllr Edward Biggs	DDC Councillor	DLP1971
Cllr Linda Keen	DDC Councillor	DLP2013
Cllr Peter Walker	DDC Councillor	DLP2036
Mr Neil Fielder		DLP221
Bridget Brown		DLP2335
D.J Brown		DLP2337
Richard Clements		DLP2408
Annette Whitehead		DLP2541
Malcolm Whitehead		DLP2542
Dave White		DLP2543
Sheena Toole		DLP2599
Mrs Abigail Simmons		DLP2774
Dr Caroline Greville		DLP2873
Marjorie Ovenden		DLP3193
David Nash		DLP3221
Linda Nash		DLP3224
Jennifer Wolfenden		DLP3279
Jeffrey Whitehead		DLP3285
Andiee Bent		DLP3286
Mrs E North		DLP444
Caroline Clements		DLP464
Mark James		DLP676
Miss Lesley Steward		DLP809
Mr Kevin Aubrey		DLP821
Mr Robert NORTH		DLP9
Mrs Collard		DLP3381
Linda Player		DLP3453
Mrs Patricia Smith		DLP3655
A J Barker		DLP3673

Janet Holness		DLP3676
Virginia Skinner		DLP3680
Steve Skinner		DLP3681
Finley Skinner		DLP3682
Mrs Sandra Wright		DLP3684
Mr John Brown		DLP3685

2 respondents stated that they agreed with the allocation of this site and 34 respondents stated that they objected to its allocation.

Specific Issues Raised

- No specific issues were raised

General Issues Raised

Issues	Number of responses
No need for housing	1
Brownfield before greenfield	2
Air quality	1
Lack of Public transport	16
Highways problems	38
Car parking	5
Schools capacity	17
Healthcare capacity	14
Lack of local shops/services	24
General infrastructure	10
Habitats impact	20
Tree/landscape impact	22
Flooding	22
Character of area	30
Agricultural land	16
Impact on heritage	3
Drainage	10
Water supply	3

EYT008

In total 40 representations were made on this site by 37 consultees. Representations were received from:

Name	Organisation	Comment ID
Richard Ledger	Finns (June House)	DLP1016
Benjamin Timson		DLP1100
Miss Tanya Clark		DLP1211
Mr George Addis		DLP1365
Caroline Vincent	Clerk Eythorne Parish Council	DLP1842

Edward Biggs	DDC Councillor	DLP1971
Linda Keen	DDC Councillor	DLP2013
Miss Chrissy Grimsdale		DLP235
Richard Clements		DLP2407
Sophie Grimsdale		DLP241
Miss Tayla Barry		DLP243
Janet Holness		DLP2494
Annette Whitehead		DLP2541
Malcolm Whitehead		DLP2542
Dave White		DLP2543
Mr Luke Whitehouse		DLP276
Jay Pasaila		DLP3165
David Nash		DLP3221
Linda Nash		DLP3224
Steven Harding		DLP326
Jennifer Wolfenden		DLP3279
Mrs S Howe		DLP334
Mr John Brown		DLP603
Mr Josh Walton		DLP699
Miss Tayla Barry		DLP703
Miss Lesley Steward		DLP813
Mr Kevein Aubrey		DLP819
Miss Zoe Pennington		DLP900
AJ Barker		DLP3673
Richard Clements		DLP3674
Janet Holness		DLP3676
Virginia Skinner		DLP3680
Steve Skinner		DLP3681
Finlay Skinner		DLP3682
Mrs Sandra Wright		DLP3684
Mr John Brown		DLP3685
Miss Lesley Steward		DLP3688
Mr Kevin Aubrey		DLP3718
Mrs Patricia Smith		DLP3655

1 respondents stated that they agreed with the allocation of this site and 31 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy issues were raised

General Issues Raised

Issues	Number of responses
Too much housing	1

Air quality	2
Brownfield before Greenfield	1
Lack of Public transport	12
Highways problems	32
Car parking	8
Schools capacity	27
Healthcare capacity	13
Lack of local shops/services	18
General infrastructure	10
Habitats impact	14
Tree/landscape impact	19
Climate change	1
Flooding	16
Character of area	16
Agricultural land	5
Impact on heritage	2
Drainage/Sewerage	8
Water supply	5
Light pollution	2

EYT019

In total 40 representations were made on this site by 39 consultees. Representations were received from:

Name	Organisation	Comment ID
Miss Samantha Long		DLP1029
Mrs Micheline Shether		DLP1040
Benjamin Timson		DLP1104
Miss Tanya Clark		DLP1186
Mr George Addis		DLP1366
Miss Samantha Long		DLP1417
Tamzyn Janes	Southern Water	DLP1580
Caroline Vincent	Clerk Eythorne Parish Council	DLP1841
Edward Biggs	DDC Councillor	DLP1971
Linda Keen	DDC Councillor	DLP2013
Miss Chrissy Grimsdale		DLP236
Joseph Clayton		DLP2389
Richard Clements		DLP2407
Sophie Grimsdale		DLP242
Janet Holness		DLP2494
Mrs Annette Whitehead		DLP2541

Malcolm Whitehead	DLP2542
Dave White	DLP2543
Mr Luke Whitehouse	DLP277
Carlie Wilcock	DLP2886
Jay Pasaila	DLP3165
David Nash	DLP3221
Linda Nash	DLP3224
Steven Harding	DLP326
Jennifer Wolfenden	DLP3279
Mr John Brown	DLP602
Miss Lesley Steward	DLP813
Mr Kevin Aubrey	DLP819
Miss Zoe Pennington	DLP904
Richard Clements	DLP3674
Janet Holness	DLP3676
Virginia Skinner	DLP3680
Steve Skinner	DLP3681
Finlay Skinner	DLP3682
Mrs Sandra Wright	DLP3684
Mr John Brown	DLP3685
Miss Lesley Steward	DLP3688
Mr Kevin Aubrey	DLP3718
Mrs Patricia Smith	DLP3655

No respondents stated that they agreed with the allocation of this site and 33 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy EYT019 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

General Issues Raised

Issues	Number of responses
Too much housing	3
Air quality	3
Lack of Public transport	11

Highways problems	33
Car parking	2
Schools capacity	25
Healthcare capacity	17
Lack of local shops/services	19
General infrastructure	8
Habitats impact	12
Tree/landscape impact	14
Climate change	1
Flooding	5
Character of area	15
Agricultural land	5
Sewerage	5
Water supply	4
Light pollution	1

GOO006

In total 17 representations were made on this site by 17 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Louise Allen		DLP1222
Ms J Gordon		DLP1228
Julian Fitzwalter	Goodnestone Estate	DLP1275
Mrs Sue Ward	British Horse Society	DLP1318
Mark Richardson		DLP1332
Joanna Bird		DLP1358
Tamzyn Janes	Southern Water	DLP1581
Michael Tarring		DLP2612
Lesley Hill		DLP393
Andrew Beeching		DLP441
Miss Nicola Clear		DLP458
Mr Richard Himsworth		DLP486
Mr Kenny Ingram		DLP535
Mrs Sue Baker		DLP594
Kevin Phillips	Goodnestone PC	DLP598
Mr Stephen Fennemore		DLP977
Paul Allen		DLP993

1 respondents stated that they agreed with the allocation of this site and 15 respondents stated that they objected to its allocation.

Specific Issues Raised

- GOO006 would badly affect access to bridleway EE275 and the link to bridleway EE279. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map. As a result I have included a number of footpaths which are the subject of active consideration for upgrade or have the potential to be upgraded before the cut off deadline of 2026. Consideration should be given to how to retain and enhance the PROWs affected by building in accordance with the NPPF.
- Southern Water - have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. The proposed development lies within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency Groundwater Protection Policy. We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency. We recommend the following key consideration is added to Policy GOO006 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Too much housing	4
Affordable housing	1
Brownfield before greenfield	2
Air quality	3
Lack of Public transport	6
Highways problems	12
Schools capacity	1
Healthcare capacity	2
Lack of local shops/services	8
General infrastructure	2
General environmental	3
Habitats impact	6
Tree/landscape impact	9
Climate change	4
Flooding	7
Character of area	6
Agricultural land	5
Impact on heritage	10
Sewerage	3
Water supply	1

GTM003

In total 3 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull	DDC Councillor	DLP144
Tamzyn Janes	Southern Water	DLP1582
Mr William Hickson	Savills (Hannah Haddad)	DLP1618

A further representation was made on this site under the Evidence Base:

The Landscape Appraisal states that as a greenfield site, any development would result in an inherent loss of rural landscape resource (as would be the case for other greenfield development). However, as the site lies outside of any landscape designation, it is likely that the larger proposal can be accommodated within a sensitive scheme. In addition, the Landscape Appraisal states that whilst the remainder of the site is considered 'unsuitable', given the high-level nature of the HELAA appraisal, there is scope for different assessment rankings to be concluded (DLP3569)

1 respondents stated that they agreed with the allocation of this site and 1 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - the proposed development lies within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency's Groundwater Protection Policy. We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency.

General Issues Raised

- This site is not deliverable in the form proposed. It would landlock the rest of the promoter's land submitted at the call for sites stage.
- The whole site could come forward under the currently drafted windfall policy.
- The internal adopted road network should extend to the boundary of GMO005 without a ransom strip to provide the public benefit of reducing traffic impact on Pixwell Lane and Cherry Lane.

GUS002

In total 6 representations were made on this site by 6 consultees. Representations were received from:

Name	Organisation	Comment ID
Nathan Burns	Kent and Sussex Natural England	DLP1453
Tamzyn Janes	Southern Water	DLP1583

Mr Alan Byrne	Historic England	DLP1652
The Land Trust	Lee Evans (Ben Young)	DLP1875
Peter Jull	DDC Councillor	DLP195
Derek Leach	The Dover Society	DLP3005

1 respondents stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England notes that this allocation is for large site which falls within the immediate setting of the Kent Downs AONB. As such the development must be designed to conserve and enhance the character of the Kent Downs AONB. We strongly advise your plan to add a requirement for a masterplan with relevant landscape mitigation to be implemented. Such a master plan should be informed by a detailed LVIA in line with the GLVIA 3rd edition to ensure there are no negative impacts on the AONB. Given the location the master plan should also seek to avoid or mitigate potential impacts on the South Foreland Heritage Coast, ultimately being consistent with the special character and importance of the protected landscape. Given this allocations scale and close proximity to Kingsdown Cliffs SAC and Site of SSSI we strongly advise a requirement to be implemented for a project level HRA. This HRA should chiefly consider the potential impact pathway of significantly increased recreational disturbance and the relevant avoidance or mitigation measures required in line with Strategic Policy 16.
- Southern Water - we have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy GUS002 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.
- Historic England - the site is within the setting of Dover Castle (multiple designations) and Fort Burgoyne (Scheduled Monument) and requires sensitive handling; Historic England is pleased to be involved in ongoing discussions with interested parties.
- The Land Trust - concern with the apparent down-grading of the Former Connaught Barracks site from a Strategic to a Non-Strategic Housing Allocation. There is no longer any strategic policy objective to deliver the future of the Fort, a Scheduled Monument of national historic interest that is included on the Historic England at risk register. The Regulation 18 Draft Local Plan Interactive Policies Map the entirety of the land now controlled by the Land Trust are still shown as falling within the site allocation, when it does not form part of the Connaught Barracks planning application and is not controlled by Homes England. These elements include a Local Wildlife Site, Recreation Ground and the Fort Burgoyne Scheduled Monument, for which the Land Trust as owner is seeking to develop plans which holistically

manages and develops the 42 hectares in its ownership to maximise community and business benefit for residents of the new Connaught Barracks residential development, Burgoyne Heights and Dover town residents, as well as for visitors outside of the immediate area. The Draft Local Plan needs to provide clarification as to how the regeneration of these two separate elements, Connaught Barracks & Fort Burgoyne will be delivered.

General Issues Raised

- As a brownfield site a higher number of houses should be achievable.
- Layout and design of this site should involve the closure of or restriction of traffic on Dover Road.
- The Dover Society - From the extremely poor map it seems to show the extent of the development site is Connaught Hill and includes Connaught Park as part of the development site. If this is the case we would strongly object to this site development proposal.

KIN002

In total 138 representations were made on this site by 135 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Daniel Couzens		33
Dr Phil Peach		69
Ms Isabelle Gosse		70
Mr George Gosse		71
Miss Maddie Gosse		76
Miss Emily Hoskins		77
Mrs Angela Shrimpton		79
Brian Moleshead		92
Ronald Broadley		182
Mr Peter Cartwright		187
Peter Jull	DDC Councillor	202
Mr Justin Ramsay		320
Don Hough		321
Mrs Carol Harvey		374
Mrs Carola de Settle		385
Mr Mark Thursten		425
Joanne Gosse		438
Dr Sharon Danby		487
Mrs Monica Hough		492
Dr Richard Clemence		605
Mrs Gillian Hogbin		701
Ms Karen Brewer		799
Mrs J Mallion		838
Mr Richard Mallion		923
Elizabeth Deschamps		991
Mr Timothy Stone		1115

Martin Stone		1251
Mrs Sue Ward	British Horse Society	1324
Mr Andrew Lawrence		1351
Judith Clarke		1405
Sara Sweeney	Senior Planning and Development Manager Kitewood	1410
Mr Nathan Burns	Kent and Sussex Natural England	1464
Katie Miller	Kent Downs AONB	1481
Tamzyn Janes	Southern Water	1584
Duanne Poppe	Ringwould with Kingsdown Parish Council	1831
Mike Eddy	Walmer Parish Council	1995
Elizabeth Zdziebko		2202
Joanna Woolley		2213
Isobel Wiseman		2227
Jade Andrews		2230
Caroline Anglim		2235
Tony and Valerie Armitage		2238
Jerran Bailey		2251
Anne Ballinger		2255
Paul Barrett		2264
David and Susan Batchelor		2268
Mrs Rosalind Beresford		2271
Mrs Amanda Blacker-Buhler		2298
Rosie Bolton		2299
Mr Colin Broughton		2330
Vanessa Broughton		2333
Caroline Cannons		2346
Paul Cannons		2348
Barbara Carmichael		2349
Geoffrey Lewis Case		2354
Sue Chapman		2363
Fiona Clark		2376
Jill Cliff		2412
Vanessa Clift		2415
Cllr Helen Williams	DDC Councillor	2420
Sally Colligan		2430
Annette Davies		2463
Mariya Deschamps		2472
Samantha Greenhalgh		2477
Mark Deschamps		2479
Mr Phillip Deschamps		2483

Ann-Marie Dewhurst		2491
Mark Dewhurst		2493
Sylvia Main		2496
Michael Downing		2504
Roger Driver		2508
Mauro Feltrin		2535
Peter Finch		2538
Louise Fish		2539
Nick Fish		2540
Susan Watson		2553
Sonja Watsham	East Kent Climate Action	2570
Sandra Upton		2589
Mrs Daryl Leddy		2617
Guy Maginn		2619
Lisa Holden		2630
Abigail Francis		2653
Martin Frawley		2655
Mrs Susan Sullivan		2658
Jolene Frawley-Bailey		2692
Jonathan Stone		2716
Martin Garside		2720
Alan & Sarah Gleave		2726
Catherine Stone		2745
Angela Stone		2747
Antony Shepherd		2783
John Sharvill		2785
Ms Sarah Gleave	Dover and Deal Green Party	2800
Ms Sarah Gleave	Dover and Deal Green Party	2802
noelle graal		2867
Balj Bhinder		2868
Brenda Gray		2870
Mr Paul Groves		2882
Alice Hogben		2909
Robert Hogben		2910
Mrs Diane Marie Rose		2952
Adrian Rose		2954
Charlotte Jones		2960
Sue Lamoon		2965
Clive Chandler		2970
Simon Longland		3073
Georgina Maude		3116
Melanie McGrath		3124
Paul Mckenna		3126
Maureen Redgewell		3144
Danny Redgewell		3145
Mr Justin Ramsay		3153

Mrs Lee Pickup		3175
Kelvin Pawsey		3185
Andrew Noble		3207
Cynthia Mercer		3227
Ian and Marion Miller		3231
Deborah Moggach		3235
Elaine Mordaunt		3242
Robin Mulhern		3263
Suzanne Mulvaney		3266
Elizabeth Williams		3283
P Moore		3440
Mr & Mrs Pressnell		3457
J Proctor		3459
Kim Horwood		3470
Gordon and Elaine Love		3502
Jasmine Symes		3515
Susan and Anthony Relf		3530
Elaine Cartledge		3544
Neil Fearn		3545
Valerie Trewartha		3550
Martin Wyman		3551
Kathryn Hewitt		3553
Jo Radcliffe		3562
Lesley & David Dobby		3563
John Powell		3574
Ms Sarah Gleave	Dover and Deal Green Party	3667

1 respondent stated that they agreed with the allocation of this site and 133 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - KIN002 would have adverse impact on bridleways ER20/21 which link to many others in this area popular with equestrians. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map.
- Natural England - the development must be designed to conserve and enhance the character of the Kent Downs AONB. The HELAA identifies that development at this site would have a landscape impact and that further assessment is required to demonstrate whether this can be mitigated. We strongly advise your plan to add a requirement for a masterplan with relevant landscape mitigation to be implemented. Such a master plan should be informed by a detailed LVIA in line with the GLVIA 3rd edition to ensure there are no negative impacts on the AONB. Given the location the master plan should also seek to avoid or mitigate potential impacts on the South Foreland Heritage Coast. Given this allocations scale and close proximity to the Dover to Kingsdown Cliffs SAC and Site of SSSI we recommend a requirement be

implemented for a project level HRA and should consider the potential impact pathway of significantly increased recreational disturbance and the relevant avoidance or mitigation measures required in line with Strategic Policy 16.

- Kent Downs AONB unit - Concerns about the potential impact on the setting of the AONB given its proximity and intervisibility. Sensitivity of the site is increased by its high topography and the fact it shares similar landscape characteristics to the adjacent AONB. We therefore do not support this allocation. Should it be retained, policy to mitigation should include extending the existing woodland to the south of the site northwards, along the western boundary, and a requirement for the design, form, materials and heights of buildings to be sensitive to the sites location and views from the AONB.
- Southern Water - we have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy, Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Too much housing	10
Affordable housing	8
Brownfield before greenfield	14
Air quality	10
Lack of Public transport	30
Highways problems	111
Car parking	10
Schools capacity	47
Healthcare capacity	33
Lack of local shops/services	31
General infrastructure	34
General environmental	16
Habitats impact	19
Tree/landscape impact	49
Climate change	8
Flooding	3
Character of area	52
Agricultural land	20
Impact on heritage	7
Sewerage/Drainage	11
Water supply	6
Light pollution	7
AONB impact	39
Tourism effects	8
Employment	17

LAN003

In total 24 representations were made on this site by 24 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Sophie Arkinstall-Doyle		156
Peter Jull	DDC Councillor	212
Peter Ashenhurst		304
Mr Michael Arkinstall-Doyle		313
Mr Ian Goldstraw		766
Miss Hazel Foster		987
Mr Thomas Hunter		1047
Mrs Kayleigh Hunter		1052
Mrs Jo Devanny		1073
Mr Al Finch		1077
Mr Eddie Beak		1078
Laura Smith		1158
Chris Shaw		1212
Seb Willett	Langdon Parish Council	1243
Mrs Sue Ward	British Horse Society	1319
Chris Shaw		1337
Tamzyn Janes	Southern Water	1585
Gillian Kirby		2371
Paula Goldstraw		2447
Owner LAN003		2498
Gary Gallagher		2701
Anthony Hyde		2945
miss Charlotte Farley		3480
Emily Smith		3538

4 respondents stated that they agreed with the allocation of this site and 19 respondents stated that they objected to its allocation.

Specific Issues Raised

- The British Horse Society - LAN003 may adversely affect footpath ER44 because of the increase in traffic generated by the development. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map.
- Southern Water - have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Limited capacity is not a constraint to development provided

that planning policy and subsequent conditions ensure that occupation of the development is phased to align with the delivery of new wastewater infrastructure. Recommend the following key consideration is added to Policy LAN003 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

Issues	Number of responses
Too much housing	1
Affordable housing	4
Brownfield before greenfield	
Air quality	1
Lack of Public transport	2
Highways problems	19
Car parking	3
Schools capacity	4
Healthcare capacity	1
Lack of local shops/services	6
General infrastructure	2
General environmental	
Habitats impact	11
Tree/landscape impact	12
Climate change	
Flooding	
Character of area	11
Agricultural land	4
Impact on heritage	3
Sewerage/Drainage	1
Water supply	
Noise	5
AONB impact	
Tourism effects	
Employment	

LYD003

In total 16 representations were made on this site by 15 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Steve Bateman		941
Ian McAthy		1162
Katie Miller	Kent Downs AONB	1480
Tamzyn Janes	Southern Water	1586

Quinn Estates		2076
Sarah Baker		2252
Mrs Casey		2355
Nina Dougall		2503
Stuart Taylor		2609
Lyn-Marie Taylor		2611
Ms Sarah Gleave	Dover and Deal Green Party	2800
Ms Sarah Gleave	Dover and Deal Green Party	2803
Anita Hoskins		2929
Derek Leach	The Dover Society	3006
Joanne Mckeown		3128
Ms Sarah Gleave	Dover and Deal Green Party	3668

1 respondents stated that they agreed with the allocation of this site and 13 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific issues were raised

General Issues Raised

Issues	Number of responses
Too much housing	1
Affordable housing	
Brownfield before greenfield	1
Air quality	
Lack of Public transport	
Highways problems	8
Car parking	1
Schools capacity	1
Healthcare capacity	1
Lack of local shops/services	5
General infrastructure	2
General environmental	
Habitats impact	1
Tree/landscape impact	5
Climate change	
Flooding	8
Character of area	2
Agricultural land	
Impact on heritage	2
Sewerage/Drainage	3
Water supply	
Noise	
AONB impact	1

Tourism effects	
Employment	

NON006

In total 11 representations were made on this site by 10 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mrs Claire Jeffery		1090
Roma Capital Group c/o Agent	Developer	1160
Mrs Jean Ross		1397
Mrs Jean Ross		1399
Tamzyn Janes	Southern Water	1587
Mr Alan Byrne	Historic England	1653
Cllr Edward Biggs	DDC Councillor	1968
Cllr Linda Keen	DDC Councillor	2011
Jane Vurley		2586
mrs lyn Heard		3525
Mr R Hopper		3533

1 respondent stated that they agreed with the allocation of this site and 5 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 35 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water's underground infrastructure crosses this site. Easements would be required, and should be clear of all proposed buildings and substantial tree planting.
- The proposed development lies within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency's Groundwater Protection Policy. We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency.
- Southern Water recommend the following key consideration is added to Policy NON006 Occupation of development will be phased to align with the delivery

of sewerage infrastructure, in liaison with the service provider. Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

- Historic England - the site is in the setting of a number of grade II Listed Buildings and despite being a redevelopment of an existing site a heritage impact assessment should be required; this may help to reveal significance by enhancing the setting of the heritage assets.

General Issues Raised

Issues	Number of responses
Affordable housing	1
Brownfield before greenfield	1
Air quality	1
Highways problems	6
General infrastructure	2
Habitats impact	1
Tree/landscape impact	1
Character of area	1
Impact on heritage	3
Sewerage/Drainage	1
Water supply	2
Noise	1
Employment	1

NOR005

In total 11 representations were made on this site by 9 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mrs Sue Ward	British Horse Society	1320
Mr Nathan Burns	Kent and Sussex Natural England	1455
Tamzyn Janes	Southern Water	1588
Mr Alan Byrne	Historic England	1654
Alex Kalorkoti	Quinn Estates Ltd	2057
Peter Cutler	Friends of Betteshanger	2085
Mrs Susan Sullivan		2665
Ms Sarah Gleave	Dover and Deal Green Party	2800
Ms Sarah Gleave	Dover and Deal Green Party	2804
Shelley Morris		3250
Ms Sarah Gleave	Dover and Deal Green Party	3669
Julie Davies	CPRE	3708

1 respondent stated that they agreed with the allocation of this site and 7 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - NOR005 could badly affect footpath EE367 and probably also affect footpaths EE368 and EE369. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map.
- Natural England - Given this allocations scale and close proximity to the Thanet Coast and Sandwich Bay SPA and Ramsar site and the Sandwich Bay to Hacklinge Marshes SSSI we advise a requirement to be implemented for a project level HRA for future applications. This HRA should chiefly consider the potential impacts pathways of increased recreational disturbance, direct habitat losses, loss of functionally linked habitat, changes in air quality and increased contaminated surface water run-off.
- Southern Water - have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 210 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development.
- Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. Southern Water recommend the following key consideration is added to Policy NOR005 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout is planned to ensure future access to existing water infrastructure for maintenance and upsizing purpose.
- Historic England - the site is in the setting of the Grade II* Registered Park and Garden of Northbourne Court so should require a heritage impact assessment and measures within an application to avoid or minimise harm to the setting of the heritage asset.

General Issues Raised

Issues	Number of responses
Highways problems	2
Habitats impact	6
Tree/landscape impact	2
Climate change	4
Flooding	1

Character of area	1
Impact on heritage	1

PRE003

In total 21 representations were made on this site by 21 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mrs Jane Tong		12
Mrs Philippa Standen		72
Rhona Clover		115
Mr Mark Sankey		118
Mr Mark Squillaci		128
Mrs Fiona Squillaci		131
MR Graham Bagshaw		140
Mrs Emma Gower		162
Mr Daniel Gower		163
Peter Jull	DDC Councillor	226
Dr Lex Mauger		300
Dr Lex Mauger		301
Keith Bouncer		771
Dr Martin Ferber		921
Mrs Reanna Bowman		927
Miss Stacey White		1044
Mr matthew bowman		1058
Jean Swan	Preston PC	1847
Brian Short		2779
Gail Short		2780
Nick French		3482

1 respondent stated that they agreed with the allocation of this site and 19 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy issues were raised

General Issues Raised

Issues	Number of responses
Too much housing	3
Affordable housing	2
No need for affordable housing	7
Lack of Public transport	6
Highways problems	15
Car parking	7
Healthcare capacity	2

Lack of local shops/services	6
General infrastructure	5
Habitats impact	11
Tree/landscape impact	4
Character of area	7
Agricultural land	4
Impact on heritage	1
Sewerage/Drainage	14
Noise	2
Employment	3

PRE016

In total 18 representations were made on this site by 18 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mrs Philippa Standen		72
Rhona Clover		115
Mr Mark Sankey		117
Mr Mark Squillaci		126
Mrs Fiona Squillaci		129
Peter Jull	DDC Councillor	226
Dr Lex Mauger		301
Keith Bouncer		771
Dr Martin Ferber		921
Mrs Reanna Bowman		926
Mr matthew bowman		1059
Miss Stacey White		1079
Tamzyn Janes	Southern Water	1589
Jean Swan	Preston PC	1847
Quinn Estates	Developer	2075
Brian Short		2779
Gail Short		2780
Nick French		3482

2 respondents stated that they agreed with the allocation of this site and 14 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 35 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide

additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Southern Water recommend the following key consideration is added to Policy PRE016 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

Issues	Number of responses
Too much housing	3
Affordable housing	2
No need for affordable housing	7
Lack of Public transport	8
Highways problems	9
Car parking	1
Schools capacity	7
Healthcare capacity	4
Lack of local shops/services	4
General infrastructure	6
General environmental	3
Habitats impact	7
Tree/landscape impact	8
Flooding	2
Character of area	3
Agricultural land	7
Impact on heritage	1
Sewerage/Drainage	11
Noise	2
Employment	3

PRE017

In total 30 representations were made on this site by 28 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mrs Philippa Standen		72
Dr Lex Mauger		93
Rhona Clover		112
Mr Mark Sankey		114
Rhona Clover		115
Mr Jason Morris		124
Mr Mark Squillaci		127
Mrs Fiona Squillaci		130

MR Graham Bagshaw		139
Mr Brian Covey		155
Mrs Emma Gower		158
Mr Daniel Gower		159
Robert Milnes		193
Peter Jull	DDC Councillor	226
Mr James Bensted		282
Dr Lex Mauger		301
MISS Heather Mcclean		419
mrs Tracy Ballard		420
Keith Bouncer		771
Dr Martin Ferber		921
Mrs Reanna Bowman		925
Roger Ayling		995
Miss Stacey White		1043
Mr matthew bowman		1061
Tamzyn Janes	Southern Water	1590
Jean Swan	Clerk Preston Parish Council	1847
Jean Swan	Clerk Preston Parish Council	1848
Brian Short		2779
Gail Short		2780
Nick French		3482

2 respondents stated that they agreed with the allocation of this site and 25 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - we have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 75 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Southern Water recommend the following key consideration is added to Policy PRE017 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

Issues	Number of responses
Too much housing	2
Affordable housing	2

No need for affordable housing	1
Lack of Public transport	10
Highways problems	19
Car parking	1
Schools capacity	9
Healthcare capacity	6
Lack of local shops/services	10
General infrastructure	7
Habitats impact	12
Tree/landscape impact	5
Flooding	1
Character of area	3
Agricultural land	10
Impact on heritage	2
Sewerage/Drainage	12
Noise	2

RIN004

In total 29 representations were made on this site by 22 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Robert Botwright		179
Mr Robert Botwright		217
Peter Jull	DDC Councillor	229
Maurice Webb		289
Mrs Dorothy Webb		306
Messrs Bomer		513
Mrs Sue Ward	British Horse Society	1323
Katie Miller	Kent Downs AONB unit	1482
Tamzyn Janes	Southern Water	1591
Duanne Poppe	DDC Councillor	1832
Mr Robert Botwright		2309
Mr Robert Botwright		2310
Cllr Helen Williams	DDC Councillor	2421
Maurice Webb		2545
Maurice Webb		2546
Geraldine Webb		2549
Kathleen Walsh		2578
Alan & Sarah Gleave		2728
Ms Sarah Gleave	Dover and Deal Green Party	2800
Ms Sarah Gleave	Dover and Deal Green Party	2805
M Huggins		2943

P J Huggins		2944
Mr Justin Ramsay		3154
Nicholas Quested		3161
Wayne Pointon		3168
Steve Morrison		3244
Kim Horwood		3471
Ms Sarah Gleave	Dover and Deal Green Party	3670
Julie Davies	CPRE	3709

3 respondents stated that they agreed with the allocation of this site and 21 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - any large scale development in this area would affect restricted byway ER17A and ER18A and bridleway ER16. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map.
- Kent Down AONB unit - Support the requirement for existing trees and hedgerows to be retained and enhanced.
- Southern Water - have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required, and should be clear of all proposed buildings and substantial tree planting. Southern Water recommend the following key consideration is added to Policy RIN004 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Not brownfield land	7
Dark skys	7
Lack of Public transport	2
Highways problems	13
Schools capacity	1
Lack of local shops/services	4
General infrastructure	1
General environmental	1
Habitats impact	8
Tree/landscape impact	8
Climate change	3
Flooding	1
Character of area	9
Agricultural land	6

AONB impact	16
Employment	1

SAN006

In total 9 representations were made on this site by 8 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Tamzyn Janes	Southern Water	1592
Katie Cullen	Cycling Transport Planner Kent County Council	1628
Mr Alan Byrne	Historic England	1655
Miss Laura Fidler	Sandwich Town Council	1816
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
Mr Terence Hopper		2917
Janet Holness		3677

1 respondent stated that they agreed with the allocation of this site and 5 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 32 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Southern Water recommend the following key consideration is added to Policy SAN006 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
- Historic England - site is adjacent the Sandwich Town Walls Scheduled Monument and requires careful assessment of potential impacts in the design and morphology of proposed development in relation to the asset.

General Issues Raised

Issues	Number of responses
Highways problems	4
Coach parking	2
Schools capacity	4

Healthcare capacity	4
Lack of local shops/services	3
General infrastructure	3
Habitats impact	2
Tree/landscape impact	4
Flooding	3
Character of area	2
Impact on heritage	3
Sewerage/Drainage	1
Water supply	1

SAN007

In total 11 representations were made on this site by 10 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Tamzyn Janes	Southern Water	1593
Mr Alan Byrne	Historic England	1656
Miss Laura Fidler	Sandwich Town Council	1822
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
Mr Terence Hopper		2918
Cllr Paul Carter	Sandwich Town Council	3302
Derek Parker		3451
Janet Holness		3677
Julie Davies	CPRE	3710

1 respondent stated that they agreed with the allocation of this site and 6 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 80 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Assessment has also revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting.

Southern Water recommend the following key consideration is added to Policy SAN007 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider. Layout is planned to ensure future access to existing water and wastewater infrastructure for maintenance and upsizing purpose.

- Historic England - the site is within the setting of numerous Grade II Listed Buildings which comprise the former St Bartholomews Hospital; a heritage impact assessment is required.

General Issues Raised

Issues	Number of responses
Highways problems	5
Police Station	1
Schools capacity	4
Healthcare capacity	4
Lack of local shops/services	1
General infrastructure	5
General environmental	1
Habitats impact	3
Flooding	2
Character of area	1
Impact on heritage	6
Employment	1

SAN008

In total 13 representations were made on this site by 10 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
JOHN ELVIDGE	John Elvidge Planning Consultancy	490
JOHN ELVIDGE	John Elvidge Planning Consultancy	1144
Tamzyn Janes	Southern Water	1594
Miss Laura Fidler	Sandwich TC	1823
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
Mr Terence Hopper		2919
Mr Terence Hopper		2921
Cllr Paul Carter	Sandwich TC	3304
Derek Parker		3451
Janet Holness		3677
Julie Davies	CPRE	3710

2 respondents stated that they agreed with the allocation of this site and 8 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 35 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers, and Southern Water will need to work with site promoters to understand the development program and to review whether the delivery of network reinforcement aligns with the occupation of the development. Southern Water recommend the following is added to Policy SAN008 Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.
- Southern water - Assessment has also revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. Southern Water recommend the following is added to Policy SAN008. Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

General Issues Raised

Issues	Number of responses
Affordable housing	2
Lack of Public transport	2
Highways problems	6
Police Station	1
Schools capacity	4
Healthcare capacity	4
Lack of local shops/services	1
General infrastructure	3
General environmental	2
Habitats impact	2
Tree/landscape impact	4
Flooding	7
Character of area	1
Sewerage/Drainage	2
Employment	1

SAN013

In total 13 representations were made on this site by 11 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Tristan Reid-Croucher		48
Mr Lewis Watkinson		426
Mr I Black		439
Mr I Black		442
Mr John Bean		856
Miss Laura Fidler	Sandwich TC	1824
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
Mr Terence Hopper		2923
Cllr Paul Carter	Sandwich TC	3305
Derek Parker		3451
Janet Holness		3677

1 respondent stated that they agreed with the allocation of this site and 11 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific issues were raised.

General Issues Raised

Issues	Number of responses
Too much housing	3
Brownfield land first	1
Affordable housing	1
Lack of Public transport	1
Highways problems	10
Police Station	1
Schools capacity	2
Healthcare capacity	4
General infrastructure	6
Habitats impact	4
Tree/landscape impact	9
Flooding	4
Agricultural land	3
Impact on heritage	5
Sewerage/Drainage	2
Employment	1

SAN015

In total 8 representations were made on this site by 7 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Lewis Watkinson		1385
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
Mr Terence Hopper		2924
Cllr Paul Carter	Sandwich TC	3306
Derek Parker		3451
Janet Holness		3677

No respondents stated that they agreed with the allocation of this site and 8 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific issues were raised

General Issues Raised

Issues	Number of responses
Too much housing	1
Highways problems	7
Police Station	1
Schools capacity	3
Healthcare capacity	3
Lack of local shops/services	1
General infrastructure	3
Habitats impact	2
Tree/landscape impact	3
Flooding	4
Impact on heritage	3
Employment	1

SAN019

In total 10 representations were made on this site by 8 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Lewis Watkinson		616
Cllr Paul Carter	Sandwich TC	1093
Miss Laura Fidler	Sandwich TC	1825
Sara Collins		2433
Howard Marshall		2437

Janet Holness		2494
Mr Terence Hopper		2925
Cllr Paul Carter	Sandwich TC	3307
Derek Parker		3451
Janet Holness		3677

1 respondent stated that they agreed with the allocation of this site and 7 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy criteria issues were raised.

General Issues Raised

Issues	Number of responses
Affordable housing	1
Lack of Public transport	1
Highways problems	6
Police Station	1
Schools capacity	4
Healthcare capacity	4
General infrastructure	2
General environmental	2
Habitats impact	3
Tree/landscape impact	5
Flooding	3
Character of area	1
Impact on heritage	5
Noise	1
Electric car charging points	1
Employment	1

SAN023

In total 34 representations were made on this site by 33 consultees. Representations were received from:

Name	Organisation	Comment ID (DLP)
Mr Richard Daniel		49
Mr Colin Watson		78
Mrs Jacqueline Watson		104
Mrs Nita Stannard		105
Mr Hugh Verrier		310
Lynne Sarafoglou		316
Mr Constantinos Sarafoglou		317
Derek Parker		324
Miss Kirsty Watson		379

Dr Graham Ciccone		590
Mr Steve Laslett	Sandwich Community Events	726
Fernham Homes Ltd	Developer	1617
Miss Laura Fidler	Sandwich TC	1826
Sara Collins		2433
Howard Marshall		2437
Janet Holness		2494
N Dilnot-Smith		2495
Ann Trim		2596
MR. Malcolm Sim		2775
Muriel Sim		2778
Alison Hall		2893
Mr Terence Hopper		2926
Gillian Mackintosh		3090
Derek Parker		3189
Sally Padovan		3191
John Padovan		3192
James Moore		3238
Cllr Paul Carter	Sandwich TC	3308
Arnold & Susan Delaney		3386
Griffiths		3416
Derek Parker		3451
David & Sarah Green		3500
Janet Holness		3677
Julie Davies	CPRE	3710

1 respondent stated that they agreed with the allocation of this site and 31 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy criteria issues were raised.

General Issues Raised

Issues	Number of responses
Brownfield land first	6
Lack of Public transport	3
Highways problems	27
Police Station	1
Schools capacity	6
Healthcare capacity	6
Lack of local shops/services	3
General infrastructure	6
Habitats impact	9
Tree/landscape impact	18
Flooding	18

Character of area	15
Agricultural land	2
Impact on heritage	9
Sewerage/Drainage	1
Light pollution	1
Electric car charging points	1
Employment	1

SHE003

In total 243 representations were made on this site by 233 consultees.
Representations were received from:

Name	Organisation	Comment ID
Mr alan coulter		DLP146
Mrs alan coulter		DLP151
Mr Gregory Sweetman		DLP161
Terence Hunt		DLP169
Mrs Patricia Smith		DLP171
Peter Jull		DLP231
Dr Tony Evans		DLP253
Mr Christopher May		DLP267
Mr Andrew Elliott		DLP299
Mrs Pauline Worsley		DLP307
Ms Angela Hathaway		DLP325
Mr Len Howell		DLP346
Mr Barry Sweetman		DLP347
Chris Gray		DLP350
Mrs Carole White		DLP359
Mrs Gill Vaughan		DLP364
Mrs Jacqueline Caruth		DLP375
Mr Stephen Addis		DLP391
Mrs Pauline Worsley		DLP418
Sandra Price		DLP424
Mrs Christine Newell		DLP436
Mr Andrew Elliott		DLP454
Mr Stephen Addis		DLP457
Mr Robert Edmond		DLP461
Mr Paul Vinten		DLP472
Mr Neville Spurgeon		DLP484
dr Attila Trombitas		DLP534
Mr Andy Pegler		DLP536
MRS Maureen Edmond		DLP539
Mrs Susan Taber		DLP550
Mr Chester Clarke		DLP595
Mr Bruce Brenchley		DLP597
Mr Mark Norcliffe		DLP600

Mr Mark Norcliffe		DLP604
Mrs ADRIANA CHIRILOV		DLP679
Mrs ADRIANA CHIRILOV		DLP681
Irene Collins		DLP686
Mrs Jenny Addis		DLP687
Mr Andrew Taylor		DLP690
Mr Christopher Collins		DLP693
Mrs Kate Leech		DLP705
Mr and Mrs John and Lin Saunders		DLP729
Mrs Joanna Taylor		DLP736
Ms Sophie Charman		DLP751
Steven Durbidge		DLP752
Mrs Janet Dray		DLP757
Professor Sarah Spurgeon		DLP763
Mr Michael Langley		DLP781
Steven Durbidge		DLP784
Mrs Sandra Langley		DLP790
mrs Sarah Bird		DLP857
Mr James Pascall		DLP892
mrs polly lockie		DLP909
Mr Simon Mcphee		DLP917
Mr Alexander Carpenter		DLP959
Mr Edward Higham		DLP973
Mrs Pamela Sweetman		DLP1010
Mrs Katie Gibbs		DLP1048
Mrs Katie Gibbs		DLP1051
Simon Drew		DLP1054
Mrs Katie Gibbs		DLP1056
Mrs Katie Gibbs		DLP1057
Mrs Katie Gibbs		DLP1060
Mr paul flood		DLP1083
Charlotte Jones		DLP1128
M L Page		DLP1196
Mrs Karen Flood		DLP1197
Keith Roberts		DLP1238
Mrs Christina Roberts		DLP1242
Mr Stephen Addis		DLP1339
Mr George Addis		DLP1363
Mr Guy Osborne		DLP1403
Mr Nathan Burns	Kent and Sussex Natural England	DLP1458
Tamzyn Janes	Southern Water	DLP1595
C D Tearle	Shepherdswell-with_Coldred PC	DLP1844
Edward Biggs	DDC Councillor	DLP1972

Linda Keen	DDC Councillor	DLP2015
Peter Walker	DDC Councillor	DLP2032
Mr Stan Wright		DLP2207
Jim Wooldridge		DLP2216
Jean Wooldridge		DLP2219
Julie Keeler		DLP2231
Ben Williams		DLP2237
Alan Williams		DLP2239
Shaun Williams		DLP2240
Patricia Balfour		DLP2254
Mr Kyle Banger		DLP2256
Alex Bardsley		DLP2257
Alex Bardsley		DLP2258
Kerry Bardsley		DLP2259
Kerry Bardsley		DLP2260
A J Barter		DLP2266
Mr & Mrs George & Elaine Betteridge		DLP2274
Patricia Bradley		DLP2317
Mr Bruce Brenchley		DLP2323
Mr Peter Brooker		DLP2325
Mr Peter Brooker		DLP2328
Emily Chapman		DLP2360
Matt Chapman		DLP2361
Mrs Laura Kent		DLP2369
Kelly Jarrett		DLP2374
Dr Daniel Knox		DLP2395
Lucy Little		DLP2404
David Lowe		DLP2425
Jennifer Comley		DLP2439
Mrs Teresa Goodbun		DLP2440
Barry Crush		DLP2454
Roger and Chris Cumes		DLP2456
Pamela Lowe		DLP2484
Anthony Lowe		DLP2492
Cindy Dixon		DLP2499
Mrs Francesca		DLP2502
Mr Joe Dray		DLP2506
Chris Dyer		DLP2516
Ronald Harris		DLP2519
Kathryn Hadlow		DLP2522
Steve Mardle		DLP2526
Deirdre Fagg		DLP2529
Christopher & Kim Finch		DLP2536
Lynn Webb		DLP2548
Mrs Lyndsey Watts		DLP2551

Graham Watts		DLP2552
Jan Tyrrell		DLP2590
Clive Turner-Stockham		DLP2591
Helen Turner-Stockham		DLP2592
Mrs Samantha Turk		DLP2593
Nicholas Turk		DLP2594
Kirsty Tanner		DLP2614
Gillian Tanner		DLP2615
Frank McPhee		DLP2628
David Henwood		DLP2632
Linda Symes		DLP2646
Gordon Henley		DLP2668
Susan Foster		DLP2671
Suzanne Flynn		DLP2673
Mrs Rosemary May		DLP2681
Della McLean		DLP2686
Chris Gabriel		DLP2697
Mrs Susan Gammon		DLP2705
Douglas Gardiner		DLP2707
Philip Stokes		DLP2748
Denise Simmons		DLP2771
Steven Simmons		DLP2772
Emma Schofield		DLP2793
Thomas Gough		DLP2866
Mrs Jan Griffin		DLP2875
Peter Ruthwell		DLP2888
Stephanie Ruthwell		DLP2889
Mrs Angela Hathaway		DLP2898
Anita Hoskins		DLP2930
Jill Roome		DLP2955
Revd Harvey Richardson		DLP3070
Mr Christopher May		DLP3118
Eva McCullough		DLP3120
Mr Nicholas McCullough		DLP3121
Kevin Regan		DLP3141
Mrs Lynn Regan		DLP3142
Mr Kevin Rainer		DLP3157
Barry Pullen		DLP3162
Ernest Plews		DLP3170
June Plews		DLP3171
Dido Plant		DLP3173
Sarah-Louise Penny		DLP3181
David Penny		DLP3182
Claire Penny		DLP3183
Chriscine Penny		DLP3184
Julie Pascall		DLP3186

Mr James Pascall		DLP3187
Ms Juliet Need		DLP3216
Pete Meiners		DLP3225
Michele Wood		DLP3274
Phil Wolfenden		DLP3277
Jennifer Wolfenden		DLP3279
D E Williamson		DLP3280
Mr J Williams		DLP3281
Mrs M Phillips		DLP3282
Tony White		DLP3284
Danny Vaughan		DLP3291
K W Symes		DLP3299
Lorraine Stone		DLP3325
B A Smith		DLP3337
Steven Mould		DLP3338
Frances Shaw		DLP3339
T Allen		DLP3341
Martyn Archbold		DLP3342
Michael Rook		DLP3343
Mrs Jill Rook		DLP3344
Simon Romney		DLP3345
Sheila Romney		DLP3346
Sheila Rogers		DLP3347
Beverley Roberts		DLP3351
John Reynolds		DLP3353
Julie Reed		DLP3354
Paul Reed		DLP3355
James Ralph		DLP3359
Mr & Miss Banner		DLP3361
Marita Bates		DLP3362
Rebekah Bates		DLP3363
Mr & Mrs Beale		DLP3364
Anne Beckitt		DLP3365
Julie Bishop		DLP3368
Mr A Brown		DLP3375
Raymond Brown		DLP3376
Mr Chester Clarke		DLP3380
Wendy Coulter		DLP3383
John Dickie		DLP3387
D Dixon		DLP3388
Mr Andrew Elliott		DLP3393
Mervyn & Susan Eyles		DLP3395
Tim Fagan		DLP3396
Cicely Finnis		DLP3397
John Gammon		DLP3401
Mr J Gates		DLP3403

Patricia Goddard		DLP3404
Mr & Mrs Godsmark		DLP3405
Christine Green		DLP3408
Kathryn Green		DLP3411
Robert Green		DLP3412
Roger Green		DLP3413
John Hooper		DLP3419
Carol Johnson		DLP3423
Mr & Mrs D Johnson		DLP3424
Michael Johnson		DLP3425
Jill Jones		DLP3426
Nicholas & Barbara Koleszar		DLP3427
Mrs S Lawrence		DLP3428
Jean Leveridge		DLP3429
B Marlow		DLP3431
Eva McCullough		DLP3436
Sally Mckenzie		DLP3437
Della McLean		DLP3438
Mr S Mulliner		DLP3443
Adrian Newell		DLP3444
Daniel Porter		DLP3454
Dernard & Elizabeth Porter		DLP3455
John Pyhyk		DLP3461
Mr and Mrs Young		DLP3483
Lynda Friend		DLP3517
Gary Little		DLP3568
Jamie Little		DLP3570
Katherine Durrant		DLP3571
Julie Davies	CPRE	DLP3711
Mr Kenneth Turrell		DLP3725

3 respondents stated that they agreed with the allocation of this site and 220 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England notes that this allocation is for large site which falls within the immediate outside of the Kent Downs AONB. We advise your plan to add a requirement for a masterplan with relevant landscape mitigation to be implemented. Such a master plan should be informed by a detailed LVIA in line with the GLVIA 3rd edition to ensure there are no negative impacts on the AONB. With respect to potential landscape impacts we also strongly advise that advice is sought and followed from the Kent Downs AONB unit on this allocation given

- Southern Water - have undertaken a preliminary assessment of the capacity of our existing infrastructure and its ability to meet the forecast demand for this proposal. The assessment reveals that existing local sewerage infrastructure to the site has limited capacity to accommodate the proposed development. Proposals for 100 dwellings at this site will generate a need for reinforcement of the wastewater network in order to provide additional capacity to serve the development. This reinforcement will be provided through the New Infrastructure charge to developers. We recommend the following key consideration is added to Policy: Occupation of development will be phased to align with the delivery of sewerage infrastructure, in liaison with the service provider.

General Issues Raised

Issues	Number of responses
Too much housing	9
Brownfield land first	15
Affordable housing	2
Air Quality	5
Lack of Public transport	15
Highways problems	218
Car parking	34
Schools capacity	67
Healthcare capacity	31
Lack of local shops/services	46
General infrastructure	53
General environmental	15
Habitats impact	78
Tree/landscape impact	69
Climate change	2
Flooding	49
Character of area	106
Agricultural land	10
Impact on heritage	7
Sewerage/Drainage	39
Water supply	6
Light pollution	8
AONB impact	6
Noise	5
Employment	3

SHE004

In total 191 representations were made on this site by 179 consultees.

Representations were received from:

Name	Organisation	Comment ID
Julie Bishop		DLP3368
Patricia and Ian Brading		DLP3372
Mr Warren Brading		DLP3373
Mr A Brown		DLP3375
Raymond Brown		DLP3376
Wendy Coulter		DLP3383
Zelda Daniels		DLP3384
Mr Andrew Elliott		DLP3393
Mervyn & Susan Eyles		DLP3395
Tim Fagan		DLP3396
Cicely Finnis		DLP3397
John Gammon		DLP3401
Patricia Goddard		DLP3404
Mr & Mrs Godsmark		DLP3405
Kathryn Green		DLP3410
Roger Green		DLP3414
John Hooper		DLP3419
Carol Johnson		DLP3423
Mr & Mrs D Johnson		DLP3424
Michael Johnson		DLP3425
Jill Jones		DLP3426
Mrs S Lawrence		DLP3428
Jean Leveridge		DLP3429
Sally Mckenzie		DLP3437
Della McLean		DLP3438
Mr S Mulliner		DLP3443
Daniel Porter		DLP3454
Bernard & Elizabeth Porter		DLP3455
Mr John Pyhyk		DLP3461
Mr and Mrs Young		DLP3483
Lynda Friend		DLP3517
Garry Little		DLP3568
Jamie Little		DLP3570
Katherine Durrant		DLP3571
M Dring		DLP3640
Mr Kenneth Turrell		DLP3725
Mr alan coulter		DLP148
Mrs Patricia Smith		DLP171
Dr Tony Evans		DLP253
Mr Christopher May		DLP267
Ms Angela Hathaway		DLP325

Mrs Jill Tipping		DLP351
Mr John Tipping		DLP352
Mrs Gill Vaughan		DLP366
Dr John Bulaitis		DLP368
Chris Gray		DLP413
Mrs Alison Poole		DLP446
Mrs Alison Poole		DLP447
Mr Andrew Elliott		DLP453
Mr Andrew Elliott		DLP454
Mr Stephen Addis		DLP457
Mr Robert Edmond		DLP462
Mr Mark Norcliffe		DLP600
Mr Mark Norcliffe		DLP601
Mrs Jenny Addis		DLP687
Mr Andrew Taylor		DLP690
Mrs Carole White		DLP694
Mrs Joanna Taylor		DLP736
Mrs Gill Vaughan		DLP753
Professor Sarah Spurgeon		DLP764
Steven Durbidge		DLP783
mrs Sarah Bird		DLP857
Mr James Pascall		DLP901
mrs polly lockie		DLP912
Mr Edward Higham		DLP983
Mrs Katie Gibbs		DLP1048
Simon Drew		DLP1054
Mrs Katie Gibbs		DLP1057
Keith Roberts		DLP1238
Mrs Christina Roberts		DLP1242
M L Page		DLP1343
Mrs Karen Flood		DLP1346
Mrs Katie Gibbs		DLP1374
Mrs Sandra Langlely		DLP1375
Mr Alexander Carpenter		DLP1379
Mrs Katie Gibbs		DLP1382
Ms Sophie Charman		DLP1389
Mrs Katie Gibbs		DLP1418
Charlotte Jones		DLP1421
Tamzyn Janes	Southern Water	DLP1596
C D Tearle	Shepherdswell-with_Coldred PC	DLP1844
Edward Biggs	DDC Councillor	DLP1972
Linda Keen	DDC Councillor	DLP2015
Peter Walker	DDC Councillor	DLP2032
Mr Stan Wright		DLP2208
Julie Keeler		DLP2231

Ben Williams		DLP2237
Shaun Williams		DLP2240
Patricia Balfour		DLP2254
Mr Kyle Banger		DLP2256
Alex Bardsley		DLP2257
Alex Bardsley		DLP2258
Kerry Bardsley		DLP2259
Kerry Bardsley		DLP2260
Darren and Camilla Bedford		DLP2270
Mr & Mrs George & Elaine Betteridge		DLP2274
Mr Bruce Brenchley		DLP2323
Mr Peter Brooker		DLP2325
Ben Brothwell		DLP2328
Emily Chapman		DLP2360
Matt Chapman		DLP2361
Mrs Laura Kent		DLP2369
Kelly Jarrett		DLP2374
Dr Daniel Knox		DLP2395
Lucy Little		DLP2404
Barry Crush		DLP2454
Cindy Dixon		DLP2499
Christine Dobson		DLP2500
Mrs Francesca Donaghy		DLP2502
Ronald Harris		DLP2519
Kathryn Hadlow		DLP2522
Steve Mardle		DLP2526
Deirdre Fagg		DLP2530
Christopher & Kim Finch		DLP2536
Mark Webb		DLP2547
Lynn Webb		DLP2548
Mrs Lyndsey Watts		DLP2551
Graham Watts		DLP2552
Jan Tyrrell		DLP2590
Clive Turner-Stockham		DLP2591
Helen Turner-Stockham		DLP2592
Kirsty Tanner		DLP2614
Gillian Tanner		DLP2615
Joyce Marks		DLP2623
Frank McPhee		DLP2628
David Henwood		DLP2632
Linda Symes		DLP2644
Gordon Henley		DLP2668
Susan Foster		DLP2671
Mrs Rosemary May		DLP2682

Della McLean		DLP2686
Chris Gabriel		DLP2698
Mrs Susan Gammon		DLP2704
Mrs Susan Gammon		DLP2705
Douglas Gardiner		DLP2707
Mike West	Consultant for landowner	DLP2710
Philip Stokes		DLP2748
Denise Simmons		DLP2771
Steven Simmons		DLP2772
Emma Schofield		DLP2793
Mike Goddard	Consultant for landowner	DLP2860
Mike Goddard	Consultant for landowner	DLP2861
Mrs Jan Griffin		DLP2876
Peter Ruthwell		DLP2888
Stephanie Ruthwell		DLP2889
Mrs Angela Hathaway		DLP2898
Jill Roome		DLP2955
Revd Harvey Richardson		DLP3070
Mr Christopher May		DLP3118
Kevin Regan		DLP3141
Mrs Lynn Regan		DLP3142
Mr Kevin Rainer		DLP3157
Barry Pullen		DLP3162
Ernest Plews		DLP3170
June Plews		DLP3171
Dido Plant		DLP3173
David Penny		DLP3182
Claire Penny		DLP3183
Chrsicne Penny		DLP3184
Julie Pascall		DLP3186
Mr James Pascall		DLP3187
Ms Juliet Need		DLP3216
Michele Wood		DLP3274
Phil Wolfenden		DLP3277
Jennifer Wolfenden		DLP3279
D E Williamson		DLP3280
Mr J Williams		DLP3281
Ms M Phillips		DLP3282
Tony White		DLP3284
Mr D W Walker		DLP3288
L A Walker		DLP3289
Danny Vaughan		DLP3291
K W Symes		DLP3300
Peter Sweet		DLP3303
Lorraine Stone		DLP3325
B A Smith		DLP3337

Steven Mould		DLP3338
Frances Shaw		DLP3339
T Allen		DLP3341
Martyn Archbold		DLP3342
Simon Romney		DLP3345
Sheila Romney		DLP3346
Sheila Rogers		DLP3347
Beverley Roberts		DLP3351
John Reynolds		DLP3353
Alan Randall		DLP3356
Iris Randall		DLP3357
James Ralph		DLP3359
Mr & Miss Banner		DLP3361
Marita Bates		DLP3362
Mr & Mrs Beale		DLP3364

3 respondents stated that they agreed with the allocation of this site and 167 respondents stated that they objected to its allocation.

Specific Issues Raised

Southern Water - we have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. This needs to be taken into account when designing the site layout. Easements would be required and should be clear of all proposed buildings and substantial tree planting. In consideration of the above, we recommend the following key consideration is added to Policy SHE004 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

General Issues Raised

Issues	Number of responses
Too much housing	5
Brownfield land first	13
Local needs housing	1
Affordable housing	7
Air Quality	12
Lack of Public transport	14
Highways problems	167
Car parking	28
Schools capacity	49
Healthcare capacity	33
Lack of local shops/services	53
General infrastructure	51
General environmental	11
Habitats impact	68
Tree/landscape impact	92

Climate change	
Flooding	35
Character of area	103
Agricultural land	3
Impact on heritage	12
Sewerage/Drainage	28
Water supply	4
Light pollution	3
AONB impact	2
Noise	9
Employment	2

SHE006

In total 173 representations were made on this site by 168 consultees.
Representations were received from:

Name	Organisation	Comment ID
Julie Bishop		DLP3368
B.A Bracknell		DLP3370
Mr A Brown		DLP3375
Raymond Brown		DLP3376
Jeff Chapman		DLP3378
Wendy Coulter		DLP3383
John Dickie		DLP3387
Mr Andrew Elliott		DLP3393
Mervyn & Susan Eyles		DLP3395
Tim Fagan		DLP3396
Cicely Finnis		DLP3397
Mr and Mrs Fitzgerald		DLP3399
John Gammon		DLP3401
Gladys Garnett		DLP3402
Mr J Gates		DLP3403
Patricia Goddard		DLP3404
Mr and Mrs Godsmark		DLP3405
Christine Green		DLP3408
Kathryn Green		DLP3409
Roger Green		DLP3415
John Hooper		DLP3419
Carol Johnson		DLP3423
Mr & Mrs D Johnson		DLP3424
Michael Johnson		DLP3425
Mrs S Lawrence		DLP3428
Jean Leveridge		DLP3429
B Marlow		DLP3431
Sally Mckenzie		DLP3437
Della McLean		DLP3438

Mr S Mulliner		DLP3443
Adrian Newell		DLP3445
Mr John Pyhyk		DLP3461
Mr and Mrs Young		DLP3483
Gary Little		DLP3568
Jamie Little		DLP3570
Katherine Durrant		DLP3571
Mr Kenneth Turrell		DLP3725
Mr alan coulter		DLP149
Mrs Patricia Smith		DLP171
Mr Christopher May		DLP267
Ms Angela Hathaway		DLP325
Mrs Susan Taber		DLP406
Chris Gray		DLP414
Mrs Alison Poole		DLP448
Mr Andrew Elliott		DLP454
Mr Stephen Addis		DLP457
Mr Robert Edmond		DLP465
Mr Paul Vinten		DLP474
Mrs Susan Taber		DLP548
Mrs Susan Taber		DLP550
Mr Mark Norcliffe		DLP600
Mrs Jenny Addis		DLP687
Mrs Carole White		DLP695
Mrs Joanna Taylor		DLP736
Mrs Gill Vaughan		DLP755
Professor Sarah Spurgeon		DLP762
Steven Durbidge		DLP785
mrs Sarah Bird		DLP857
Mr James Pascall		DLP905
mrs polly lockie		DLP916
Mr Edward Higham		DLP997
Mrs Katie Gibbs		DLP1048
Simon Drew		DLP1054
Mrs Katie Gibbs		DLP1057
Keith Roberts		DLP1238
Mrs Christina Roberts		DLP1242
Mrs Sue Ward	British Horse Society	DLP1326
Mr Stephen Addis		DLP1340
M L Page		DLP1344
Mrs Karen Flood		DLP1347
Mrs Sandra Langley		DLP1373
Mrs Katie Gibbs		DLP1377
Mr Alexander Carpenter		DLP1380
Mrs Katie Gibbs		DLP1383

Ms Sophie Charman		DLP1390
Mrs Katie Gibbs		DLP1419
Church Commissioners	Land owner	DLP1692
C D Tearle	Shepherdswell with Coldred PC	DLP1844
Edward Biggs	DDC Councillor	DLP1972
Linda Keen	DDC Councillor	DLP2015
Peter Walker	DDC Councillor	DLP2032
Mr Stan Wright		DLP2209
Jim Wooldridge		DLP2217
Julie Keeler		DLP2231
Ben Williams		DLP2237
Alan Williams		DLP2239
Shaun Williams		DLP2240
Patricia Balfour		DLP2254
Mr Kyle Banger		DLP2256
Alex Bardsley		DLP2257
Kerry Bardsley		DLP2259
Mr & Mrs George & Elaine Betteridge		DLP2274
Mr Bruce Brenchley		DLP2323
Mr Peter Brooker		DLP2325
Ben Brothwell		DLP2328
Emily Chapman		DLP2360
Matt Chapman		DLP2361
Mrs Laura Kent		DLP2369
Dr Daniel Knox		DLP2395
Lucy Little		DLP2404
Barry Crush		DLP2454
Cindy Dixon		DLP2499
Mrs Francesca Donaghy		DLP2502
Ronald Harris		DLP2519
Kathryn Hadlow		DLP2522
Steve Mardle		DLP2526
Deirdre Fagg		DLP2531
Christopher & Kim Finch		DLP2536
Lynn Webb		DLP2548
Mrs Lyndsey Watts		DLP2551
Graham Watts		DLP2552
Jan Tyrrell		DLP2590
Clive Turner-Stockham		DLP2591
Helen Turner-Stockham		DLP2592
Kirsty Tanner		DLP2614
Gillian Tanner		DLP2615
Frank McPhee		DLP2628
David Henwood		DLP2632
Linda Symes		DLP2645

Gordon Henley		DLP2668
Susan Foster		DLP2671
Mrs Rosemary May		DLP2683
Della McLean		DLP2686
Chris Gabriel		DLP2699
Mrs Susan Gammon		DLP2705
Douglas Gardiner		DLP2707
Philip Stokes		DLP2748
Denise Simmons		DLP2771
Steven Simmons		DLP2772
Emma Schofield		DLP2793
Peter Ruthwell		DLP2888
Stephanie Ruthwell		DLP2889
Mrs Angela Hathaway		DLP2898
Jill Roome		DLP2955
Revd Harvey Richardson		DLP3070
Mr Christopher May		DLP3118
Kevin Regan		DLP3141
Mrs Lynn Regan		DLP3142
Mr Kevin Raine		DLP3157
Barry Pullen		DLP3162
Dido Plant		DLP3173
David Penny		DLP3182
Claire Penny		DLP3183
Chrsicne Penny		DLP3184
Julie Pascall		DLP3186
Mr James Pascall		DLP3187
Mrs Christine Newell		DLP3211
Ms Juliet Need		DLP3216
Michele Wood		DLP3274
Jennifer Wolfenden		DLP3279
D E Williamson		DLP3280
Mr J Williams		DLP3281
Ms M Phillips		DLP3282
Tony White		DLP3284
Danny Vaughan		DLP3291
K W Symes		DLP3301
Lorraine Stone		DLP3325
B A Smith		DLP3337
Steven Mould		DLP3338
Frances Shaw		DLP3339
T Allen		DLP3341
Martyn Archbold		DLP3342
Michael Rook		DLP3343
Mrs Jill Rook		DLP3344
Simon Romney		DLP3345

Sheila Romney		DLP3346
Sheila Rogers		DLP3347
Beverley Roberts		DLP3351
John Reynolds		DLP3353
James Ralph		DLP3359
Mr & Miss Banner		DLP3361
Marita Bates		DLP3362
Mr and Mrs Beale		DLP3364

2 respondents stated that they agreed with the allocation of this site and 157 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - SHE006 would affect footpaths ER81/85 because the increase in traffic on Coxhill Road generated by the development would be detrimental to vulnerable users. ER85 is the subject of an application to upgrade to bridleway status, so this route assumes greater importance. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map. As a result I have included a number of footpaths which are the subject of active consideration for upgrade or have the potential to be upgraded before the cut off deadline of 2026.

General Issues Raised

Issues	Number of responses
Too much housing	2
Brownfield land first	10
Local needs housing	
Affordable housing	5
Air Quality	7
Lack of Public transport	21
Highways problems	154
Car parking	17
Schools capacity	54
Healthcare capacity	31
Lack of local shops/services	53
General infrastructure	34
General environmental	4
Habitats impact	61
Tree/landscape impact	83
Climate change	7
Flooding	45
Character of area	94
Agricultural land	8
Impact on heritage	10

Sewerage/Drainage	37
Water supply	5
Light pollution	
AONB impact	1
Noise	2
Employment	

SHE008

In total 138 representations were made on this site by 131 consultees.

Representations were received from:

Name	Organisation	Comment ID
Julie Bishop		DLP3368
Mr A Brown		DLP3375
Raymond Brown		DLP3376
Wendy Coulter		DLP3383
Mr Andrew Elliott		DLP3393
Mervyn & Susan Eyles		DLP3395
Tim Fagan		DLP3396
Cicely Finnis		DLP3397
John Gammon		DLP3401
Patricia Goddard		DLP3404
Mr and Mrs Godsmark		DLP3405
John Hooper		DLP3419
Carol Johnson		DLP3423
Michael Johnson		DLP3425
Mrs S Lawrence		DLP3428
Jean Leveridge		DLP3429
Della McLean		DLP3438
Mr S Mulliner		DLP3443
Mr John Pyhyk		DLP3461
Mr and Mrs Young		DLP3483
Lynda Friend		DLP3517
Gary Little		DLP3568
Jamie Little		DLP3570
Katherine Durrant		DLP3571
Mr Kenneth Turrell		DLP3725
Mr alan coulter		DLP150
Mrs Patricia Smith		DLP171
Mr Christopher May		DLP267
ms angela hathaway		DLP325
Mrs Alison Poole		DLP445
Mr Andrew Elliott		DLP454
Mr Stephen Addis		DLP457
Mr Robert Edmond		DLP467
Mr Mark Norcliffe		DLP600

Mrs Jenny Addis		DLP687
Mrs Joanna Taylor		DLP736
mrs Sarah Bird		DLP857
Mrs Katie Gibbs		DLP1048
Simon Drew		DLP1054
Mrs Katie Gibbs		DLP1057
Mrs Katie Gibbs		DLP1067
Keith Roberts		DLP1238
Mrs Christina Roberts		DLP1242
Mrs Sandra Langley		DLP1376
Mrs Katie Gibbs		DLP1378
Mr Alexander Carpenter		DLP1381
Mrs Katie Gibbs		DLP1384
Ms Sophie Charman		DLP1391
Mrs Katie Gibbs		DLP1420
C D Tearle	Shepherdswell-with-Coldred Parish Council	DLP1844
Cllr Edward Biggs	DDC Ward Councillor DDC WARD - Town and Castle	DLP1972
Cllr Linda Keen	DDC Ward Councillor DDC WARD - Aylesham, Eythorne and Shepherdswell	DLP2015
Cllr Peter Walker	DDC Ward Councillor DDC WARD - Aylesham, Eythorne and Shepherdswell	DLP2032
Mr Stan Wright		DLP2210
Julie Keeler		DLP2231
Shaun Williams		DLP2240
Patricia Balfour		DLP2254
Mr Kyle Banger		DLP2256
Alex Bardsley		DLP2257
Kerry Bardsley		DLP2259
Darren and Camilla Bedford		DLP2270
Mr & Mrs George & Elaine Betteridge		DLP2274
Mr Bruce Brenchley		DLP2323
Mr Peter Brooker		DLP2325
Ben Brothwell		DLP2328
Emily Chapman		DLP2360
Matt Chapman		DLP2361
Mrs Laura Kent		DLP2369
Dr Daniel Knox		DLP2395
Lucy Little		DLP2404
Cindy Dixon		DLP2499
Mrs Francesca Donaghy		DLP2502
Ronald Harris		DLP2519

Kathryn Hadlow		DLP2522
Steve Mardle		DLP2526
Christopher & Kim Finch		DLP2536
Lynn Webb		DLP2548
Mrs Lyndsey Watts		DLP2551
Graham Watts		DLP2552
Clive Turner-Stockham		DLP2591
Helen Turner-Stockham		DLP2592
Kirsty Tanner		DLP2614
Gillian Tanner		DLP2615
Frank McPhee		DLP2628
David Henwood		DLP2632
Gordon Henley		DLP2668
Susan Foster		DLP2671
Mrs Rosemary May		DLP2684
Della McLean		DLP2686
Chris Gabriel		DLP2700
Mrs Susan Gammon		DLP2705
Douglas Gardiner		DLP2707
Philip Stokes		DLP2748
Denise Simmons		DLP2771
Steven Simmons		DLP2772
Emma Schofield		DLP2793
Mrs Jan Griffin		DLP2877
Peter Ruthwell		DLP2888
Stephanie Ruthwell		DLP2889
ms angela hathaway		DLP2898
Revd Harvey Richardson		DLP3070
Mr Christopher May		DLP3118
Kevin Regan		DLP3141
Mrs Lynn Regan		DLP3142
Mr Kevin Raine		DLP3157
Barry Pullen		DLP3162
Dido Plant		DLP3173
David Penny		DLP3182
Claire Penny		DLP3183
Chiscine Penny		DLP3184
Julie Pascall		DLP3186
Mr James Pascall		DLP3187
Ms Juliet Need		DLP3216
Michele Wood		DLP3274
Jennifer Wolfenden		DLP3279
D E Williamson		DLP3280
Mr J Williams		DLP3281
Ms M Phillips		DLP3282
Tony White		DLP3284

Danny Vaughan		DLP3291
Peter Sweet		DLP3303
Lorraine Stone		DLP3325
B A Smith		DLP3337
Steven Mould		DLP3338
Frances Shaw		DLP3339
T Allen		DLP3341
Martyn Archbold		DLP3342
Simon Romney		DLP3345
Sheila Romney		DLP3346
Sheila Rogers		DLP3347
Beverley Roberts		DLP3351
John Reynolds		DLP3353
Alan Randall		DLP3356
Iris Randall		DLP3357
James Ralph		DLP3359
Mr & Miss Banner		DLP3361
Marita Bates		DLP3362
Mr and Mrs Beale		DLP3364

1 respondents stated that they agreed with the allocation of this site and 123 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy criteria issues were raised

General Issues Raised

Issues	Number of responses
Too much housing	7
Brownfield land first	11
Local needs housing	
Affordable housing	5
Air Quality	1
Lack of Public transport	
Highways problems	118
Car parking	10
Schools capacity	48
Healthcare capacity	24
Lack of local shops/services	45
General infrastructure	33
General environmental	4
Habitats impact	52
Tree/landscape impact	69
Climate change	
Flooding	32

Character of area	86
Agricultural land	3
Impact on heritage	7
Sewerage/Drainage	17
Water supply	4
Light pollution	1
AONB impact	
Noise	7
Employment	1

SH0002

In total 8 representations were made on this site by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull	DDC Councillor	270
Nick Banks	Richborough Estates Limited	1252
Nathan Burns	Natural England	1462
Mr Kevin Lynch	Sholden PC	1865
Helen Williams	DDC Councillor	2423
Sarah Gleave	Dover and Deal Green Party	2800
Sarah Gleave	Dover and Deal Green Party	2806
Sarah Gleave	Dover and Deal Green Part	3671

1 respondent stated that they agreed with the allocation of this site and 4 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England - Given the scale and close proximity to the Thanet Coast and Sandwich Bay SPA and Ramsar site and the Sandwich Bay to Hacklinge Marshes SSSI we advise a requirement to be implemented for a project level HRA for future applications. This HRA should chiefly consider the potential in-combination impacts pathways of increased recreational disturbance, direct habitat losses, loss of functionally linked habitat, changes in air quality and increased contaminated surface water run-off.

General Issues Raised

Issues	Number of responses
Too much housing	2
Air Quality	1
Lack of Public transport	1
Highways problems	1
Schools capacity	1
Healthcare capacity	1

General infrastructure	1
Habitats impact	1
Tree/landscape impact	3
Flooding	1
Character of area	3
Sewerage/Drainage	1
Employment	1

SH0004

In total 5 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Nathan Burns	Kent and Sussex Natural England	1462
Cllr Helen Williams	DDC Councillor	2423
Ms Sarah Gleave	Dover and Deal Green Party	2800
Ms Sarah Gleave	Dover and Deal Green Party	2806
Ms Sarah Gleave	Dover and Deal Green Party	3671

no respondents stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific Issues Raised

- Natural England - Given the allocations scale and close proximity to the Thanet Coast and Sandwich Bay SPA and Ramsar site and the Sandwich Bay to Hacklinge Marshes SSSI we advise a requirement to be implemented for a project level HRA for future applications. This HRA should chiefly consider the potential in-combination impacts pathways of increased recreational disturbance, direct habitat losses, loss of functionally linked habitat, changes in air quality and increased contaminated surface water run-off.

General Issues Raised

Issues	Number of responses
Too much housing	1
Highways problems	1
Schools capacity	1
Healthcare capacity	1
General infrastructure	1
Habitats impact	1
Tree/landscape impact	1
Climate change	2
Sewerage/Drainage	1
Employment	1

STA004

In total 2 representations were made on this site by 2 consultees. Representations were received from:

Name	Organisation	Comment ID
David Parfitt	Land owner	3449
Julie Davies	CPRE	3713

No respondents stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- Question over the need for a mineral's assessment.
- CRPE - A new development is in progress, adjoins this site and is unable to fulfil the net gain in biodiversity provision. We would like to see this site set aside for an Offsetting Scheme to compensate for the loss of habitat on the adjacent site.

General Issues Raised

No general issues were raised.

STM003

In total 5 representations were made on this site by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Maureen Woods		288
Mr James Mitchell		651
Katie Miller	Kent Downs AONB	1483
Jane Cook	St Margaret's-at-Cliffe PC	1880
Catherine Elizabeth Marshall		3524

1 respondent stated that they agreed with the allocation of this site and 2 respondents stated that they objected to its allocation.

Specific Issues Raised

- AONB The majority of the site lies within the AONB and the site lies outside of the current village confines. We support the requirement for a sensitive landscaping scheme in addition to a landscape buffer being required, but consider details of this need to be specified i.e. along the south-western boundary and to incorporate trees. Given the edge of village location, we also have concerns that the specified density is too high and should be reduced to provide a more appropriate transition to the rural landscape beyond.

General Issues Raised

Issues	Number of responses
Too much housing	1
Brownfield land first	1
Affordable housing	1
Highways problems	3
Schools capacity	1
Tree/landscape impact	1
Character of area	1
Agricultural land	1
Impact on heritage	1
AONB impact	2

STM006

In total 2 representations were made on this site by x consultees. Representations were received from:

Name	Organisation	Comment ID
Katie Miller	Kent Downs AONB	1483
Jane Cook	St Margaret's-at-Cliffe PC	1880

No respondents stated that they agreed with the allocation of this site and No respondents stated that they objected to its allocation.

Specific Issues Raised

- AONB unit - The site lies wholly within the AONB, but relates well to existing settlement pattern on the east side of Station Road. While well screened from views from Station Road, the site is potentially more visible from the open countryside to the east, due to the topography of the land and a well-used public right of way network. We therefore welcome the requirement for a sensitive landscaping scheme in addition to a landscape buffer to be required to mitigate impact, however request that the location of the buffer is specified i.e. along the north-eastern boundary.
- AONB unit - We note that the site is considered suitable for executive houses. Such houses are often designed in a way that fails to be locally distinctive to the Kent Downs (over-scaled, large areas of glazing, modern materials) and we consider the policy would benefit from an additional requirement for the design to be appropriate to the sites sensitive location within the Kent Downs AONB in respect of scale, form and materials.

General Issues Raised

Issues raised: Impact on AONB, school capacity, highways impacts

STM007

In total 11 representations were made on this site by 11 consultees. Representations were received from:

Name	Organisation	Comment ID
Angela & Anthony Condon		DLP3382
Karen Banks	Planning Consultant	DLP3613
Susan Borland		DLP178
Mr R Young		DLP286
N Claringbould	RC Claringbould and Sons	DLP1111
Katie Miller	Kent Downs AONB	DLP1485
Tamzyn Janes	Southern Water	DLP1598
Jane Cook	St Margaret's-at-Cliffe PC	DLP1882
John Flowerdew		DLP2690
Carlo Nuvoletta		DLP3202
Sharon Nuvoletta		DLP3203

2 respondents stated that they agreed with the allocation of this site and 6 respondents stated that they objected to its allocation.

Specific Issues Raised

- AONB unit - Agree that a sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact and that existing trees and hedgerow should be retained where possible. We consider it important to specify that the landscape buffer should be provided along the south eastern boundary. We have concerns that providing the new access from Dover Road could have potentially unacceptable impacts on this important approach to the village, which is also within the AONB, requiring the removal of established trees and opening up views of the site. We therefore consider it essential for it to be specified that access should only be from Townsend Farm Road. In order to minimise access impacts, the site should be brought forward with STM008.
- Southern Water - have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added, Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

General Issues Raised

Issues	Number of responses
Too much housing	1
Brownfield land first	
Local needs housing	
Affordable housing	1

Air Quality	
Lack of Public transport	
Highways problems	7
Car parking	2
Schools capacity	5
Healthcare capacity	4
Lack of local shops/services	2
General infrastructure	
General environmental	2
Habitats impact	4
Tree/landscape impact	3
Climate change	
Flooding	5
Character of area	3
Agricultural land	
Impact on heritage	5
Sewerage/Drainage	1
Water supply	
Land stability	
AONB impact	6
Noise	
Employment	1

STM008

In total 11 representations were made on this site by 11 consultees. Representations were received from:

Name	Organisation	Comment ID
Angela & Anthony Condon		DLP3382
Miss Karen Banks		DLP3613
Susan Borland		DLP178
Mr R Young		DLP286
Mr N Claringbould	RC Claringbould and Sons	DLP1111
Katie Miller	Kent Downs AONB	DLP1486
Tamzyn Janes	Southern Water	DLP1599
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1883
John Flowerdew		DLP2690
Carlo Nuvoletta		DLP3202
Sheron Nuvoletta		DLP3203

2 respondents stated that they agreed with the allocation of this site and 6 respondents stated that they objected to its allocation.

Specific Issues Raised

- AONB unit - This site lies partially within the AONB. We agree that a sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact and that existing trees and hedgerow should be retained where possible. As with STM007, we have concerns that providing the new access from Dover Road could have potentially unacceptable impacts on this important approach to the village, requiring the removal of established trees and opening up views of the site. We therefore consider it essential for it to be specified that access should only be from Townsend Farm Road. These two sites should be brought forward together to minimise access impacts.
- Southern Water - undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy STM008 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose

General Issues Raised

Issues	Number of responses
Too much housing	1
Affordable housing	1
Highways problems	7
Schools capacity	5
Healthcare capacity	4
Lack of local shops/services	1
General environmental	4
Habitats impact	4
Tree/landscape impact	2
Character of area	2
Impact on heritage	5
Sewerage/Drainage	4
AONB impact	6
Employment	5

WAL002

In total 246 representations were made on this site by 243 consultees. Representations were received from:

Name	Organisation	Comment ID
Y Boden		DLP3369
Dr & Mrs Butt		DLP3377
Simon Darragh		DLP3385
Michael Eastbrook		DLP3391
Rosemary Eastbrook		DLP3392
Jennifer Esposito		DLP3394

Mr and Mrs Fitch		DLP3398
Lindsay Gorringe		DLP3406
Radley Gorringe		DLP3407
Mrs D Hammond		DLP3417
Shirley Howard		DLP3420
Katherine Martin		DLP3432
Oliver Martin		DLP3433
Tracey Martin		DLP3434
Mr & Mrs Mishkin		DLP3439
P Moore		DLP3441
D.T Northcott		DLP3446
Y Northcott		DLP3447
Mr A Parielis		DLP3450
Mr & Mrs Pressnell		DLP3458
Bruce Laird		DLP3462
R.D Horton		DLP3496
John Turgoose		DLP3497
Kris Lancaster		DLP3513
Keith Rawlings		DLP3514
Stephen Braithwaite		DLP3518
Arlette Fuller		DLP3519
Susan and Anthony Relf		DLP3531
Helga Wood		DLP3534
David Yates		DLP3535
Deborah Cain		DLP3540
Deborah Cain		DLP3541
Elaine Cartledge		DLP3543
Neil Fearn		DLP3546
Clive Mannerings		DLP3548
Martin Wyman		DLP3552
Kathryn Hewitt		DLP3554
Lynne Nazareth		DLP3557
Jo Radcliffe		DLP3561
Paula Aston		DLP3566
Alan Grinsted		DLP3642
Mr Tracy Hawkes		DLP3700
Julie Davies	CPRE	DLP3714
Mrs Elizabeth Lellow		DLP42
Mr Sam Culpin		DLP46
RICHARD GIFFORD		DLP60
Dr Phil Peach		DLP69
Mr Graham Graves		DLP73
Mrs Angela Shrimpton		DLP80
kirsty Barnett		DLP147
Patricia Aldersley		DLP168

Mr Christopher Baker		DLP173
Mr & Mrs N Brookes		DLP184
Mr John Cresswell		DLP189
Mrs Angela Cresswell		DLP190
Perry Davison		DLP196
Mrs Deborah Davison		DLP197
Mr Rana Eymur		DLP281
Lorely Brimson		DLP305
William Veale		DLP311
Doreen Scholfield		DLP312
Mrs Sarah Spong		DLP314
Mr Alan Spong		DLP315
Miss Lucy Rattenbury		DLP318
Mr Justin Ramsay		DLP320
Mr Keith Playforth		DLP323
Reverend Seth Cooper		DLP336
Miss Phoebe Underwood		DLP363
Peter Norris		DLP381
Mr Carola de Settle		DLP386
Jeremy Swallow		DLP395
Audrey Blacklock		DLP397
Mr Andrew Weiss		DLP408
Mr John Hilson		DLP437
Mrs Julia Lamont-Weiss		DLP456
Mr Philip Fox		DLP489
Mr David Denton		DLP491
Mr William McGrory		DLP578
MRS Janice Garrett		DLP682
Mrs Brian Lloyd		DLP688
Mr Tim Taylor		DLP758
Mr Andrew Lawrence		DLP839
Mrs Amanda Lawrence		DLP847
Andrew Ferguson		DLP848
Judith Clarke		DLP994
Anna Spain		DLP1106
Mr Martin Stone		DLP1251
Paul Wood		DLP1269
Roger Garrett		DLP1356
Mr Nathan Burns	Kent and Sussex Natural England	DLP1461
Mr Alan Byrne	Historic England	DLP1657
Mike Eddy	Walmer PC	DLP1994
Kelly Lawrence	Deal TC	DLP2120

Elizabeth Zdziebko		DLP2203
Joanna Woolley		DLP2212
Isobel Wiseman		DLP2226
Jade Andrews		DLP2229
Tim and Teresa Ashley		DLP2242
Elaine Kendrick		DLP2243
Jerran Bailey		DLP2250
Paul Barrett		DLP2265
Peter Bates		DLP2269
James Bird		DLP2297
Mr Colin Broughton		DLP2329
Ian Broughton		DLP2331
Vanessa Broughton		DLP2334
Caroline Cannons		DLP2345
Paul Cannons		DLP2347
Barbara Carmichael		DLP2350
MR andrew carson		DLP2351
Geoffrey Lewis Case		DLP2353
Sue Chapman		DLP2362
Pamela Charles		DLP2364
Simon Churchill		DLP2370
Toby Churchill		DLP2373
Fiona Clark		DLP2376
Alec Clayson		DLP2378
Lindy Jones		DLP2385
Susan Clayson		DLP2388
Jill Cliff		DLP2410
Cllr Derek Murphy	DDC Councillor	DLP2418
Cllr Helen Williams	DDC Councillor	DLP2419
Jane Coles		DLP2428
Sally Colligan		DLP2429
Patricia Grist		DLP2436
Peter Corfe		DLP2445
Richard Cresswall		DLP2450
Maureen Cross		DLP2453
Dr Sharon Danby		DLP2460
Mrs Veronica Goodban		DLP2461
Annette Davies		DLP2462
Susan Harding		DLP2478
Mr Phillip Deschamps		DLP2482
Guy Maginn		DLP2486
Maisie-Jayne Lahr		DLP2490
Roger Driver		DLP2507
Shirley Eberlein		DLP2517
Kenneth Green		DLP2523

Carole Ellis		DLP2524
Mauro Feltrin		DLP2534
David Warwick		DLP2576
Elizabeth Warwick		DLP2577
Jenifer Wakelyn		DLP2581
Ross Wakefield		DLP2583
Lyndon Wainwright		DLP2584
Mr Russell Thompson		DLP2607
Susan Tann		DLP2613
Neil Maynard		DLP2616
Elizabeth and Christopher Flint		DLP2622
David Matthews		DLP2633
William Swallow		DLP2647
Valerie Swallow		DLP2648
Martin Frawley		DLP2655
Mrs Susan Sullivan		DLP2657
Dr Dominic Jones		DLP2674
Helen Foulkes		DLP2691
Jolene Frawley-Bailey		DLP2693
Paul Gamble		DLP2703
Oldie & John Gausden		DLP2722
Veronica Gibson		DLP2724
Alan & Sarah Gleave		DLP2727
Mrstry5ide Catherine Stone		DLP2743
Angela Stone		DLP2746
Tony Stickels	Hawksdown Estate (Walmer) Limited	DLP2749
Tony Stickels		DLP2750
Mrs Phetrin Snow		DLP2755
Nicola Snow		DLP2756
Jason Snow		DLP2757
Aaron Snow		DLP2758
Stephen Smith		DLP2759
Lesley Smith		DLP2761
Antony Shepherd		DLP2783
john sharvill		DLP2785
Ms Julie Shannon		DLP2786
Dennis Hill		DLP2787
Nicola Scott		DLP2788
Dr Stefan Schulz		DLP2789
Dr Anca Schulz		DLP2790
Ms Sarah Gleave	Dover and Deal Green Party	DLP2800
Elizabeth Goode		DLP2862

Leonard Goode		DLP2863
Ben Gorringe		DLP2864
Rebecca Gorringe		DLP2865
Brenda Gray		DLP2871
Mr Paul Groves		DLP2883
C Harbridge		DLP2897
Heather Rowell	North Deal Community Company Ltd	DLP2900
Charles Rowell		DLP2901
Robert Hogben		DLP2911
Adrian Rose		DLP2953
Sue Lamoon		DLP2966
Clive Chandler		DLP2969
Charlotte Rogers		DLP3046
Jill Roche		DLP3052
Edward Roche		DLP3063
Robert Riddle		DLP3069
Mrs Deborah Longland		DLP3071
Simon Longland		DLP3074
John Lonsdale		DLP3075
Daphne Marsden		DLP3095
John Marsden		DLP3096
Louis Martin		DLP3108
Michael Martin		DLP3109
Georgina Maude		DLP3117
Melanie McGrath		DLP3123
Paul Mckenna		DLP3125
Nicola Richards		DLP3130
John Richards		DLP3131
Eve Richards		DLP3132
Rosie Rechter		DLP3146
Norman Rechter		DLP3147
Mr Justin Ramsay		DLP3153
Jonathan Pond		DLP3166
Paul Plater		DLP3172
Mrs Lee Pickup		DLP3174
Neil Oldfield		DLP3199
Claire Olcott		DLP3200
Christine Odell		DLP3201
Jennifer Norton		DLP3204
Rev Roger North		DLP3205
Paul Norris		DLP3206
Christine Nicholls		DLP3208
Brian Nicholls		DLP3209
Elizabeth Neaves		DLP3219

Cynthia Mercer		DLP3228
Deborah Moggach		DLP3236
Elaine Mordaunt		DLP3243
Suzanne Mulvaney		DLP3268
Mrs D Wood		DLP3272
Richard Munns		DLP3273
Dr Claire Scholfield-Myers		DLP3275
Mr Jon-Paul Myers		DLP3276
Isobel Myers		DLP3278
J Wall		DLP3287
Matthew Sims		DLP3292
Michael Brimson		DLP3293
Nicholas Kingsley-Smith		DLP3294
D Relf		DLP3295
Elizabeth Carney		DLP3296
Y P Bodern		DLP3297
Mrs Linda Storrie		DLP3319
Henry Abraham		DLP3336
Gillian Shanks		DLP3340
C J Roberts		DLP3349
Mr Christopher Baker		DLP3350
Sandra Baker		DLP3360

No respondents stated that they agreed with the allocation of this site and 239 respondents stated that they objected to its allocation.

A petition was received from change.org totally some 843 entries opposing development of WAL002. Whilst the intention of the petition is acknowledged, the entries cannot be counted toward representations due to incomplete address details of the entrants.

Specific Issues Raised

- Natural England - site which falls within the setting of the Kent Downs AONB. As such the development must be designed to conserve and enhance the character of the Kent Downs AONB. With regards to the setting of the Kent Downs AONB we strongly advise your plan to add a requirement for a masterplan with relevant landscape mitigation to be implemented.
- Historic England - A heritage impact assessment is required to identify any necessary measures to avoid or minimise harm to the Register Park and Garden and Castle of Walmer, and on the significance of the nearby undesignated historic First World War Aerodrome and Second World War radar station.

General Issues Raised

Issues	Number of responses
Too much housing	8
Brownfield land first	34
Local needs housing	
Affordable housing	14
Air Quality	26
Lack of Public transport	13
Highways problems	184
Car parking	6
Schools capacity	53
Healthcare capacity	42
Lack of local shops/services	48
General infrastructure	36
General environmental	27
Habitats impact	138
Tree/landscape impact	147
Climate change	14
Flooding	91
Character of area	55
Agricultural land	54
Impact on heritage	23
Sewerage/Drainage	21
Water supply	8
Land stability	5
AONB impact	48
Noise	11
Employment	19

WHI006

No representations were made on this site.

WIN003

In total 9 representations were made on this site by 7 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Micheala clay		DLP110
Mr Norman Baldwin		DLP176
Messrs Upton		DLP417
Christopher Pike		DLP737
Christopher Pike		DLP754
Lynn Nichols		DLP1233
Lynn Nichols		DLP1235
Kerry Coltham	Wingham PC	DLP1830
Jacky Ruddock		DLP2891

1 respondents stated that they agreed with the allocation of this site and 5 respondents stated that they objected to its allocation.

Specific Issues Raised

No specific policy issues were raised

General Issues Raised

Issues	Number of responses
Air Quality	1
Highways problems	4
Car parking	2
General infrastructure	1
General environmental	1
Habitats impact	1
Tree/landscape impact	1
Flooding	1
Character of area	1
Agricultural land	2
Noise	3

WIN004

In total 3 representations were made on this site by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Richard Stevens	Site promoter	DLP74
Kerry Coltham	Wingham PC	DLP1830
Jacky Ruddock		DLP2891

1 respondent stated that they agreed with the allocation of this site and 1 respondent stated that they objected to its allocation.

Specific Issues Raised

- No specific issues were raised

General Issues Raised

- The objector raised issues of highways, character of the area and landscape

WIN014

In total 11 representations were made on this site by 9 consultees. Representations were received from:

Name	Organisation	Comment ID
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Mrs Micheala clay		DLP110
Mr karl clay		DLP111
Mr Norman Baldwin		DLP176
Christopher Pike		DLP737
Christopher Pike		DLP754
Lynn Nichols		DLP1233
Lynn Nichols		DLP1235
Tamzyn Janes	Southern Water	DLP1600
Rachel Allwood	Wingham Heritage Site promoter	DLP1689
Kerry Coltham	Wingham PC	DLP1830
Jacky Ruddock		DLP2891

1 respondent stated that they agreed with the allocation of this site and 6 respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - we have undertaken a preliminary assessment of the site that has revealed that Southern Water's underground infrastructure crosses this site. Easements would be required and should be clear of all proposed buildings and substantial tree planting. We recommend the following key consideration is added to Policy WIN014 Layout is planned to ensure future access to existing wastewater infrastructure for maintenance and upsizing purpose.

General Issues Raised

Issues	Number of responses
Air Quality	1
Highways problems	6
General infrastructure	1
Tree/landscape impact	1
Flooding	1
Character of area	1
Agricultural land	1
Noise	3

W00005

In total 2 representations were made on this site by 2 consultees. Representations were received from:

Name	Organisation	Comment ID
Jonathan Vickers	P W Vickers & Son - site promoter	DLP1277
Tamzyn Janes	Southern Water	DLP1602

1 respondent stated that they agreed with the allocation of this site and No respondents stated that they objected to its allocation.

Specific Issues Raised

- Southern Water - The proposed development lies within a Source Protection Zone around one of Southern Water's public water supply sources as defined under the Environment Agency's Groundwater Protection Policy. We would advise that the developer would need to protect the groundwater to the satisfaction of the Environment Agency

General Issues Raised

No general issues were raised

WOO006

In total 1 representation was made on this site by 1 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Alan Byrne	Historic England	DLP1658

The respondent did not specify whether they supported or objected to its allocation.

Specific Issues Raised

- Historic England - The site is close to the moated medieval site at Grove Farm Scheduled Monument; a heritage impact assessment and archaeological assessment should be required.

General Issues Raised

No general issues were raised

WOR006

In total 29 representations were made on this site by 29 consultees. Representations were received from:

Name	Organisation	Comment ID
Michael Attenborough		DLP219
Mrs Carol Attenborough		DLP220
John Stevens	Finn's - site promoter	DLP371
Mrs Sue Ward	British Horse Society	DLP1327
Mr Kevin Lynch	Worth PC	DLP1850
Martin Woods		DLP2220
Aidan Bywater		DLP2222

Anne Anderson		DLP2224
Nigel Anderson		DLP2225
Caroline Austin		DLP2244
Mr Ian Austin		DLP2248
Miss Sharon Barnes		DLP2262
Idris Mehmet		DLP2263
Mr Malcolm Bernardes		DLP2272
Valerie Brown		DLP2338
Michael Bywater		DLP2344
Kirsty Cavell		DLP2359
Jane Wilkinson		DLP2405
John Wilkinson		DLP2417
Christopher Crofts		DLP2452
J Davies		DLP2464
Teresa Valvona		DLP2587
Daniel & Linda Lang		DLP2676
Diocese Of Canterbury	Site promoter WOR007	DLP2751
Jane Goddard		DLP2859
Peter Hobbs		DLP2908
Sandra Hudson		DLP2942
Jeanette Parker		DLP3188
mr Alan Mollatt		DLP3237

1 respondent stated that they agreed with the allocation of this site and 27 respondents stated that they objected to its allocation.

Specific Issues Raised

- British Horse Society - WOR006/7 are likely to impact adversely on byways EE243 and EE236 and bridleway EE236 because of the increase in traffic generated by development. The British Horse Society is currently working to identify lost PROWs or PROWs that could be upgraded on the Definitive Map. As I result I have included a number of footpaths which are the subject of active consideration for upgrade or have the potential to be upgraded before the cut off deadline of 2026.
- Conflict with the Worth Neighbourhood Plan

General Issues Raised

Issues	Number of responses
Brownfield land first	1
Affordable housing	1
Air Quality	3
Lack of Public transport	1
Highways problems	20
Car parking	13
Lack of local shops/services	2

General infrastructure	6
General environmental	1
Habitats impact	21
Tree/landscape impact	9
Flooding	10
Character of area	11
Agricultural land	9
Sewerage/Drainage	20
Noise	2
KCC minerals area	3

WOR009

In total 34 representations were made on this site by 34 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr T Mayes		DLP3435
Mr James Donaldson		DLP213
Michael Attenborough		DLP219
Mrs Carol Attenborough		DLP220
Ms Deverill Sally Deverill		DLP982
Carl Thomason	Sunning Dale	DLP1631
Mr Alan Byrne	Historic England	DLP1659
Mr Kevin Lynch	Worth PC	DLP1851
Anne Anderson		DLP2224
Nigel Anderson		DLP2225
Keith and Gillian Andrews		DLP2233
Caroline Austin		DLP2246
Mr Ian Austin		DLP2249
Miss Sharon Barnes		DLP2262
Idris Mehmet		DLP2263
Mr Malcolm Bernardes		DLP2273
Valerie Brown		DLP2338
Michael Bywater		DLP2344
Kirsty Cavell		DLP2359
Diane Checksfield		DLP2365
Jane Wilkinson		DLP2405
John Wilkinson		DLP2417
Christopher Crofts		DLP2452
J Davies		DLP2464
Carol Gray		DLP2475
Ms Deverill Sally Deverill		DLP2487
Melanie Weir		DLP2544
Daniel & Linda Lang		DLP2677
Jane Goddard		DLP2859
Sandra Hudson		DLP2942

chris rooke		DLP2956
Sandra Martinez		DLP3107
Janice Rawcliffe		DLP3148
Jeanette Parker		DLP3188

1 respondent stated that they agreed with the allocation of this site and 31 respondents stated that they objected to its allocation.

Specific Issues Raised

- Historic England - The site is in the setting of a number of Grade II Listed Buildings; a heritage impact assessment to identify possible measures to avoid or minimise harm is required.
- Conflict with the Worth Neighbourhood Plan

General Issues Raised

Issues	Number of responses
Air Quality	1
Highways problems	22
Car parking	1
Schools capacity	1
Lack of local shops/services	1
General infrastructure	6
General environmental	2
Habitats impact	14
Tree/landscape impact	1
Flooding	7
Character of area	3
Agricultural land	11
Impact on heritage	3
Sewerage/Drainage	19
Noise	4

Council's Response to non-strategic site allocations representations

All the comments made on individual sites will be carefully considered and issues rectified or updated where relevant, but it is important to note that inclusion of sites for allocation in the next stage of the plan must be weighed against the issues relating to district wide housing needs outlined above in this report, and the results of the site assessment work undertaken through the HELAA and SA process. Changes will be proposed to site allocation based on responses received, this will include an assessment of site suitability and deliverability and specific site details and criteria, which may lead to specific site allocation criteria in the detailed policies within the Reg 19 version of the plan, where they are considered essential to the site design and deliverability. There will also be amendments to site capacity where specific site

evidence or constraints has suggested this should be revised. Not all sites will be carried forward where significant issues are identified.

With regards to comments from statutory consultees regarding constraints and infrastructure requirements for the sites, these will be considered in more detail and further discussion will take place to ensure all statutory requirements are met by the final policy criteria

With regards to the planning applications received on the sites, the planning application process is distinctly separate from that of the Local Plan, and the comments made on the application will be considered as part of that process. Where sites receive a planning consent prior to Regulation 19 stage, these will be removed as allocations.

This local plan consultation has enabled site promoters of new sites to submit their site to the Local Plan process for consideration, and all new sites have been added to the revised HELAA document published alongside the Reg 19 consultation, this may result in new, more suitable sites, being identified in the next stage of the plan. New and updated planning application and deliverability data will also be considered and included.

Site Allocation Policy 2: Land to the south of Alkham Valley Road / Land to the rear of The Meadows, Alkham

In total 8 representations were made on this policy by 8 consultees. Representations were received from:

Name	Organisation	Comment ID
Katie Miller	North Downs Way AONB	DLP1487
Nathan Burns	Kent and Sussex Natural England	DLP1437
Clerk	Alkham PC	DLP2053
Kelly Lawrence	Deal TC	DLP2108
Andrew Howard-Grigg	Temple Ewell PC	DLP2936
Derek Leach	The Dover Society	DLP3007
Alison Heine	Planning Consultant	DLP3267
Ms Sarah Gleave	Dover and Deal Green Party	DLP2807

3 respondents stated that they agreed with the policy and no respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Council's response
AONB unit - The site lies wholly within the AONB, on a sensitive site within the Alkham Dry Valley. Dry Valleys are	Comment noted

<p>recognised as one of the key characteristics of this local character area and are also identified as one of the special characteristics and qualities of the Kent Downs AONB as a whole, as identified in the Kent Downs AONB Management Plan as well as being one of the main targets for the AONB designation.</p>	
<p>AONB unit - The of increase in pitches proposed under this Policy would further detract from the landscape character of the locality and fail to conserve and enhance the natural beauty of the Kent Downs AONB.</p>	<p>Criteria b of the draft Policy requires a landscape scheme for the site which retains and improves vegetation along the site boundary and to mitigate the impact on the AONB.</p> <p>Criteria c of the draft Policy requires the positioning of hard standing and siting of pitches to be in a manner that minimises the visual impact on the AONB.</p>
<p>AONB unit - The allocation is considered to be contrary to policies SD1, SD3, SD8 and LLC1 of the Kent Downs AONB Management Plan. We would also refer you to the revised NPPF policy on AONBs which now requires AONBs to be enhanced as well as conserved and for development to be of limited in scale. Do not consider an increase in units in this highly sensitive rural location would comply with either of these stipulations.</p>	<p>Comment noted.</p> <p>The site has an already established Gypsy and Traveller use. It is considered that the additional pitches can be mitigated through criteria in the draft Policy</p>
<p>AONB unit - The Planning Policy for Traveller Sites, August 2015 confirms that local plans must be consistent with policies in the NPPF, including the presumption in favour of sustainable development and the application of specific policies in the Framework. This means that paragraph 172 of the NPPF is relevant. The AONB Unit therefore objects to the proposed policy.</p>	<p>Comment noted.</p> <p>It is considered that the site as part of the Councils strategy to meet Gypsy and Traveller need meets the aim of the Governments national policy approach for travellers.</p> <p>The site has an established use for Gypsy and Travellers. Further intensification of the site would be mitigated for through the criteria in the draft Policy.</p>
<p>Concern over flooding on the eastern end of the site.</p>	<p>The site is not in nationally identified flood zones 2 or 3</p>

Concern over ability of available space on the site to accommodate the additional pitches and transit pitches. Concern over what the Council considers a pitch to contain and average pitch sizes	The Councils approach to assessing the capacity on the site and what is considered a pitch is set out in the GTAA 2020 update. The approach is considered appropriate. The site has considerable areas of open space within its curtilage.
Concern that existing planting providing screening around the site has been removed	Comment noted. Criteria b of the draft Policy requires a landscape scheme for the site which retrains and improves vegetation along the site boundary and to mitigate the impact on the AONB
Concern over existing levels of hard standing on the site	Comment noted.
High risk of possible damage to the underground site culverts if the location is developed further.	Comment noted
There is no evidence of requirement as this is windfall site.	The Governments national policy for travellers PPTS 2015 requires Local Planning Authorities to identify specific deliverable and developable sites to meet the need for Gypsy and Travellers pitches. This approach is appropriate as it allows Local Authorities to consider and address cumulative planning issues, rather than an adhoc approach of windfall sites which in their nature are unknown until a planning application is submitted.

Council's Response – Proposed Changes

- The site has now been granted planning consent so will be removed as an allocation.

Representations relating to the promotion of sites

The table below sets out the representations received from site promoters relating to proposed Reg 18 Local Plan sites and the council's response.

Note that where the site remains in the Regulation 19 Local Plan, the new site policy reference (SAP) has been included with the site address for ease of reference.

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
DLP 1108	Land at Short Lane, Alkham (ALK003) (Reg 19 SAP43)	Messrs Barnes - Hobbs Parker	Hobbs Parker	<ul style="list-style-type: none"> The site is immediately available for development 6 dwellings are proposed to enable the provision of a landscape buffer within the site 	Minerals Assessment Transport Statement	Comments acknowledged. Assessments considered as part of the site's suitability
DLP 402	Land south of Mill Field, Ash (ASH003)	June House (Finns)	Jack Foat Trust	<ul style="list-style-type: none"> Support the allocation Site available, in a single ownership with Access. It is deliverable in the first 5 years of the Plan. Site benefits from better existing landscaped boundary treatment than the approved site directly adjacent and it is considered unreasonable to treat the two areas of land differently. The requirement for a landscape buffer of such a scale is to great and site capacity increased back to 15. 	None	Comments acknowledged. The site is now allocated in the 'made' Ash Neighbourhood Plan 2021
DLP 1409	Land adjacent to Saunders Lane, Ash (ASH010)	Joe O'Sullivan - AAH Planning	AAH Planning	<ul style="list-style-type: none"> Support the allocation. Transport Assessment produced for the Outline Planning Applications confirms that the site can be safely accessed. There are no major infrastructure or abnormal costs to affect the overall delivery of this site. The site is readily available, deliverable with a willing landowner 	None	Comments acknowledged. This site has gained planning permission.

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				and promoter to develop the site.		
DLP 2059	Land to the east of Great Cauldham Farm, Capel-le-Ferne (CAP006) (REG 19 SAP44)	Esme Sparrow	Quinn Estates	<ul style="list-style-type: none"> • Support the allocation • The site is available, suitable, and achievable. • The site should extend slightly to the north, to where existing residential dwellings extend out further to the west, and should accommodate 100 dwellings. • Transport note concludes the existing highways network around the Great Cauldham Lane allocation would have sufficient capacity for the increased the traffic and trip generations from a 200-dwelling development and therefore would have ample capacity for a proposed 100 home allocation. • The development would be set back from existing properties with a strong landscape buffer also proposed to screen the development from neighbouring homes. • The site is not considered to be reflective of the special qualities or characteristics of the AONB, nor would the 	Masterplan Landscape briefing note Transport note Archology note Site brochure	<p>Comments acknowledged. Assessments considered as part of the site's suitability.</p> <p>A landscape buffer within the site is considered appropriate to mitigate the impact of development on the setting of the AONB.</p> <p>Capel-Le-Ferne's settlement status is determined by the Local Plans Settlement Hierarchy. The hierarchy in determining a settlement position has robustly reviewed the levels of service provided within each settlement.</p>

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				<p>proposal bear any significant or detrimental impact on its setting.</p> <ul style="list-style-type: none"> • The first two wintering bird surveys have recorded very little bird interest at the site indicating the site is of low value to wintering birds. • There are no heritage assets on or near the site that would be directly affected by development. • Through the provision of 100 dwellings there is also the option to acquire land to enable Capel le Ferne Primary School to expand in the future. Consultation has been undertaken with KCC Education and the school, this consultation has confirmed the support to safeguard this land for the future expansion of the school. • 100-home scheme would allow for an increase of the provision of open space on the site, in the form of a linear greenway, defining the character of the development, with the potential for a community orchard within the open space to the north of the site for existing and new residents. 		

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				<ul style="list-style-type: none"> • Capel le Ferne should be reconsidered as a Local Centre due to a number of factors including the facilities and services it currently provides, its proximity to Dover and Folkestone and its sustainable transport links to these settlements and the potential for future development to support existing and new facilities in the village. 		
DLP 1620	Land off Cross Road, Deal (DEA008) (Reg19 SAP14)	Andrew Collis	Gladman	<ul style="list-style-type: none"> • Support allocation • Site is viable • The site could be sustainably developed without any unacceptable impacts on the natural or built environment. 	Preliminary Highways review	Comments acknowledged. Review considered as part of the site's suitability
DLP 1633	Land off Freeman's Way, Deal (DEA021)	Carl Thompson	Dunning Dale (Developer)	<ul style="list-style-type: none"> • Support the allocation. • There are no technical constraints to the development of the site. • Site is available for residential development, and represents an achievable and deliverable allocation given the implementable permission at the site. 	None	Comments acknowledged. This site now has planning permission and has been removed from the Local Plan
DLP 1155	Land adjoining 455 Folkestone Road, Dover	David West	Hobbs Parker	<ul style="list-style-type: none"> • Support the allocation. • Development to be complete by summer 2023. 	Landscape and visual impact assessment	Comments acknowledged. Review considered as part of the

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
	(DOV008) (Reg19 SAP13)				Badger survey Dormouse survey	site's suitability
DLP 1221	Dover Waterfront (DOV017) (Reg19 SAP6)	Jason Ransley	Dover Harbour Board	<ul style="list-style-type: none"> • Support the allocation • Site could accommodate a larger number of dwellings. 	Strategic Plan	Comments acknowledged. Strategic Plan considered as part of the site's suitability
DLP 1509	Land at Barwick Rd Industrial Estate, Coombe Valley, Dover (DOV022E) (Reg19 SAP9)	Dan Blake (DHA Planning)	Peters Properties	<ul style="list-style-type: none"> • Support the allocation. • Note that a Transport Assessment and Land Contamination Assessment are required on the site. • Concerns regarding the viability of the site for the development of a fully residential scheme due to issues of contamination. • Concerns that the level of required contributions will mean that it may not be viable to pursue a residential scheme over commercial re-uses. 	None	Comments acknowledged.
DLP 2315	Land at Buttsole Pond, Lower Street, Eastry (EAS002) (Reg19 SAP32)	David Bradley	Miller and Bradley	<ul style="list-style-type: none"> • Support the allocation. 	None	Comments acknowledged.

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
DLP 2315	Eastry Court Farm, (EAS009) (Reg19 SAP33)	David Bradley	Miller and Bradley	<ul style="list-style-type: none"> • Support the allocation, 	None	Comments acknowledged.
DLP 1691	Eastry Court Farm, (EAS009) (Reg19 SAP33)		Church Commissioners	<ul style="list-style-type: none"> • Support the allocation. • Owns the whole site. • Access details. • Site is immediately available for development. • Flexibility to increase capacity beyond 5 dwellings. 	Transport note	Comments acknowledged. Note considered as part of the site's suitability
DLP 1503	Land at Monkton Court Lane (EYT001) (Omitted from Reg 19)	Martin Hart	Managing Director Pentland Homes	<ul style="list-style-type: none"> • Support the allocation. • Acknowledge need for supporting evidence and will progress them as site moves towards submitting a planning application. 	None	Comments acknowledged. The site is covered by a surface water flow path which constrains development and has been removed from the Local Plan.
DLP 1016	Land on the south eastern side of Roman Way, Elvington (EYT008) (Reg 19 SAP29)	June House Finns	Richard Ledger	<ul style="list-style-type: none"> • Support the allocation • The land is available, in a single ownership and is deliverable in the first 5 years of the Plan. • can be accessed off Beech Drive, Secondary access, via Byway EE335 at the western corner of the site • opportunity to provide a new hedged boundary 	None	Comments acknowledged.

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				<p>along the north eastern edge which will benefit biodiversity</p> <ul style="list-style-type: none"> • Site can deliver up to 50 dwellings which delivers development at 30 dwellings per hectare 		
DLP 1275	Land adjacent to Short Street, Chillenden (GOO006) (Reg 19 SAP50)	Julian Fitzwalter	Goodstone Estate	<ul style="list-style-type: none"> • Support the allocation 	None	Comments acknowledged.
DLP 1618	Land to the east of Northbourne Road, Great Mongeham (GTM003) (Reg19 SAP16)	Hannah Haddad - Savills	Mr William Hickson	<ul style="list-style-type: none"> • Support the allocation. • Increase the area allocated on the site and facilitate the development of additional housing • Wider site is capable of delivering approximately 33 new dwellings sympathetically to wider environment. 	Masterplan Landscape appraisal Initial access appraisal Sketch design document	Comments acknowledged. Assessments considered as part of the site's suitability
DLP 1875	Connaughts Barracks, Dover (GUS002)	Ben Young Lee Evans	The Land Trust	<ul style="list-style-type: none"> • Concern with the downgrading of the Former Connaught Barracks site from a Strategic Allocation. • There is no longer any specific reference to Fort Burgoyne and no requirement for any development proposals to stabilise its condition, accommodate new uses if possible, agree a public access strategy 	None	<p>Comments acknowledged.</p> <p>Fort Burgoyne which is adjacent to the Connaught Barracks site will now have its own specific site</p>

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				<p>and incorporate a management arrangement that secures a sustainable future for the Fort.</p> <ul style="list-style-type: none"> • The entirety of the land now controlled by the Land Trust are still shown as falling within the site allocation, when it does not form part of the Connaught Barracks planning application and is not controlled by Homes England. • The Draft Local Plan therefore needs to provide clarification as to how the regeneration of these two separate elements, Connaught Barracks & Fort Burgoyne will be delivered to allow for proposals for Fort Burgoyne to be brought forward under a set of key objectives, independent of the Connaught Barracks housing development. 		<p>allocation policy in the Local Plan. The Policy will set out criteria for the viable reuse of the site that will conserve and enhance this heritage asset.</p> <p>The remaining balance of Connaught Barracks existing site allocation, gained outline planning consent in September 2021 and has been removed from the Local Plan.</p>
DLP 1410	Land at Woodhill Farm, Ringwould Road, Kingsdown (KIN002) (Reg 19 SAP34)	Sara Sweeney	Senior Planning and Development Manager Kitewood	<ul style="list-style-type: none"> • Support the allocation. 	Landscape and Visual Assessment Feasibility Indicative Masterplan Proposed site	Comments acknowledged. Assessments considered as part of the site's suitability

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
					access junction Speed survey November 2020	
DLP 2076	Land adjacent to Lydden Court Farm, Church Lane, Lydden (LYD003) (Reg19 SAP47)		Quinn Estates	<ul style="list-style-type: none"> • Support the allocation. • Site is better suited for 54 dwellings not 65. 	Masterplan Ecological appraisal Technical note to inform a Habitats Regulation Assessment Highways note Potential highway improvement scheme	<p>Comments acknowledged. Assessments considered as part of the site's suitability</p> <p>Final site capacity will be informed by a site-specific Flood Risk Assessment to address the issue of surface water flooding on the site.</p>
DLP 1160	Prima Windows, Easole Street/Sandwich Road, Nonington (NON006) (Reg 19 SAP52)		Roma Capital Group c/o Agent	<ul style="list-style-type: none"> • The developer is committed to bringing forward the site in the short term 	None	Comments acknowledged.
DLP 2057	Betteshanger Colliery, Betteshanger, Deal (NOR005)	Alex Kalorkoti	Quinn Estates Ltd	<ul style="list-style-type: none"> • Ongoing commitment to delivering the site for alternative use to employment 	None	Comments acknowledged. The site has gained

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
						planning permission and has been removed from the Local Plan.
DLP 2075	Site north of Discovery Drive, Preston (PRE016) (Reg19 SAP48)		Quinn Estates Ltd	<ul style="list-style-type: none"> • Support the allocation. • The site is suitable, available now and achievable. • The site can come forward irrespective of the adjoining proposed allocations at Appletree Farm due to its contained nature and separate access. 	Masterplan Transport note	Comments acknowledged. Assessments considered as part of the site's suitability
DLP 490, DLP 1144	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich (SAN008) (Reg19 SAP20)	John Elvidge	John Elvidge Planning Consultancy	<ul style="list-style-type: none"> • A heritage assessment, and an archaeological desk-based assessment, can be provided. • Allocation of the site is not considered to lead to an unacceptable impact on highway safety, nor is it considered that residual cumulative impacts on the road network would be severe. 	TRICS analysis	Comments acknowledged. Analysis considered as part of the site's suitability
DLP 856	Land adjacent to Sandwich Technology School, Deal Road, Sandwich (SAN013) (Reg19 SAP21)	John Bean	Site promoter	<ul style="list-style-type: none"> • Support the allocation. • Object to the use of part of the site for the expansion of Sandwich Sports and Leisure Centre. • The Leisure Centre is now incorporated into and operated by the school, which has sufficient land to 	None	Comments acknowledged. The draft Indoor Sport and Leisure Facility Strategy (2022) does not identify a need for expansion of

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
				<p>accommodate its expansion if this is required.</p> <ul style="list-style-type: none"> • The site is better suited to accommodate an entirely residential scheme. • it is suggested a more reasonable figure for provision would be up to 85 dwellings. • A drainage ditch crosses the site creating opportunities for green open space 		<p>the Sports and Leisure centre and subsequently the requirement will be reviewed.</p> <p>KCC education, and the school themselves have identified a need for school expansion as the site is already undersized for the form entry (FE) it provides. Due to the location of the site adjacent to an existing school, it is the most appropriate site to enable expansion of the school.</p> <p>The final capacity of the site will need to be informed by: a site-specific flood risk</p>

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
						assessment, incorporate design of the drainage ditch, and the land needed once school expansion has been finalised.
DLP 1617	Land at Archers Low Farm, St George's Road, Sandwich (SAN023) (Reg19 SAP22)		Fernham Homes Ltd	<ul style="list-style-type: none"> • Support the allocation. • Planning application and supporting documentation submitted. • Site capacity should be increased to 52 from 40 as demonstrated through the planning application. 	None	<p>Comments acknowledged. The 40 dwelling capacity was set to protect many of the trees on site.</p> <p>The planning application for 52 dwellings was refused, on amongst other matter due to the loss of a significant number of trees, encroachment into the Root Protection Area of a retained tree.</p> <p>Many of the trees proposed for felling are the subject of</p>

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
						Tree Preservation Orders, they provide an important contribution to the character of the area, the beauty of the countryside and the sensitive landscape setting of this part of Sandwich.
DLP 2710	Land to the north and east of St Andrew's Gardens, Shepherdswell (SHE004) (Reg19 SAP36)	Mike West	Consultant for landowner	<ul style="list-style-type: none"> • Site is immediately available for development, • Developer interest 	Transport assessment Feasibility Assessment	Comments acknowledged. Assessments considered as part of the site's suitability
DLP 2860, 2861	Land to the north and east of St Andrew's Gardens, Shepherdswell (SHE004) (Reg19 SAP36)	Mike Goddard	Consultant for landowner	<ul style="list-style-type: none"> • Consider that the proposals would be acceptable in highway safety terms. 	None	Comments acknowledged.
DLP 1692	Land at Botolph Street Farm, Shepherdswell	Church Commissioners	Landowners	<ul style="list-style-type: none"> • Owns the full extent of the sites and they are both considered to be suitable and available 	Transport appraisal	Comments acknowledged. Appraisal considered

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
	ell (SHE006) (Reg19 SAP37)			<ul style="list-style-type: none"> Request that the policy allocation of 20 units is indicative on the basis that a masterplan has not yet been produced. 		as part of the site's suitability.
DLP 1252	Land at South West of Sandwich Road, Sholden, Deal (SHO002)	Nick Banks	Richborough Estates Limited	<ul style="list-style-type: none"> Support the allocation The wider land which is under landowners' control is also suitable for development and should be included as part of larger allocation for 250 dwellings. 	Highways impact assessment Landscape & visual technical note Site assessment Technical note	<p>Comments acknowledged. Appraisal considered as part of the site's suitability.</p> <p>The site now has planning permission and has been removed from the Local Plan.</p>
DLP 3449	Land at Durlock Road, Staple (STA004) (Reg19 SAP54)	David Parfitt	Land owner	<ul style="list-style-type: none"> Comment on mineral assessment. 	None	Comments acknowledged.
DLP 651	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way (STM003) (Reg19 SAP38)	Mr James Mitchell	Site promoter	<ul style="list-style-type: none"> Support the allocation Aware of the need to provide a Land Visual Impact Assessment, transport and contamination assessment before Regulation 19 consultation 	None	Comments acknowledged.

Res pon se ID	Site address	Responde nt	Organi s- ation	Comments summary	Additio nal informa tion/Do cument s	Council Response
DLP 361 3	Land to the west of Townsend Farm Road, St Margarets (Site B) (STM007) (Reg19 SAP39)	Karen Banks	Planni ng Consul tant	<ul style="list-style-type: none"> • No general comments 	Landsca pe and Visual Apprais al	Assessments considered as part of the site's suitability
DLP 111 1	Land to the west of Townsend Farm Road, St Margarets (Site B) (STM007) (Reg19 SAP39)	N Claringbou ld	RC Claring bould and Sons	<ul style="list-style-type: none"> • Support the allocation, in association with Site STM008 • The site remains available and developable with development achievable within the first period of the Plan. 	None	Comments acknowledged.
DLP 361 3	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A) (STM008) (Reg19 SAP39)	Mrs Karen Banks	Planni ng consul tant	<ul style="list-style-type: none"> • No general comments 	Landsca pe and Visual Apprais al	Appraisals considered as part of the site's suitability
DLP 111 1	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A) (STM008)	Mr N Claringbou ld	RC Claring bould and Sons	<ul style="list-style-type: none"> • Site should be delivered with STM007. 	None	Comments acknowledged.

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
	(Reg19 SAP39)					
DLP 74	Land adjacent to White Lodge, Preston Hill (WIN004) (Reg19 SAP42)	Mr Richard Stevens	Site promoter	<ul style="list-style-type: none"> • Support the allocation. • Comments on site accessibility. 	None	Comments acknowledged.
DLP 1689	Footpath Field, Staple Road, Wingham, (WIN014) (Reg19 SAP41)	Rachel Allwood	Wingham Heritage Site promoter	<ul style="list-style-type: none"> • Support the allocation. • Amend policy to provide a range of dwellings for the site 	Wintering Bird Survey Ecological Impact Assessment Air Quality Assessment Landscape Statement Transport Technical Constraints & Opportunities Plan	Comments acknowledged. Assessment considered as part of the site's suitability
DLP 1277	Beacon Lane Nursery, Beacon Lane, Woodnesborough (WOO005)	Jonathan Vickers	P W Vickers & Son - site promoter	<ul style="list-style-type: none"> • Support the allocation • Site provides a suitable re-use of a previously developed site in a logical in-fill development • The site has no insurmountable 	KCC Minerals Assessment	Comments acknowledged. Assessment considered as part of the site's suitability

Response ID	Site address	Respondent	Organisation	Comments summary	Additional information/Documents	Council Response
	(Reg19 SAP55)			environmental or technical constraints		
DLP 371	Land to the east of Jubilee Road (WOR006) (Reg19 SAP49)	John Stevens	Finns	<ul style="list-style-type: none"> • Support the allocation. • The land is available and in a single ownership. • Access can be provided • Requesting amber parcel of the site adjacent be included within the allocation. FRA carried out on the amber site. 	Flood Risk Site Assessment	Comments acknowledged. Assessment considered as part of the site's suitability.
DLP 1631	Land to the East of former Bisley Nursery, The Street, Worth (WOR009) (Reg19 SAP49)	Carl Thomason	Sunning Dale	<ul style="list-style-type: none"> • Support the allocation. • Accepted that any forthcoming application will need to be supported by a Heritage Assessment, it is considered that there is sufficient space on-site and separation to ensure there will be no harmful heritage impacts resulting from the development. • There are no other policy or technical constraints affecting the development of the site. 	None	Comments acknowledged.

Sites Removed since Regulation 18:

Following the detailed assessment following regulation 18 stage, the following sites have been removed as potential allocations:

- SP5 (AYL004) – North Aylesham. The site was proposed for 500 homes. It has been removed due to concerns in relation to the cumulative impact upon the highways network and significant objections to the scale of development proposed in Aylesham at Regulation 18 stage.
- DOV012 – Former Channel Tunnel Workers Accommodation, Farthingloe. The site was proposed for 100 homes, but has been removed due to objections from AONB unit and Natural England, and no clear mitigation or justification has been provided for major development in the AONB.

- DOV025 - Land off Wycherley Crescent, Dover. The site was proposed for 10 homes. (Previous Local Plan allocation). The site is a designated Local Wildlife Site and has been removed as its impact cannot be mitigated.
- EAS012 – Lower Gore Field, Eastry. The site was proposed for 35 homes, but is no longer available for housing.
- EYT019 – Land to east of Adelaide Road, Eythorne. The site was proposed for 6 homes. It has been removed as it will form part of the access to the strategic allocation in Elvington.
- SHE003 - Land to the north of Westcourt Lane, Shepherdswell. The site was proposed for 100 homes and is removed due to highway safety concerns raised by KCC highways, and significant objections at Regulation 18 stage.
- WHI006 – Former Guide Hut, Whitfield. The site was proposed for 10 homes and is removed as is no longer available for housing.
- EYT001 – Land at Monkton Court Lane. Site was proposed for 20 units. The site is covered by a surface water flow path which constrains development here so has been removed.

The following sites have also been removed as they are now subject to planning permission or have a resolution to grant. (Note the units listed below were the Reg 18 proposed allocation – this may not be the same number which has since obtained planning approval).

- AYL002 Land at the Boulevard, Aylesham (17 units)
- DEA020 Land off Cross Road, Deal (100 units)
- DOV009 Land at Stanhope Road, Dover (32 units)
- SHO004 Land adjoining Pegasus, Sandwich Road, Sholden (42 units)
- NOR005 Betteshanger Colliery, Deal (210 units)
- GUS002 Connaught Barracks, Dover (300 units)
- ASH010 Land adjacent to Saunders Lane, Ash (76 units)
- DEA018 Church Lane/Hyton Drive, Deal (18 units)
- DEA021 Land off Freeman's Way, Deal (88 units)
- SAN015 Kumor Nursery, Sandwich (67 units)
- SHO002 Land to South West of Sandwich Road, Sholden, Deal (110 units)

All the site allocations in Ash have been removed from Regulation 19 Local Plan as they are covered by the adopted Ash Neighbourhood Plan (ASH003, ASH004, ASH011, ASH014 and ASH015).

DM Policy 10: Gypsy and Traveller Site Intensification (Reg 19 - H3 - Meeting the needs of Gypsies and Travellers)

In total 11 representations were made on this policy by 11 consultees. Representations were received from:

Name	Organisation	Comment ID
Anonymous		DLP1488
Nathan Burns	Natural England (Kent and Sussex)	DLP1443

Sara Gomes	Environment Agency	DLP1554
Mr Simon Webb		DLP707
Council Clerk	Alkham Parish Council	DLP2056
Kelly Lawrence	Deal Town Council	DLP2109
Anna Evans		DLP2528
Douglas Smith		DLP2762
Ms Sarah Gleave	Dover and Deal Green Party	DLP2808
Derek Leach	Dover Society	DLP3008
Alison Heine	Planning Consultant	DLP3270

1 respondent stated that they agreed with the policy and 4 respondents stated that they objected to a site within the policy.

Summary of Representations – Main Issues

Summary of Representations	Council's response
Romany Acres - within the AONB the existing site fails to either conserve or enhance the AONB, concerns that an intensification of the site would exacerbate existing harm. Does the site have sufficient space to accommodate an additional 4 pitches? Current poor state of the site. There is already adequate provisions for the travelling community in the area. Significant problems with traffic which will be greatly exacerbated by additional development. Proposed intensification will have unacceptable impacts on the character, appearance, and visual amenity of the locality.	Romany Acres is an established site that counts towards existing provision of pitches within the district. The available land that has not already been developed for the existing pitch on the site has been assessed as having capacity for 4 further pitches. Development of this land has the potential to improve on the storage use that is currently there, improving the sites impact on the surrounding countryside.
There is no evidence of requirement for pitches.	The evidence of pitch need is set out within the Councils GTAA evidence base.
No new Gypsy and traveller sites should be placed in FZ3 as they would count as a permanent home and will be classified as highly vulnerable under NPPF.	Comment noted.

The principle of making good use of existing sites accords with Chapter 11 NPPF	Comment noted.
For clarity policy should indicate the total number of pitches to be permitted on named sites not just the number of additional pitches.	It is considered unnecessary to include existing pitches within the policy as this information can be found within the GTAA evidence base.
Policy should make clear what is meant by a pitch and how large a standard pitch should be.	There is no definition of what a pitch should contain or what size it should be in national Policy. What the Council considers generally a pitch should be is set out within the GTAA evidence base as part of assessing capacity on sites for intensification. However when considering additional pitches on a site it is appropriate to consider existing design and densities.
Concern that pitches maybe changed to residential use at a later date.	Comment noted.

Summary of Proposed changes

- A new policy is proposed to safeguard the loss of existing and new pitches to other uses.
- No changes are proposed to how this policy is set out, however new sites may be added as a result of the Councils recent targeted call for sites exercise.
- Policy will be updated to include detailed assessment criteria in accordance with PPTS, such as impact on landscape and neighbouring uses.

DM Policy 11: Type and Mix of Housing (Reg 19 – Policy H1)

In total 12 representations were made on this policy by 12 consultees.

Representations were received from:

Name	Organisation	Comment ID
Chris Shaw		DLP1213
Keith Heaven		DLP1371
Seb Willett	Langdon Parish Council	DLP1244
Alex Child Planning Bureau	The Retirement Consortium	DLP1685
Chris Moore	Plainview	DLP1927
Emily Penkett	Plainview	DLP1961

Kelly Lawrence	Deal Town Council	DLP2110
Ian Williams		DLP2234
Ms Sarah Gleave	Dover and Deal Green Party	DLP2809
Derek Leach	The Dover Society	DLP3009
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3330
Julie Davies	CPRE	DLP3715

4 respondents stated that they agreed with the policy and 5 respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
Support for no affordable housing in Dover urban	Comment noted
Policy does not appear to address a growing trend of standalone older person housing need	In identifying the Districts need for types and mix of housing the SHMA uses ONS data which amongst other matters considers the average size of households per dwelling.
There is no reference to Section 106 contributions where the affordable housing requirements cannot be met.	The issues of affordable housing provision is addressed within policy DM12.
Sandwich there is a need for smaller homes for older residents who want to downsize.	Comment noted
Cost of new housing in Sandwich and the inability of young persons in the town to afford them.	Comment noted
The policy should ensure that an appropriate mix of dwellings can be achieved on all sites, even those under 9 dwellings.	As sites get smaller it can become increasingly harder to provide a range of dwellings to meet the identified need for type and mix.
Windfall sites may potentially end up providing dwelling types and sizes that are not in keeping with a local settlement vernacular.	Windfall sites of 10 or more dwellings will be required to meet the Criteria of the Policy. Consideration of dwelling design is set out within the Local Plans design policies.

Opposed to nil provision of affordable housing in Dover urban	Comment noted. The evidence supporting a position of now requirement for Affordable housing is covered within the Whole Plan viability Assessment.
Support for the provision of older persons housing.	Comment noted.
The policy should require the most robust level of evidence to permit departure from the requirement to meet local need affordability and accessibility housing	Comment noted.
The very low Housing with Care (also known or Extra Care) requirement is surprising as generally there is a high level of need for such accommodation	Comment noted.
Concern over the provision of care for older persons and provision in the Local Plan	The evidence and requirement for older persons housing and register care is set out within the Councils SHMA. The SHMA prescribes a need for 576 units for older people and 66 units of housing with care and 990 additional spaces for registered care housing for those aged 65 and over between 2020 and 2040. Policy DM11 sets out that the provision of need as set out within the SHMA will be monitored through the Councils Authority monitoring report (AMR) and considered when new housing proposals are submitted.
The growth of generation rent must be considered, persons simply being priced out of the market due to lack of provision;	The SHMA considers housing need based on projected household growth with an affordability element increasing the housing need factored on top.
All efforts must be made to boost the provision of housing which will in turn allow greater affordability and access onto the housing ladder.	Comment noted
There appear to be some inconsistencies between conclusions made in the SHMA 2019 update using 2011 census data, and the available statistics on housing need provided by	Figure 6.1 in the Regulation 18 document is based on data from the SHMA 2019 update. The SHMA update considered the latest housing need for the district based on the Government ONS 2014 projections

ONS 2016 data which I believe is the basis for figure 6.1.	which is in line with the standard method for calculating local housing need.
ONS information is now 5 years out of date and would no doubt result now in lower overall growth forecasts;	The Councils SHMA is considered the most robust approach to identifying the housing needs for the District. The SHMA uses the most appropriate available up to date data to determine the type and mix of housing required within the District over the Plan period.
No details provided on how Council housing stock is considered	The SHMA considers the existing stock of housing, household sizes, types of household and age demographics of the district and projects the future need and types of housing for the Plan period.
Concern on how the Plan relies on the patchy record of commercial builders to provide for affordable housing needs under the weak provision of S106 contributions.	The issues of affordable housing provision is addressed within policy DM12.
No assessment of potential for conversion of commercial buildings to housing.	It is considered that the likely conversion of office and retail units will be small below the 10 units threshold of the policy.
The plan should also consider how existing homes are used.	The SHMA considers the existing stock of housing, household sizes, types of household and age demographics of the district and projects the future need and types of housing for the Plan period.
The plan should include a study to assess the level of under-occupation in the district and then map out the need for purpose-built retirement housing.	The SHMA considers the existing stock of housing, household sizes, types of household and age demographics of the district and projects the future need and types of housing for the Plan period.
The plan should include such provision on infill and marginal sites.	This matter is addressed in the SP3 Residential windfall development
Langdon Parish Council - Any proposed housing allocation and	Planning application on sites of 10 or more dwellings will be required to

design must assess and address the need for a range of potential residents both in age and affordability if the population profile of the parish is to encourage a younger influx of buyers as well as an offering older generation of downsize and remain on the village community.	provide a mix and type of housing to meet the projected needs in the SHMA for the district. Specific location considerations would be addressed at the planning application stage and would need to evidence a deviation from the need for dwellings as set out in the SHMA.
Where do residential care homes fit into the plan? There used to be about five in Sandwich and now there are none.	Comment noted

Summary of proposed changes:

There are no proposed changes to Policy DM11. The purpose of the policy is to set out that any application for new dwellings on sites of 10 or more dwellings should be consistent with the type and mix of housing identified within the latest Strategic Housing Market Assessment (SHMA). Where the requirements of the SHMA can not be met then applicant would have to justify any departure.

DM Policy 12: Affordable Housing (Reg 19 Policy SP5)

In total 28 representations were made on this policy by 25 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Peter Wynn	Homes England	DLP284
Dr Sharon Danby		DLP628, DLP629, DLP630
Keith Heaven		DLP684
Ms Christine Haggart	Ash Parish Council	DLP1265
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1884
Katie Miller	Kent Downs AONB	DLP1489
Cllr Edward Biggs	DDC Ward Councillor DDC Ward - Town and Castle	DLP1988
Seb Willett	Langdon Parish Council	DLP1245
Jason Ransley	Dover Harbour Board	DLP1223
Mrs Christine Oliver		DLP1352
Dover Town Council DTC		DLP1168
Alice Young-Lee	Church Commissioners	DLP1697
Cllr Pamela Brivio	DDC Ward Councillor DDC Ward - Tower Hamlets	DLP1802

Derek Leach	Chairman The Dover Society The Dover Society	DLP3010
Ms Sarah Gleave	Dover and Deal Green Party	DLP2810, DLP2742
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3331
Barbara Cooper	Kent County Council	DLP1728
Mike Eddy	Walmer Parish Council	DLP1998
Kelly Lawrence	Deal Town Council	DLP2111
Sonja Watsham	East Kent Climate Action	DLP2569
	Danescroft Land Limited	DLP3632
	Persimmon Homes	DLP3625
Mr Ross Miller	Masterton Robin Designs Ltd	DLP121
Julie Davies	CPRE	DLP3716
Martin Hart	Pentland Homes	DLP3619

4 respondents stated that they agreed with the policy, 12 respondents stated that they objected to the policy and 12 respondents neither agreed nor objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Comments of Support for the Policy	
Dover Harbour Board - We support the exception of the Dover Urban Area from the requirement under DM Policy 12 Affordable Housing to provide affordable housing on schemes of 10 dwellings or more.	Comment noted.
Homes England support the affordable housing proposal.	Comment noted.
Deal Town Council supports this policy.	Comment noted.
The AONB Unit supports the lower threshold in designated rural areas which includes the AONB. The lack of affordable or rented housing within the AONB is recognised in the Kent Downs AONB Management Plan, and the provision of suitable provision of affordable housing supported by policy VC3 of the Kent Downs AONB Management Plan.	Comment noted. Cross reference to the AONB Management Plan will be included in the supporting text.
The Parish Council (St Margarets) can welcome the statement in paragraph one of DM12 that any development of greater than 6 dwellings should incorporate 30% affordable housing.	Comment noted.
A greater delivery of affordable homes is anticipated, appropriately balanced spatially across the district via both strategic and non-strategic sites and consistently across the plan period. We support this objective.	Comment noted.

Support approach where a site is sub divided and understand the desire for delivery on site.	Comment noted.
Dover Urban Area – No requirement for Affordable Housing	
Do not agree that it is not viable to provide affordable housing in Dover.	It is not proposed to amend the policy as it is based on the evidence provided within the viability study. This does not prevent affordable housing providers from delivering affordable housing schemes within the Dover Urban Area where they are viable – the policy just does not require it. This will be made clear in supporting text.
Developers must invest more in affordable housing in and around Dover.	
Dover has the best infrastructure to support communities and needs affordable housing.	
The strategy within Dover where affordable housing is desperately needed is to have NIL? This makes no sense! In all other areas it is set at 30% which shows that the LDP is developer led.	
The proposal under DM12 that Dover Urban Area applications should be exempt from the provision of this policy is unacceptable. Essentially, the Council is saying that Dover is too poor to merit any further affordable or social housing, even though the existing housing stock in Dover is generally of a low standard of construction.	
Take out with the exception of Dover Urban Area from the policy, there should be an affordable housing target for Dover Urban Area.	
Viability	
The Viability Study is not considered appropriate in its findings.	The study is based on evidence which the council considers to be appropriate.
The policy should attribute a clearer hierarchy to the options suggested. Off-site provision and deferred contributions are not a preferred approach and should not be condoned, much less encouraged by this policy. Any site which seeks to reduce or defer requirement should be seen by Planning Committee. If the total number of sites being called in under this condition becomes excessive, it will highlight that the district affordable housing provision is not being adequately met.	It is expected that the options listed in part 2 of the policy would be taken in sequence from a-e. The supporting text will be updated to reflect this. The policy needs to include criteria in order to provide some flexibility if a viability assessment can prove there are issues.
Tenure Split	
Like the majority of East Kent local authorities, Dover's affordable housing provision is set at what is considered the lowest acceptable proportion. This is acceptable in principle, but must be better supported by a more diverse tenure split; the range of affordable housing typologies set out in the NPPF should be restated and then fully encouraged. This should	The tenure split is evidence based in accordance with the Strategic Housing Market Assessment and the Whole Study Viability Assessment and the policy allows for some flexibility subject to a robust viability assessment. The

<p>include First Homes, which are a welcome alternative to managed properties, and could be a particularly attractive way of providing reduced cost housing in rural locations where the vernacular dwelling size/type does not suit affordable rent. Shared ownership remains an attractive model and is fully supported.</p>	<p>updated policy will also need to include provision for First Homes following the First Homes Written Ministerial Statement of 24 May 2021 and need to account for at least 25% of all affordable housing delivered by developers through planning obligations. Further evidence will be produced to support the redraft of the policy on this basis.</p>
<p>A split of 30% social rent 35% affordable rent and 35% affordable home ownership should be considered instead. Social rent homes are more likely to meet the needs of people on low incomes.</p>	<p>Social rent and affordable rent have been considered in the SHMA and the Viability Study in combination. Further evidence on the mix required will be made following the WMS in May 2021 on First Homes and the policy will be amended to reflect identified needs and government tenure requirements.</p>
<p>The split of 65% rentable and 35% ownership complies with the NPPF but would not necessarily match a local needs survey. In 2011 an independent housing need survey of the village (St Margarets) identified a demand for up to 39 affordable homes, potentially higher, but there is no land available within the settlement boundaries. This would be a problem if the Parish Council (St Margarets) took advantage of the potential 25 affordable dwellings delivered from the four site allocations. A further problem is that this type of affordable housing could come outside any Parish Council control and might not benefit local residents. Therefore the Parish Council might generally favour provision of affordable housing under Policy DM13 than DM 12.</p>	<p>The % requirements are evidenced from the SHMA, rather than the NPPF. Local Needs Surveys would be a material consideration in decision making, in combination with the policy and the district wide SHMA. Where local needs are identified, policy DM13 would be the appropriate policy to bring forward those proposals.</p>
<p>Uncertain how the policy will be implemented where the numbers as a result of the percentage split are not whole integers?</p>	<p>A rounding up or down exercise would usually be done in agreement with the developer during the planning process to come to a tenure split which provides whole unit numbers.</p>
<p>Will monies be required and used to provide affordable housing elsewhere? Concerned that</p>	<p>The policy states that for any financial contribution in lieu of provision on site, that</p>

<p>this may result in reduced affordable housing provision in rural areas.</p>	<p>equivalent provision of affordable housing is made off site. This will be dealt with on a case by case basis in terms of where the equivalent provision is made.</p>
<p>Other Comments</p>	
<p>There is a need for genuinely affordable housing in Sandwich, that local young people can buy or rent to be able to stay in the town. "Affordable" is a weasel word. It means what the user wants it to mean. If the developers plead poverty and tell DDC that they can't afford to build the cheaper homes, DDC will roll over and let them off.</p>	<p>The SHMA has evidenced the affordable housing need across the district, which includes Sandwich. The definitions of Affordable housing are set out within the NPPF. The policy sets out that independently verified viability evidence would need to be submitted to prove a developers viability position.</p>
<p>I would say that Local Parish Councils should have a role in identifying the extent and type of affordable housing and an integral role in developing the scheme.</p>	<p>Parish Councils can commission Housing Need Surveys in their parishes to get an up to date position on the specific housing need in their parishes.</p>
<p>Reading Borough Council's local plan requires affordable housing contributions from all housing developments. This is despite the National Planning Policy Framework (NPPF) stating small sites should not face demands for such contributions either on site or in kind. Reading had successfully argued that the shortage of affordable homes and the high cost of market housing justified a departure from the NPPF.</p>	<p>Each authority needs to take its own evidenced based approach, as set out within the NPPF.</p>
<p>The County Council set up an Affordable Housing Select Committee in 2019 to determine whether KCC can play a greater role in maximising the development of affordable housing in Kent, the select committee report sets out a range of recommendations. We welcome continued engagement with DDC. The County Council recognises that the delivery of affordable housing can impact the viability of a project and this policy includes flexibility to adapt to viability challenges which may occur. It is noted there is the potential for deferred contributions, it will be important that does not conflict with SP13. The County Council would welcome clarity as to what contributions may be deferred if this policy is applied, to ensure there is no impact on the</p>	<p>In terms of clarification of deferred contributions, these would just relate under this policy to affordable housing contributions in this policy. The overall infrastructure contributions policy will be reviewed as to deferred contributions for other types of infrastructure.</p>

<p>delivery of necessary infrastructure to support development.</p>	
<p>Suggested amendments to the policy</p>	
<p>Clause 2 - the objection is to off-site contributions or no provision of affordable housing. As this only relates to developments of 10 or more (or 6 in designated rural areas) it allows developers to avoid helping to meet the obvious need for affordable housing. Suggested change – Delete clause 2.</p>	<p>The policy allows for criteria should a viability assessment highlight any difficulties with provision on site, but it is likely this criteria would only be used in exceptional circumstances.</p>
<p>Suggest addition to Section 2 after Criteria c Provision of land for affordable housing to Parish Council in lieu of affordable housing provision on site.</p>	<p>This could be a consideration on a case by case basis, working together with the housing department, but the policy lists the main possible options. It is considered the scenario proposed would not be a regular occurrence and the flexibility of the policy would allow those discussions to take place.</p>
<p>DM Policy 12 should use the number of proposed units as a trigger for the provision of affordable housing, instead of the size of the site. This approach is in accordance with Paragraph 63 of the NPPF which states "Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer)." Eastry Court Farm is 0.84 ha and under the draft policy would trigger the need for the provision of affordable housing even though it is only allocated for at least five units</p>	<p>The NPPF states a major site as 10 dwellings or more or 0.5ha or more. The policy is currently in accordance with the NPPF.</p> <p>However, if the requirement would make the scheme unviable, then part 2 of the policy would be implemented.</p>
<p>Part 2 should be amended to say "If an approved development project is demonstrated to be not financially viable, then any permission should be revoked".</p>	<p>The policy is worded to allow for some level of flexibility if a robust viability assessment demonstrates there are evidenced issues on a particular site, so it is not considered to be appropriate to amend the wording to revoke a planning permission if there are viability issues, this would lead to a reduction in overall housing delivery in areas</p>

	where there is an identified need.
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Summary of Proposed Changes

- The Affordable Housing policy will become a Strategic policy
- The policy will be amended to reflect the First Homes requirements set out in WMS and PPG. Work will be undertaken on the SHMA/viability assessment to reflect the requirement and this will alter the current % requirements for each tenure
- The rented tenure will be amended to reflect affordable and social rented options
- The supporting text/implementation section will be updated to make clear that AH products can come forward in Dover through other avenues such as Social rent / or council / other investment.
- Supporting text will be updated to reflect the status/priority of bullets in part 2 which list options to be explored if viability position is agreed by the council, including the deferred contributions element.
- Supporting text will include cross reference to the Kent Downs AONB management Plan

DM Policy 13: Rural Local Needs Housing (Reg 19 Policy H2)

In total 16 representations were made on this policy by 16 consultees.

Representations were received from:

Name	Organisation	Comment ID
Tessa O'Sullivan		DLP75
Ms Alison Thompson	English Rural	DLP154
Mr Martin Brandon		DLP1331
Derek Leach	The Dover Society	DLP3011
Jane Cook	St Margarets-at-Cliffe PC	DLP1885
Mrs Susan Sullivan		DLP2666
Kelly Lawrence	Deal TC	DLP2112
Ms Sarah Gleave	Dover and Deal Green PArty	DLP2811
Katie Miller	Kent Downs AONB	DLP1490
Duanne Poppe	Ringwould with Kingsdown PC	DLP1839
Julie Davies	CPRE	DLP3717
Mike Eddy	Walmer PC	DLP1999
Barbara Cooper	Kent CC	DLP1729

Pamela Brivio	DDC Councillor	DLP1800
Ms Marnie Caton	Sandwich Environment Conservation Group	DLP3332
Seb Willet	Langdon PC	DLP1247

3 respondents stated that they agreed with the policy and 5 respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
Concern that affordable housing that would be provided on an allocated site is unlikely to provide for identified local need of have any local protections or local connection criteria.	Criteria c of the Policy requires that any proposed scheme take account of the affordable housing already planned in a parish or area, the criteria is not restrictive in nature where a local need is not being met by any proposed affordable housing but requires existing affordable housing provision as set out in the Local Plan be considered first proposing any scheme for local housing need.
English Rural is concerned that this revision of Policy DM6 is diluting the aim of local needs housing on a Rural Exception Site (RES) by stating in c. that affordable homes being provided on allocated sites be considered first. The affordable homes quota on S106 sites will not prioritise these homes for local people in perpetuity. Priority for such homes will then be allocated to those in the highest need on the DDC housing register. Similarly such sites do not prevent the right to buy and right to acquire in the same way a RES does. In low value areas such as Dover it is very difficult to deliver quality, energy efficient, well designed and constructed homes without some form of cross subsidy	The Policy sets out the requirements for a robust viability assessment where cross market subsidy is required, and this approach is considered appropriate.
Concerns that design of Rural Local Needs Housing will not be as high as other types of housing provision and their rural nature will worsen climate change	Any site will still need to be assessed against design and climate change policies adopted at that time. Further Criteria d sets out that schemes are to be well designed, appropriate in scale, layout and materials to the character

	and appearance of an area and of nearby settlements.
<p>St Margaret's at Cliffe PC - In 2011 an independent housing need survey of the village identified a demand for up to 39 affordable homes. As house prices have risen sharply since that date it is probable that the local need is now higher. Therefore this is a serious issue for the Parish Council. The problem here, as in many rural locations, is that there is no land available within the settlement boundaries to provide for this amount of housing. Affordable housing would come outside any Parish Council control and might not benefit local residents. We suggest that an additional option could allow a landowner or developer to offer a proportion of land on an allocated site (or other land within the Parish) to the Parish Council in lieu of actual housing. This would enable the Parish Council to have its own affordable housing project. If the amount and location of land allocated for this is agreed by the Parish Council the landowner/developer could be released from the 30% requirement for the subsequent building project. DM13 Rural Local needs Housing suggest this addition to Criteria d "The Parish Council to determine eligibility of applicants for DM Policy 13 affordable housing within the parish and in compliance with Section 106 Agreements"</p>	<p>Comment noted.</p> <p>The type of housing scheme, where and for whom would be part of determining whether there is a Local Housing need in an area not being met by any planned affordable housing provision.</p>
<p>Dover and Deal Green party request the addition of wording: The work of Kent Community Housing Hub which provides a genuine alternative to developer-led housing schemes designed for high profit, will be brought to the attention of all of the District's parish and town councils, as will the initiative of Shepherdsweil and Coldred Community Land Trust'</p>	<p>It is not appropriate for wording to be added to the Local Plan that may create favour or promote a private organisation or business.</p>

The AONB Unit supports the policy but questions why there is no locational criteria. And suggest a criterion similar to DM Policy 14 b) would be appropriate.	Comment noted
The policy would benefit from an additional criterion that the development can access nearby services and facilities by active travel modes on safe routes.	Comment noted
Clarity on how the information necessary for parish councils to carry out meaningful rural housing needs assessments will be made available to the parish councils.	Comment noted
KCC would welcome a link between this policy and the need for the Local Plan to support sustainable rural transport initiatives to reduce the reliance on private vehicles.	Comment noted
Policy DM 13 be extended to include two identified areas of additional need: bespoke retirement housing both within villages and urban areas, and bespoke custom self-built housing that is meeting a specific need.	The type and mix of housing as addressed within DM Policy 11 and Self Build within DM Policy 15

Summary of Proposed changes

- Consider adding into the policy “site is accessible to schools, health and local services including public transport or actively seek to provide sustainable rural transport initiatives”. This wording will enable consideration of the issues of sustainable development in RES.
- Consider setting out in the supporting text what the Council consider the framework or base elements of a local housing need survey to be and level of support to be provided by the Council.

DM Policy 14: Gypsy and Traveller Windfall Accommodation (Reg 19 Policy H4)

In total 5 representations were made on this policy by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
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Ms Christine Haggart	Ash PC	DLP1185
Kelly Lawrence	Deal TC	DLP2113
Ms Sarah Gleave	Dover and Deal Green Party	DLP2812
Alison Heine	Planning consultant	DLP3271
Derek Leach	The Dover Society	DLP3012

2 respondents stated that they agreed with the policy and 2 respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
Are the sites proposed sustainable in terms of walking distance to settlements;	The Policy considers applications on sites as yet unknown to the Council. The issues of sustainability is considered once a site is made known through the planning application process and would be considered amongst other matters of location and any nearby settlement and transport/public transport connectivity.
Clarification in the policy on what is classified as good access to the road network; and,	Good access to the road network is a reference to a suitable point where the site adjoins the highway where a vehicle could enter or exit a site safely. This is a technical description better set out in supporting text.
Is criteria a necessary or fair for sites that would comply with PPTS?	Criteria a is deemed appropriate in terms of the Councils strategy to provide enough pitches on identified sites to meet its need. Further, the Planning for Policy for Traveller sites (2015) criteria 10a & b make clear that Local Planning authorities should identify a supply of specific sites. The approach in the Local Plan and as required by PPTS 2015 is to have enough sites identified to meet the Districts need.
Criteria b is meaningless. Is it really expected that any site will not be accessible to services and facilities especially if criteria (c) is met ie has good access to the road network? No	Criteria b is considered appropriate to address the issue of isolated sites from settlement areas.

part of the district is that remote from settlements/ services and facilities.	
Criteria C should also be necessary for any intensification or expansion.	Criteria C is not necessary for DM10 as the sites for intensification/expansion already have established access to the road network.
Criteria a).and d) The Dover Society is of the strong opinion that local parish councils should be involved in implementation.	When planning applications are submitted, the relevant Parish Councils are given the opportunity to make comments which could include the use and interpretation of policy.

Summary of Proposed Changes

- There are no changes proposed to DM Policy 14 as a result of representations.

DM Policy 15: Self Build and Custom House Building (Reg 19 Policy H5)

In total 12 representations were made on this policy by 12 consultees.

Representations were received from:

Name	Organisation	Comment ID
Seb Willett	Langdon Parish Council	DLP1247
Glen Miles	Knights Plc C/O DHA Planning	DLP1715
Chris Moore	Plainview	DLP1929
Emily Penkett	Plainview	DLP1962
Kelly Lawrence	Deal Town Council	DLP2114
Derek Leach	The Dover Society	DLP3013
Mr Terence Hooper		DLP2927
Ms Sarah Gleave	Dover and Deal Green Party	DLP2813
Mrs Klaire Lander	Planning Consultant	DLP3600
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3333
Rebecca Foad	DHA Planning Consultants	DLP3623
Reece Lemon	Hume Planning Consultant	DLP3645

10 respondents stated that they agreed with the policy and 1 respondent stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
Building design, materials and building regulations are maintained	Design policies are still a consideration in determining applications for Self Build and Custom House Building
Parish Councils are involved in decision making on schemes	Parish Councils will be consulted on Self Build Planning applications in the same manner as other types of planning application.
Objection to the Self Build register tests of local connectivity, financial solvency and administration fee.	The Self Build register was reviewed in 2019 and found to have a high number of register persons or organisations compared to actual planning applications that had been submitted to the Council. Since the introduction of Self Build legislation in 2016 on one application identified itself as Self Build and that was only during an appeal against refusal of planning consent. In determining the most appropriate approach to meeting Self Build need for the Local Plan it was essential to determine a true level of need for those who could wish to Self Build and were financially solvent to carry out a scheme and to align the need on the register with those of a local connection as Self Build also contributes towards the Councils local housing need. Planning legislation allows for the setting of a fee where it is proportionate to the cost of processing applications to be on a Self Build register.
The Council should make land available for Self Build to meet both part 1 and 2 of the registers identified need.	Self Build planning legislation places a duty for Local Authorities to grant enough planning permissions for Self Build to meet the need identified on the authorities Self Build register. Only where a planning application identifies itself as a self build scheme will the duty then be considered a part of the planning decision making.
The site at The Street in West Hougham could be allocated as a suitable site for self and custom build housing.	Comment noted

<p>Some flexibility may be required in the policy, if there is a significant uplift in demand.</p>	<p>Comment noted, this would be a matter for the Plan review after adoption</p>
<p>The policy should include provision for making sites available via public bodies and other landowners and also consider whether such sites should be treated as exception sites within the planning system.</p>	<p>The desire to Self Build is a personal choice for many whom have the finance to carryout such a scheme. Whereas it is a desire for a type of housing it is not an essential need for accommodation like affordable housing. Alongside the Councils duty to grant planning permissions for Self Build to meet its identified need on the register, it needs to be acknowledge that Self Build is a personal choice and the location of development should still follow the principles of sustainable development as set out in national and local planning policies.</p>
<p>Self build has been defined solely as where a land owner has proposed their land to the council for self build, a self builder has subsequently approached the council. This is a very small part of self building.</p>	<p>The definition set out in the plan cover what national policy consider Self Build and Custom House Build to be.</p>
<p>Availability of sites should be publicised along with active support for those who want to get on the housing ladder.</p>	<p>The Council now publishes a list of sites that have gained planning permission for Self Build in the monitoring year 2020/21.</p>
<p>Acknowledge specifically the potential for self-build and custom house building to come forward as part of the redevelopment of previously developed 'brownfield' sites, which are not by their nature always within or directly adjacent to settlement areas.</p>	<p>DM Policy 15 is flexible enough to help facilitate suitable brownfield and edge of settlement sites as Self Build.</p> <p>National Planning Policy makes clear that development of isolated homes in the countryside should be avoided. Self Build on brownfield sites in the countryside isolated from settlements would only be permitted if they meet the national policy criteria one or more of: need for a rural worker, optimal use of a heritage assets or to secure the future of an asset, reuse redundant or disused buildings and enhance their setting, sub division of existing resident and the design is of exceptional quality. It is not appropriate to duplicate these national</p>

	policy criteria in the Councils Self Build Policy DM 15.
Certain site allocations, particularly in rural locations, have a set provision (eg. 10%) of self/custom build housing written into their allocation wording to ensure a more diverse and eclectic mix of new homes will come forward.	There is only a small need for Self Build on the Council register at present. Requiring Rural location to provide 10% for Self Build may prevent those types of site coming forward. DM Policy 15 is flexible enough to help facilitate a suitable site in the rural area to come forward for Self Build or to have some element of Self Build on the site.

Summary of Proposed Changes

- No changes are proposed to DM Policy 15 based on representations.

DM Policy 16: Residential Extensions and Annexes (Reg 19 Policy H6)

In total 10 representations were made on this policy by 9 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull	Dover District Council	DLP21
Duanne Poppe	Ringwould with Kingsdown PC	DLP1840
Jane Cook	St Margarets at Cliffe PC	DLP1886
Emily Penkett	Plainview	DLP1963, 1964
Mike Eddy	Walmer PC	DLP1982
Chris Moore	Plainview	DLP1932
Derek Leach	The Dover Society	DLP3014
Kelly Lawrence	Deal TC	DLP2814
Ms Sarah Gleave	Dover and Deal Green PArty	

2 respondents stated that they agreed with the policy and 3 respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
The value of the policy and duplication with national policy.	The NPPF2021 does not contain specific policy criteria for residential extensions or annexes. DM Policy 16 is appropriate as it sets out criteria that the type of development will be supportive which can the allow opportunities for

	homes to be adaptive to changing lifestyle and societal needs.
The purpose of the extension or annexe as set out in the planning application should be preserved in perpetuity so that it does not become a stepping stone towards over intensive separate dwellings.	Any change from an extension or annexe to a separate dwelling would require a planning application at which time the suitability of creating a separate dwelling would be assessed.
There should always be thorough and meaningful consultation with local residents.	Any extension or annexe proposed would need to address planning requirements for them, of which the appropriate level of public consultation as set out in planning legislation would be carried out.
Clause d) be edited to read "They would not cause harm to the setting of a heritage or natural asset; and would preserve or enhance the special architectural or historic character and appearance of a conservation area and its setting. Changes, first one is purely grammatical and the additional "or natural" would allow for trees etc to be protected further as trees add to some conservation areas;	Comment noted.
An amendment to the Policy on the lines of the "provision of water and energy saving measures have been incorporated into the design and layout of the proposed new build and consideration has been given to water and energy efficiency measures in the original structure"	DM Policy 2 Sustainable Design and Construction sets out the principles for good quality sustainable construction that includes amongst other matters design, layout and resource efficiency and saving criteria. On adoption of the Local Plan this Policy must be considered when assessing any planning application for development.

Summary of Proposed Changes

- Removed the word 'It' at the beginning of Policy criteria d and replace with 'The development would'.
- Consider additional criteria in the Policy to prevent the removal of any mature trees to support the climate change agenda and policies.

DM Policy 17: Houses in Multiple Occupation (Reg 19 Policy H7)

In total 5 representations were made on this policy by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Ross Miller	Masterton Robin Designs Ltd	DLP123
	Dover TC	DLP1362
Kelly Lawrence	Deal TC	DLP2116
Derek Leach	The Dover Society	DLP3015
Ms Sarah Gleave	Dover and Deal Green Party	

2 respondents stated that they agreed with the policy and 1 respondent stated that they objected to the policy.

Summary of Representations – Main Issues

Summary of Representations	Councils response
The Policy should be rigorously enforced and strong consideration should also be given to requiring planning applications for C4 HMOs especially in such areas as Folkestone Road & London Road in Dover which already have numerous C4 HMOs.	Comment noted
There have been an escalation of HMOs in the Dover urban area, affecting the economic profile of Dover as well as high levels of deprivation.	Comment noted
HMOs and high-density small flats have done little to contain the COVID19 virus in HMOs where kitchen and bathroom are shared by all residents in the building.	Comment noted
The Dover Society would welcome all Dover Town (DTC Area) Wards using Article 4 direction as they fall within the top 20% of deprived wards in England. Failing this we would suggest the three wards in Dover that fall within the top 10% of deprived Wards in England should be granted Article 4 direction. These Wards being St Radigund's, Town & Castle, and Buckland.	The evidence to demonstrate the need for an Article 4 direction(s) to address the creation of small HMO's without planning permission is outside the remit of Local Plan making. However, should Article 4 directions be put in place, the criteria in DM Policy 17 is considered appropriate to address any planning applications for small HMOs.

There should be a specific policy restricting the delivery of HMO properties within Conservation Areas and Listed buildings.	Permitted development rights that allow the creation of small HMOs are already removed in Conservation Areas. Article 4 direction in themselves do not prevent the creation of HMOs. They remove the permitted development right where small HMO's can be created without planning permission and thus in turn the change of a property to a small HMO would require a planning application. If in assessing the planning application the small HMO is deemed appropriate development the application would be permitted.
Support for a HMO policy which recognises the cumulative impact of HMOs in a street, a settlement and an area.	Small HMOs can be created through permitted development rights in areas where there are no article 4 directions. As a result, it is not possible for plan monitoring to identify the levels of small HMO being created in an area.

Summary of Proposed Changes

- There are no proposed changes to DM Policy 17 from representations.

Housing Policies - Regulation 19 Policy Name and Title changes

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 2 – Housing Growth</i>	<i>SP3 – Planning for Housing Growth</i>
<i>SP 3 – Residential Windfall development</i>	<i>SP4 – Residential Windfall development</i>
<i>DM12 – Affordable Housing</i>	<i>SP5 – Affordable Housing</i>
<i>DM Policy 11 – Type and mix of housing</i>	<i>H1 – Type and mix of housing</i>
<i>DM Policy 12 – Affordable housing</i>	<i>Replaced by SP5 – Affordable Housing</i>
<i>DM Policy 13 – Rural Local Needs Housing</i>	<i>H2 – Rural Local Needs Housing</i>
<i>DM Policy 10 – Gypsy and Traveller Site Intensification</i>	<i>H3 - Meeting the needs of Gypsies and Travellers</i>
<i>DM Policy 14 - Gypsy and Traveller Windfall Accommodation</i>	<i>H4 - Gypsy and Traveller Windfall Accommodation</i>
<i>DM Policy 15 – Self and Custom Build Housing</i>	<i>H5 – Self build and Custom Housebuilding</i>

<i>DM Policy 16 - Residential Extensions and Annexes</i>	<i>H6 - Residential Extensions and Annexes</i>
<i>DM Policy 17 – Houses in Multiple Occupation</i>	<i>H7 – Houses in Multiple Occupation</i>

Chapter 7 - Employment and the Local Economy

In total 138 comments were made on the Economy chapter. A summary of the representations received and the council's response to these representations is set out below.

Representations on the Chapter

In total 18 representations were made on this chapter by 18 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mrs Sue Ward		DLP249
Mr Nigel Wadey		DLP259
Reverend Seth Cooper		DLP338
Shelley Morris		DLP3251
Mr Jamie Pout		DLP527
Dr Raju Sakaria		DLP617
Mrs Jean Ross		DLP1400
Mrs Joanna Thomson	Goodwin Sands Conservation Trust	DLP2185
Ms Sarah Gleave	Dover and Deal Green Party	DLP2816
Mr Jason Jones-Hall	Pioneering Places East Kent	DLP875
Mrs Sacha Davies		DLP889
Rosie Rechter		DLP877
Julie Davies	CPRE	DLP820
Carlie Wilcock		DLP2887
Graham Clemas		DLP2402
Chris Shaw		DLP1208
Mr Adam Wadey		DLP1291
Mr Russell Thompson		DLP3750

Summary of Representations – Main Issues

Summary of Representations – Main Issues	Council's Response – Proposed Changes
"the increase in labour supply is much greater than the demand for jobs", so what is the point of building so many houses where there are already insufficient jobs?	Housing targets are set by Central Government. The updated Economic Growth policy seeks to deliver a minimum of 55,225sqm of

	new employment floorspace through a number of methods in accordance with the employment need for the district.
Good the plan supports rural communities and agricultural business but concerned that the Employment and Economy strategy is predicated on economic growth. The focus on out of town Business Parks seems to ignore the possibilities of town centres much in need of rejuvenation.	The Economic Growth Strategy for the district is supported by the updated EDNA (October 2021). There are specific town centre policies within the retail chapter to support town centre regeneration.
The anticipated growth in jobs within the Dover District has not materialised partly due to Covid-19. Economic recovery will take some time to take effect and is uncertain. Therefore, large developments should be only located in areas where jobs are available. The need to reduce carbon emissions and keep air pollution to within the legal recommendations for Air Quality, highlights the importance of minimising travel to work.	Employment Site allocations have been through the HELAA process and are in accordance with the Economic Growth Strategy and updated EDNA (Oct 2021)
Tourism is a major contributor to the local economy, there is a shortage of Certificated Locations in the District and they are often full to capacity at peak times. The Whitfield expansion will ruin my touring caravan site.	The tourism policy aims to support self catering tourist accommodation.
I welcome the need to include employment areas within Aylesham. This should be affordable units that allow a large number of businesses to start up and serve the village.	There is an allocated employment site in Aylesham within the Economic Growth policy.
DDC's 2017 EDNA report highlighted the decline in demand for employment space as justification for development on ecologically important sites, or building over green corridors. Employment is needed desperately in the area, particularly start ups and people relocating to the area. The EDNA states increased commuting due to lack of employment, leading to increased traffic congestion, air pollution and greenhouse gas emissions.	The EDNA is being updated to assess the change in economic circumstances, particularly in the context of the pandemic.
The plans put forward within the proposal stating, there are or will be work opportunities to develop the Snowdown Colliery are totally incorrect, there are no plans to sell or develop the Colliery site.	The Snowdown Colliery site is being considered as a potential allocated employment site in the Reg 19 plan.
There is no mention of the £250 million Dover Western Docks Revival project that according to the Port of Dover is intended to regenerate both the Port and the town of Dover and bring a stated 600 jobs to	The Economic Growth policy specifically refers to the Dover Western Docks.

the area over 15 years. There is no reference to the contribution that will be made to the local economy by the creation of reclaimed land from the Granville and Tidal basins.	
There appears to be no intention of using the Local Plan to improve educational attainment, specific policies would contribute to raising the average level of earnings in the district and to combating the high levels of deprivation experienced in some wards.	The Economic Growth policy is intended to tackle these issues.
A glaring omission relates to new economic opportunities created by climate-friendly recovery sectors. Another key to meeting climate targets is increasing the amount of land used for growing food for people rather than livestock. Rural areas, fields and woodland should be valued as locations of employment in themselves.	The EDNA sets out the evidence based approach to the economic growth strategy for the district. It is not within the remit of the Local Plan to allocate land for food production. Rural employment opportunities form part of the Economic Growth Policy and the new employment development policy
All rented housing stock (both public and private sector) should be upgraded to zero homes standard before 2040/50, the economy would benefit in terms of jobs created.	It is not within the Local Plan remit to impose these upgrades.
It will be important for the plan and SA to assess the inter-relationship of the location of new homes and with their labour supply and the location of new employment, and the resulting impact on air quality and climate change. Large developments either housing or employment should be only located in areas where workforce or jobs are, or will be, available.	The SA has assessed all employment allocations and there will be a specific policy for each site allocation.
Economic recovery will take some time to take effect and is uncertain and consideration will need to be given to the impact of: <ul style="list-style-type: none"> - COVID 19 and lockdowns on the demand for office floorspace. - BREXIT and role of the Port of Dover. 	The updated EDNA has considered these issues and informed the Reg 19 policies.
Additional policy needed: COVID19 has resulted in greater home working. It would be helpful to include a policy encouraging workhubs / workspaces with high quality broadband connections in suitable locations such as town and village centres.	There is a home working policy DM21 and home working has been considered in the updated EDNA (Oct 21) and Retail and Town Centre Needs Assessment.
I don't see that we have employment to support this huge expansion (Whitfield).	The EDNA has concluded we need additional employment floorspace.

	Employment and housing need have been considered together through the HELAA process.
There is little or no recognition of the benefits of culture and heritage-led regeneration. Fort Burgoyne is falling between the gaps as it does not sit within Dover Town Centre.	Fort Burgoyne is included within the Economic Growth policy and is to be allocated as an employment site in the Reg 19 Local Plan.
Changes in local farming practices and land management have resulted in a decline in traditional employment for rural inhabitants. The opportunity to encourage some small scale enterprises using spare capacity in farmyard buildings may offer local employment, reducing travelling costs and retaining dwindling rural skills.	This is covered in the new employment policy, providing the accompanying policy criteria can be satisfied.
With the area's current and foreseeable economic conditions, in which Dover District lacks demand for jobs, how could DDC justify massive new housing developments such as that proposed in Whitfield?	The EDNA concludes that additional employment floorspace is required in the plan period. The housing targets for each district are based on national targets, which Local Authorities need to plan for.
There are limited employment opportunities in Deal yet Deal is supporting a disproportionate number of new houses.	The housing and employment sites have been through the HELAA process and the suitability criteria is set out within this assessment.

Representations on the issues identified

In total 6 representations were made on this section by 6 consultees.

Representations were received from:

Name	Organisation	Comment ID
Robin Green		DLP589
Dr Sharon Danby		DLP950
Mike Eddy	Walmer Parish Council	DLP2006
Kevin Bown	Highways England	DLP1807
Barbara Cooper	Kent County Council	DLP1733
Mrs Julie Bates		DLP1301

0 respondents stated that they agreed with the issues, 3 respondents stated that they objected to the issues identified and 3 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
<p>The Deal Society questions whether the Draft Plan takes sufficient account of the effect of the Covid 19 pandemic on the national economy. It may take decades to repair the economic damage and radically affect the ability of developers and local authorities to deliver the national government targets on house building.</p>	<p>The Economic Development Needs Assessment is being updated as part of the evidence base. This will indicate initial findings from the impact of the pandemic, in order to inform the Regulation 19 version of the Plan. It is likely, as indicated in the comments, that the impacts of the pandemic will be long lasting and policies will adopt a flexible approach to support economic recovery.</p>
<p>Opportunity to embrace a green recovery from the pandemic and greater investment in green jobs.</p>	<p>Comment noted, the Economic Growth Strategy supports the green economy.</p>
<p>Much of this chapter is not directly relevant to Walmer Parish Council though a thriving economy and a pleasant environment throughout the district are clearly beneficial to Walmer’s residents.</p>	<p>Comment noted.</p>
<p>Highways England welcomes Dover’s aim to utilise the Port as a catalyst for growth in the area, mindful of the impact this would have upon the Strategic Road Network (SRN). As such Highways England will seek to work with Dover District to ensure the smooth operation, safety, and reliability of the SRN. Highways England is supportive of increasing tourism within the area, mindful of the impact this would have upon the SRN to effectively manage the increase in trips. Highways England supports the revitalisation of town centres combined with increased public transport connections and active mode improvements, to promote sustainable travel and reduce vehicle trips.</p>	<p>Comments noted and the Council will continue to liaise closely with Highways England.</p>

The Local Plan will have to be flexible and resilient to adapt to the changing needs of employers as the full impacts of the COVID-19 pandemic and its impact on the local workforce become apparent – and the County Council therefore supports the district council’s intention to take a flexible approach to high streets. The Local Plan should be adaptable to accommodate changing trends in work patterns and changing demands for employment space.	Comments noted. The policies within the Economy chapter are designed to enable flexibility.
Statements in 7.34 seem completely without foundation -why will Dover District be so desirable for businesses? There is nothing to indicate what the plan is to create this.	This is the Council’s Economic Growth Strategy for the district, to be complimented by the other policies within the Local Plan and supported by the updated EDNA (October 2021).

Representations on the options identified

In total 5 representations were made on this section by 5 consultees.

Representations were received from:

Name	Organisation	Comment ID
Jane Cook	St Margaret’s-at-Cliffe Parish Council	DLP1887
Sonja Watsham		DLP2565
Mr Jason Jones-Hall	Pioneering Places East Kent	DLP887
Kevin Bown	Highways England	DLP1808
Mrs Lesley Neil		DLP3215

0 respondents stated that they agreed with the options, 2 respondents stated that they objected to the options identified and 3 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
The strategic issues and policies covered in this section appear to be well considered and constructed.	Comment noted.
This could have been the moment for the Council to identify new projects, investment and employment opportunities, we need specific plans for recruiting and training local people. The Plan refers to new patterns of working being necessary in the context of Brexit and of the pandemic, but there is no specific reference to strategies DDC will adopt for meeting the changes needed in the economy to mitigate and adapt	Climate change is a key driving force within the Local Plan, the policies within the Economy Chapter are to be read in conjunction with the more specific climate change policies, as with many

<p>to Climate Change. New Employment is considered, but in terms of Dover Port, tourism, offices, buildings and business parks, rather than jobs and people. The “rural economy” section refers to buildings, small businesses, infrastructure to cater for more people working from home, but no mention is made of jobs rooted in the rural economy, such as agriculture, agroforestry. Occasionally Climate Change is referred to, but appears to be a distinct add-on.</p>	<p>other relevant policies. It will be clearly indicated in the Regulation 19 version of the Plan where multiple policies apply. The updated Economic Development Needs Assessment details the floorspace requirements for the district rather than job numbers in terms of need.</p>
<p>There is an opportunity to consider regeneration of the 42ha Fort Burgoyne site for employment use. Economic development of this site would also be consistent with several of the key themes of the Economic Growth Strategy. Para 7.34 should be amended (see full comment for specific details).</p>	<p>Comments on the Economic Growth Strategy will be considered separately as part of updates to that document.</p>
<p>Highways England is supportive of growth at the right time and in the right place, with the right infrastructure. Working with the Council in a flexible manner to ensure that appropriate mitigation measures are taken to support both the local road network and the SRN, Highway England can assist with enabling development.</p>	<p>Comments noted.</p>
<p>Highways England notes the dual use of White Cliffs Business Park for the White Cliffs IBF until 2025, which limits the original expansion of employment growth in this area as originally intended. Highways England notes that a Call for Employment Sites is currently underway as part of the Reg 18 of the consultation on the DDLP. Highways England will expect to be consulted on the suitability of these sites as a key stakeholder in due course.</p>	<p>Comments noted. Highways England will be consulted.</p>
<p>While the intent to improve tourism within Dover is supported by Highways England, consideration should be given to providing sustainable transport links and active modes to decrease overall vehicular trips, while providing quality connective links throughout the area.</p>	<p>Comment noted. The employment policies should be read in conjunction with other policies such as the Strategic Policy for Dover Town Centre and SP1 – Climate Change.</p>
<p>Highways England is supportive of home working to decrease the number of overall trips made and promote localised trips which can be undertaken via active modes.</p>	<p>Comment noted.</p>
<p>Highways England has no comments to make on the preferred policy approach for Rural Economy, but is supportive of policies to improve the rural economy and improve connectivity.</p>	<p>Comment noted.</p>

Tourism should be a section in the plan in itself, as it's the area's biggest potential asset.	Tourism is a key issue within the plan and is addressed in the Economy Chapter, has a dedicated Topic Paper and there is also a Tourism Strategy separate to the Local Plan. It is not proposed to separate Tourism out from the Economy Chapter.
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Strategic Policy 8: Economic Growth (Reg 19 Policy SP6)

In total 18 representations were made on this policy by 17 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Martin Brandon		DLP353
Mr Ross Miller	Masterton Robin Designs Ltd	DLP430
Derek Leach	The Dover Society	DLP3016
Sonja Watsham	East Kent Climate Action	DLP2567
Mr Mark Burton		DLP786
Kelly Lawrence	Deal Town Council	DLP2121
Ms Sarah Gleave	Dover and Deal Green Party	DLP2817
Alan Byrne	Historic England	DLP1660
Mike Eddy	Walmer Parish Council	DLP2007
Mrs Christine Oliver		DLP1087
	Canterbury City Council Planning Department	DLP1506
	The Land Trust	DLP1892
Barbara Cooper	Kent County Council	DLP1734
Patrick Mufet	Bee Equipment Limited	DLP1173
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3320
Kevin Bown	Highways England	DLP1783, DLP1785
Jason Ransley	Dover Harbour Board	DLP1224

5 respondents stated that they agreed with the policy, 5 respondents stated that they objected to the policy and 7 respondents did not state that they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
<p>No reference to ongoing health emergency, which will result in a much reduced economic growth in the plan period. There should be a reduction in new employment sites and emphasis on protecting existing sites rather than establishing new ones. Reduce the amount of land newly allocated for employment needs.</p>	<p>There is a new Strategic Policy, Planning for Healthy and Inclusive Communities, which should be read in conjunction with the other policies in the Local Plan to include the Employment and Local Economy policies. The updated EDNA has concluded that additional employment space is required within the plan period.</p>
<p>Needs to be clear about targets, timelines and expected outcomes. The outcomes should include the expected economic benefits.</p>	<p>The policy has been updated to include targets and aims.</p>
<p>The policy appears to leave it up to others to come forward with plans which the Council will then support. The Council needs to build in external advice on economic development to provide the ability for a more positive approach and plans, including approaching potential investors. The effects of Brexit and the pandemic, both long and short term, are to a large degree unknown, hence the need for a plan that is capable of a considered review and revision.</p>	<p>The Regulation 19 Local Plan includes a clear Economic Growth Policy, supported by the updated evidence within the EDNA (Oct 2021). This will be updated again within the early stages of the local plan, as with the Retail and Town Centre Needs Assessment, to be sure to capture any issues in addition to the policy monitoring indicators.</p>
<p>We note to our surprise in SP 8 that targets for future jobs growth will be available when Economic Development Needs Assessment has been updated. Surely such information needs to be a vital component of a Local Plan, particularly with the total rethink that is needed now.</p>	<p>The updated EDNA (Oct 2021) includes evidence for additional employment floorspace, which the updated Economic Growth policy in the Regulation 19 version of the Local Plan now includes.</p>
<p>Digital infrastructure is becoming vital and its provision to the whole area needs improvement, this includes the rural communities/villages. In Dover regardless of your provider, the Dover exchange is a potential single point of failure. Alternate routes need to be made available. The area is also slow to receive improvements compared to other areas/towns.</p>	<p>DM Policy 35 – Digital Technology requires all new residential and employment development to have gigabit capable connections.</p>
<p>Economic growth should be within the context of an appreciation of the high quality and sensitive environments in which it will take place.</p>	<p>The employment policies include criteria relating to the impacts to landscape and biodiversity.</p>

<p>Add the following to the first paragraph in this Policy, after the words “economic growth in the District”: “...provided that measures are put in place to ensure no negative impact on the blue and green infrastructure.”</p>	<p>The policy is to be read in conjunction with SP17 – Green Infrastructure and Biodiversity.</p>
<p>Recommend wording be amended to reference a zero carbon future. We want to attract investment and skills to ensure that we are a leader in green tech, renewable energy, retrofitting and green health and social care, that will be necessary to meet our Zero Carbon commitment.</p>	<p>Policy SP1 addresses the climate change agenda for the district.</p>
<p>(Canterbury City Council) We would observe that the draft Local Plan sets out an approach to meet in full the Dover housing and employment needs within the District Boundary. This is consistent with national policies, the MOU prepared by the East Kent authorities and our emerging Statement of Common Ground.</p>	<p>Comments noted and confirmed.</p>
<p>The County Council is supportive of the policy commitments to deliver economic growth in the district and would welcome further engagement to ensure the necessary infrastructure is in place to support economic prosperity and employment opportunities</p>	<p>Comments noted and DDC will continue to liaise with KCC.</p>
<p>The Local Plan should support and encourage improvements to the PRow Network, as the provision of high quality walking, cycling and equestrian infrastructure would enable the public to explore Kent’s countryside and support the rural economy. Analysis of the existing PRow resource in Kent has identified a shortage of opportunities for higher right path users, with relatively limited off-road cycling and equestrian routes compared to the national average.</p>	<p>It is not in the Local Plan's remit to designate cycling and bridleways but policy DM4 – Sustainable Travel seeks to address this issue.</p>
<p>We recommend amendments to the creation of jobs in the climate-friendly recovery sectors with land allocations designated for various forms of agri-forestry, market gardening, and renewable energy projects.</p>	<p>The updated EDNA has not concluded this as a recommendation and the Local Plan policies must be evidence based.</p>
<p>The Plan as currently drafted does not mirror the positive ambition set out in the Economic Growth Strategy. We support the preferred option of higher economic growth.</p>	<p>The Council has set out its economic growth strategy in the Reg 19 Local Plan based on the updated EDNA (Oct 2021).</p>
<p>Disappointingly unambitious and insufficient recognition of recent changes and events which will impact local, national and international economic environment. No reference to greener jobs.</p>	

Within the EDNA, Dover has been advised to seek clarity in planning policy terms and develop a clearer strategy guide to development for economic land going forward. Highways England considers that future development of economic land and employment sites will be re-evaluated at that time and will have a further opportunity to comment.	
Highways England supports the above economic growth in areas where infrastructure is suitable and appropriate mitigation measures are provided to ensure that the safety, operation, and reliability of the SRN in line with MHCLG NPPF 2019 Para 108-11 & DfT Circ 02/13Para 8 -11.	Comment noted.
We should be pursuing policies that embrace a green approach and taking proper account of the impact of carbon emissions in everything that we do including every bit of economic activity.	Policy SP1 is the overarching policy to address climate change within the Local Plan.
Attracting lots of jobs is desirable but they need to be well paid high quality jobs. Our local economy has too many low paid jobs.	The EDNA sets out further detailed analysis of the projected job growth to 2040.
It is essential we do what we can to revive local businesses particularly in the tourism sector following the damage caused by the Covid pandemic.	Policy DM24 relates to Tourism specifically in the Employment Chapter.
We should be working in partnership with the Dover Harbour Board to ensure that it retains its important position as a key transactional gateway to the European Union and beyond.	The port is included within the Economic Growth Policy.

Summary of Proposed Changes

- An updated Economic Development Needs Assessment (EDNA) will be prepared which takes into account the latest completions and applications data, up to date trends, Brexit and the covid-19 pandemic and reflects the revised NPPF and the changes to use classes order.

Strategic Policy 9: Employment Allocations

In total 29 representations were made on this policy by 23 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP27
Mr Phillip Coleman		DLP53
	Deal and Walmer Chamber of Commerce	DLP89

Ross Miller	Masterton Robin Designs Ltd	DLP504
Derek Leach	The Dover Society	DLP3017, DLP3018
Kelly Lawrence	Deal Town Council	DLP2122
Ms Sarah Gleave	Dover and Deal Green Party	DLP2818
Mrs Samara Jones-Hall		DLP814
Mr Jason Jones-Hall	Pioneering Places East Kent	DLP882, DLP890
Katie Razzell	Aylesham Parish Council	DLP1922
Miss Laura Fidler	Sandwich Town Council	DLP1814
	Richborough HA Ltd and UGE	DLP1849
Mrs Christine Oliver		DLP1357
	The Land Trust	DLP1860, 1894, 1798
Mr Nathan Burns	Natural England	DLP1434
Chris Telford	The Coal Authority	DLP1731, 1336
Barbara Cooper	Kent County Council	DLP1735
Cllr Edward Biggs	DDC –Town and Castle Ward	DLP1983
Patrick Murfet	Bee Equipment Limited	DLP1174, 1175
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3321
Kevin Bown	Highways England	DLP1784
Jason Ransley	Dover Harbour Board	DLP1225
Andrew Howard-Grigg	Temple Ewell Parish Council	DLP2937

5 respondents stated that they agreed with the policy, 14 respondents stated that they objected to the policy and 10 respondents neither agreed or objected. (It is worth noting some respondents made more than one comment).

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
There is no strategic allocation for Deal, an allocation should be included. Part of the land submitted for development but rejected at the initial call for sites stage behind Jewsons/Hutchings should be allocated as a strategic employment site where it will have direct access to the A258-north Deal connecting Road.	Comment noted. The Housing and Employment sites have been assessed through the HELAA process. Further details are available of the assessment criteria, but only suitable sites can be allocated.
The Guston border force site will cause a lot off traffic problems for the Guston area.	Comments noted. The location of the Inland Border Facility is a

Whilst the sites are identified, the Plan needs to recognise that there must be an active promotion of the sites' potential.	national government decision, and therefore beyond the remit of the Local Plan.
The White Cliffs Business Park should not include any lorry park activity/facility. This includes the latest proposal for an Inland Border Facility (IBF). It is noted the IBF would be for a maximum of five years. The IBF should not be shown as "White Cliffs Inland Border Facility as this would greatly diminish the tourism brand and it is considered either "Whitfield IBF" or "Dover IBF" should be used.	
It is difficult to argue with the sentiments of this policy; it is imperative that the proposed restrictions are rigorously enforced and applied to ensure no detriment to town centres or further drift of retail outlets to industrial/business locations.	The policy will be accompanied by an implementation section to detail further how the policy will be applied.
Deal Town Council supports this policy. There are no allocations in Deal. Public Transport links to Whitfield and the Discovery Park, Industrial Estate and Ramsgate Road site in Sandwich need improving.	Comments noted. Each allocated site will also have a site specific policy detailing further requirements for transport links.
Needs the addition of farming land in Dover district because outdoor employment on the land as described above should be thought of as a place of employment.	The allocated sites have come forward as a result of site assessments undertaken as part of the HELAA process. Farming land does not fall within the remit of these assessments.
Delete reference to Manston Airport at paras 7.45 and 7.46 in the descriptions of Discovery Park and Ramsgate Road employment sites. The DCO approving a freight airport was quashed following a judicial review.	Reference to Manston Airport is given in terms of proximity to existing infrastructure.
Add Fort Burgoyne as an Employment Site, or include Edge of Centre in para 7.52 to ensure that sites which neither fall within Town Centre or Rural areas aren't excluded from consideration. The site should be given a similar flexible use as per Sandwich Industrial Estate and Dover Waterfront.	Fort Burgoyne is included as an allocation in the Reg 19 Local Plan.
We support the specific identification of Dover Waterfront as a Strategic Allocation.	Comment noted.
Aylesham Parish Council welcomes the additional employment opportunities within the village.	Comment noted.
Sandwich Industrial Estate, Discovery Park and Ramsgate Road sites are supported and if there is any opportunity to attain a favoured status (i.e. Enterprise Zone status) for all three	Comment noted. Enterprise zones would be within the Local Enterprise Partnership remit.

sites, not just Discovery Park, this should be sought.	
There is need for more sustainable energy sites in the District, additional site promoted at Richborough (DLP1849 for further details).	Comment noted. Additional sites submitted will be assessed.
Recommend that the following be added: The Council will map the areas within the Dover District that would be potentially suitable to deliver renewable and low carbon energy schemes.	This is not proposed, policy CC3 is applicable across the district.
The Coal Authority requests the identification of the Snowdown Colliery site in Strategic Policy 9: Employment Allocations and if the site is not to be identified, the development management policies should be amended to take a positive and flexible approach to future economic growth at the site. Need to acknowledge that more land is likely to be required to deliver this strategy beyond the sites currently allocated; as discussed in the Topic Paper.	This site is allocated for employment uses in the Reg 19 Local Plan.
It needs to be clear as to whether previous employment allocated sites are revoked or remain until such time as the review has been completed.	The current Core Strategy and Land Allocations Plan remain the Council's primary policies for decision making until such time as a new Local Plan is adopted. It may be as the new local plan reaches Reg 19 stage, however, and beyond that weight could start to be given to emerging policies in decision making.
Dover Waterfront- Any future development in this area would be required to provide full transport assessment evidence to support development and to mitigate its own traffic movements. Highways England will require consultation on development at the key employment sites and is willing to work towards a positive outcome.	Comments noted and liaison with Highways England will continue throughout the Local Plan process.
We consider the old railway yard adjoining Kearsney station may be suitable, perhaps for the development of small business start-up units.	If this site has not been submitted through the call for sites process, it may be suitable for consideration under policy DM 18 – New Employment Development. Pre-application advice could also be sought through the Development Management team.
Natural England notes that some of the proposed employment allocations have various	Comments noted. Each allocation will have a site specific

potentially significant impacts on designated sites and protected landscapes. We strongly suggest adding wording making clear the requirements of employment development for these allocations to ensure there will be no adverse effect on the any designated sites or their interest features.	policy where wording as suggested will be applied as supported by the HRA and SA.
Public Rights of Way – The County Council requests clarification in respect to comments previously provided on Sandwich Industrial Estate, Aylesham Industrial Estate, Betteshanger Colliery, White Cliffs Business Park, Dover Western Docks, Whitfield Urban Extension. (DLP1735 for details)	Each employment site allocation will have a site specific policy where the detailed comments provided will be addressed.
The County Council, as Minerals and Waste Planning Authority, notes that two employment allocations appear to be within 250m of safeguarded waste management sites: <ul style="list-style-type: none"> • Ramsgate Road, Sandwich-Waste management facility Kent Renewable Energy • Sandwich Industrial Park- Waste management facility South East Auto Parts The Local Plan will need to demonstrate how the requirements of Policy DM 8: Safeguarding Minerals Management, Transportation, Production & Waste Management Facilities of the KMWLP have been considered, where such development is potentially being allocated within 250m of safeguarded facilities.	Comments noted. These sites are existing employment sites and are identified on the policies map. They are not proposed as allocations in the Reg 19 Local Plan. Any future applications on those sites will need to include a minerals assessment and will need to consult with KCC Waste and Minerals as the comment highlights.

Summary of Proposed Changes

- The policy will be accompanied by an implementation section to detail further how the policy will be applied.
- There will be site specific employment allocation policies included in the Reg 19 plan

DM Policy 18: New Employment Development (Reg 19 Policy E1)

In total 10 representations were made on this policy by 10 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Martin Brandon		DLP354
Mr Ross Miller	Masterton Robin Designs Ltd	DLP505
Sonja Watsham	East Kent Climate Action	DLP2566
Kelly Lawrence	Deal Town Council	DLP2123
Katie Miller	Kent Downs AONB	DLP1491

Alan Byrne	Historic England	DLP1661
Barbara Cooper	Kent County Council	DLP1737
Ms Marnie Canton	Sandwich Environmental Conservation Group	DLP3322
Richard Follett	Willmarsh Developments Ltd	DLP3646
Julie Davies	CPRE	DLP3743

4 respondents stated that they agreed with the policy, 3 respondents stated that they objected to the policy and 3 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Support: 1. the plan requirements for extensions to employment premises in the countryside to demonstrate that they would not have a detrimental impact on the character of the landscape; 2. The plan requirements that new employment development be at a scale that is appropriate to the existing settlement in rural areas and without detriment to its amenity character or setting; 3. That any employment development would not have a significant adverse impact on the living conditions of existing residents. I hope the council will set the bar very high in applying the above requirements.	Comments noted.
This is a positive move that should support enhancement to employment opportunities but must not be seen or used as a method to expand existing settlements.	Comment noted.
Climate change needs to be driving the agenda. DDC residents need to know what lead DDC proposes to take, and what specific projects it envisages to really reboot our local economy.	The policies within the Economy Chapter are to be read in conjunction with the more specific climate change policies.
Deal Town Council supports this policy.	Comment noted.
For consistency we would recommend the same amendments as to Strategic Policy 3: Residential Windfall Development to ensure that employment development does not take place outside of settlement boundaries where this would be within an AONB.	Comments noted, the policy is being amended for the Reg 19 plan.
How might the plan conserve and enhance the quality of the historic environment in order to	These issues are covered across the employment chapter and through a

encourage tourism, help create successful places for businesses to locate and attract inward investment?	combination of policies within the plan.
Public Rights of Way - Reference should be made to the need to include active travel options and the safety of NMUs on rural roads.	Sustainable travel is addressed in Policy DM 4.
Weak policy on sustainability of new developments – needs to be in line with housing standard at least, unless specific reasons for non-compliance which have a higher priority than climate change policies.	New employment will still need to comply with other policies in the plan such as SP1 – Climate Change, but it is not proposed to set specific standards for employment sites as with housing standards.
'within or immediately adjoining' the settlement boundaries of designated settlements (as per SP3) is regarded as overly restrictive, and restricting sites on previously developed land which may fall beyond the settlement boundaries. It is submitted that this wording goes beyond the provisions of the NPPF. The policy recognises Eastry as a local centre, would be a sustainable location for new, enhanced or reconfigured employment development in principle. The policy should reflect more closely the objective and intent of the NPPF in these terms.	Comment noted. The policy for Reg 19 will reflect the parameters of the NPPF.
An additional criterion should be added for sites that are adjacent to existing or new communities requiring safe active travel routes between them.	Sustainable travel is addressed in Policy DM 4.

Summary of Proposed Changes

- Revised policy will be more flexible within guidance set out in updated 2021 NPPF, and will reference settlement boundaries

DM Policy 19: Retention of Existing Employment Sites (Reg 19 – Policy merged with Policy E2 Loss or redevelopment of Employment Sites and Premises)

In total 6 representations were made on this policy by 6 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3020
Kelly Lawrence	Deal Town Council	DLP2124
Ms Sarah Gleave	Dover and Deal Green Party	DLP2819
Barbara Cooper	Kent County Council	DLP1736
Patrick Murfet	Bee Equipment Limited	DLP1177
Jason Ransley	Dover Harbour Board	DLP1227

2 respondents stated that they agreed with the policy, 2 respondents stated that they objected to the policy and 2 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
No Comment.	Noted.
Deal Town Council supports this policy.	Noted.
To the list should be added the farming land and neglected coppicing sites and other sites of outdoor rural employment.	Farming land falls outside the definition of employment land for the purposes of this policy.
Geometrical constraints exist on the approach roads to the Pike Road industrial estate (for example Barville Road is regularly subject to overrun from HGV traffic), and this has led to recent planning proposals being resisted for sites located within this estate. Therefore, whilst the retention of existing uses on the site is accepted, further development on this estate that increases the frequency of larger of HGV trips above and beyond current baseline should be resisted, unless necessary improvements can be made to the surrounding highway network. It would be prudent for this to be included as a specific policy for this site.	Comments noted.
The Local Plan as presently drafted does not provide for the Snowdown site to be brought forward under DM Policy 18: New Employment Development because it does not fall within the current definition of an existing employment sites. Allocation of the site under SP Policy 9 is, therefore, appropriate and necessary to support the significant benefits that can be delivered from its regeneration. Identify site under DM Policy 19 as an existing employment site.	Comment noted. This site is allocated within the Reg 19 Local Plan.
We support the objectives of DM Policy 19: Retention of Existing Employment Sites to restrict retail development and other main town centre uses to existing town centres unless they are supported by other policies in the Plan. However, we request that the policy recognises that in locations (such as Dover Waterfront) where there is already a significant amount of floorspace in retail and town centre uses, proposals for the development/reprovision of equivalent floorspace for such uses will not be required to satisfy the Sequential Test requirements of DM Policy 26.	Dover Waterfront is an allocation in the Reg 19 Local Plan.

Summary of Proposed Changes

- There are no proposed changes from representations

DM Policy 20: Loss or Re-development of Employment Sites and Premises (Reg 19 Policy merged with Policy E2 - Loss or redevelopment of Employment Sites and Premises)

In total 3 representations were made on this policy by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3021
Kelly Lawrence	Deal Town Council	DLP2125
Alan Byrne	Historic England	DLP1662

1 respondent stated that they agreed with the policy, 0 respondents stated that they objected to the policy and 2 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
No comment.	Noted.
Deal Town Council supports this policy.	Noted.
What opportunities are there for heritage-led regeneration?	This policy is to be read in conjunction with the heritage policies within the plan.

Summary of Proposed Changes

- There are no proposed changes from representations

DM Policy 21: Home Working (Reg 19 Policy E3 -Businesses Operating from a Residential Property)

In total 5 representations were made on this policy by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3022
Mr Ross Miller	Masterton Robin Designs Ltd	DLP506
Jane Cook	Str Margarets-at-Cliffe Parish Council	DLP1888
Kelly Lawrence	Deal Town Council	DLP2127

Ms Sarah Gleave	Dover and Deal Green Party	DLP2823
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1 respondent stated that they agreed with the policy, 1 respondent stated that they objected to the policy and 3 respondents did not state whether they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
The policy looks backwards to the home working of builders etc. It should be capable of change to include the effects of the pandemic on new types of home working i.e. firms now getting office workers to home work and potential for a long-term effect. A more attractive Dover with the high-speed rail link could attract DFLs with its economic benefits.	Comments noted
It is essential that residential areas are not undermined by unsuitable businesses being set up under the guise of homeworking.	Comments noted
The Parish Council (St Margarets-at-Cliffe) occasionally receives planning applications that could result in inappropriate business activity in a residential setting. Therefore the controls a, b and c in this policy are welcome, particularly b which recognises that additional traffic flow could be harmful.	Comments noted
Add section ‘d’ ‘To encourage homeworking’.	Comments noted, it is not proposed to amend this policy.
We recommend adding ‘all large out-of-town developments should include co-working spaces, (of interest to all parents who have had to work from home and home school during the pandemic), directly adjacent to car-club spaces and electric bike parking.	Comments noted

Summary of Proposed Changes

- There are no proposed changes from representations

DM Policy 22: Conversion or Re-build of Rural Buildings for Economic Development Purposes (Reg 19 Policy merged with E1)

In total 11 representations were made on this policy by 11 consultees.

Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3023
Mr Ross Miller	Masterton Robin Designs Ltd	DLP507
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1890
Kelly Lawrence	Deal Town Council	DLP2128
Ms Sarah Gleave	Dover and Deal Green Party	DLP2824
Katie Miller	Kent Downs AONB	DLP1492
Alan Byrne	Historic England	DLP1663
Barbara Cooper	Kent County Council	DLP1738
Cllr Edward Biggs	DDC ward – Town and Castle	DLP1981
Patrick Murfet	Bee Equipment Limited	DLP1178

4 respondents stated that they agreed with the policy 0 respondents stated that they objected to the policy and 7 did not state that they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Conversion of agricultural buildings takes jobs out of rural areas.	Comments noted.
As with other policies it is essential that this is rigorously applied and enforced to ensure no further erosion of rural communities and their amenities.	Comments noted. This policy has been merged with E1 in the Regulation 19 Plan. The implementation section provides details how the policy will be applied.
The criteria in these policies offer robust safeguards against inappropriate development and it is hoped these will be strictly applied to planning applications while allowing projects that could benefit the local and wider community.	
Deal Town Council supports this policy.	Noted.
This minor accommodation is welcome, allowing indoor office space. It has been cited by DDC officers when we ask about protecting the outdoor farmland and woodland as locations of employment; clearly office space and fields / woods serve different productive purposes.	Noted.

<p>It is noted that this policy is more permissive than elsewhere in Kent because there is no requirement for the existing building to have historic value or to be capable of conversion without rebuilding - indeed rebuilding is specifically allowed for. This has the potential to significantly increase the level of development in rural areas. There should be a reference to the Kent Farmsteads Guidance and the Kent Downs AONB Farmsteads Guidance within the policy to ensure that proposals reflect the character and significance of farmsteads.</p>	<p>Amend policy to include historic building criteria.</p>
<p>What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people?</p>	<p>The NPPF supports the conversion of rural buildings to deliver sustainable growth and expansion of all types of business and enterprise in rural areas. The policies are aimed at enabling this where appropriate.</p>
<p>Active Travel opportunities and infrastructure should be available to ensure connectivity to transport hubs and local facilities to reduce the need for private vehicles.</p>	<p>Sustainable travel is addressed in Policy DM 4.</p>
<p>The County Council recommends that this policy includes recognition that the rural building itself may be of historic value. There are many rural buildings in Dover that are not Listed Buildings, but which have historic significance that could be affected by conversion. KCC recommends that point b is amended as follows: “The building is to be converted or rebuilt in a way that preserves its historic significance and the rural character of the area” Historic England has provided guidance on this “Adapting Traditional Farm Buildings Best Practice Guidelines for Adaptive Reuse (Historic England, 2017)”.</p>	<p>Reference to the guidelines document will be added to the supporting text of the policy.</p>
<p>The County Council appreciates that this policy will help farmers diversify and local businesses grow and expand. This is important in during COVID-19 recovery where many small businesses have had to change business models. With reference to part c) of this policy, which states that “that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it” – this should be balanced with the need for appropriate rural growth that may be required to support local communities.</p>	<p>Comments noted. Travel plans may be required in order to satisfy this part of the policy. Further detail will be provided in the implementation section.</p>
<p>The County Council would also welcome recognition regarding the increase in size of farm machinery.</p>	<p>Comment noted. If such alterations would require</p>

Farm machinery that needs to be taken from field to field (often by contract farmers farming someone else's land) and the increasing size of this machinery makes it difficult to access some lanes. Farmers will need to alter the access and egress to farm sites and create new entrances to some fields. The Local Plan should take into account of the need to support local farmers in ensuring appropriate access points.	planning consent the criteria in this policy would apply.
The County Council considers that there may be some exceptions to the policy requirement that conversions or replacement building need to be in the same form, bulk and general design. This could be restrictive on economic growth and rural business development	Comments noted.
Converting rural buildings for non-residential use, there should be a priority to stimulate the local economy, on too many occasions we are seeing life-style dwellings approved.	Each application would be considered on a case by case basis and this policy applies specifically to conversion for economic development purposes.
We note the preferred policy to include specific policies for conversion of rural buildings and a criteria based policy for rural sites to allow for a more bespoke approach to rural development, we support DM Policy 22 but it is not clear from the wording of these policies whether they would support the development of the Snowdown site.	The Snowdown Colliery site is allocated in the Regulation 19 Plan with a specific site policy.

Summary of Proposed Changes

- Policy to be merged with E1
- There will be an implementation section to accompany the policy further detailing how the policy will be applied.
- References to other relevant guidance will be added.

DM Policy 23: New Employment Premises in the Countryside (Reg 19 Policy merged with E1 – New Employment Development)

In total 7 representations were made on this policy by 7 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Martin Brandon		DLP355
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1889
Kelly Lawrence	Deal Town Council	DLP2129
Ms Sarah Gleave	Dover and Deal Green Party	DLP2825

Barbara Cooper	Kent County Council	DLP1739
Patrick Murfet	Bee Equipment Limited	DLP1179
Derek Leach	The Dover Society	DLP3024

2 respondents stated that they agreed with the policy, 1 respondent stated that they objected to the policy and 4 respondents did not state if they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
The plan says new employment premises will not be permitted in the countryside unless exceptional circumstances apply. This is supported.	Noted.
No comment.	Noted.
The criteria in these policies offer robust safeguards against inappropriate development.	Noted.
Deal Town Council supports this policy.	Noted.
This minor accommodation is welcome, allowing indoor office space.	Noted.
The County Council welcomes the inclusion of the Kent Farmsteads Guidance. Active Travel opportunities and infrastructure should be available to ensure connectivity to transport hubs and local facilities to reduce the need for private vehicles. The County Council appreciates that this policy will help farmers diversify and local businesses grow and expand.	Reference to this guidance document will be included in the supporting text to the policy.
We request that DM Policy 23 is revised to afford specific consideration to brownfield sites in the countryside and the benefits that redeveloping such sites bring. In the case of brownfield sites like Snowdown Colliery, it is not considered reasonable to restrict new uses to those which specifically require a rural location. The policy needs to be sufficiently flexible to facilitate and encourage the redevelopment of brownfield sites while recognizing that any new use needs to be sensitive to the character and appearance of its location.	Comments noted in relation to the need for a flexible policy. The policy will be updated to include more flexibility.

Summary of Proposed Changes

- Policy has been merged with E1
- Kent Farmsteads Guidance will be referenced
- Flexibility will be added around brownfield and location

DM Policy 24: Tourism and Tourist/Visitor Accommodation (Reg 19 Policy E4 – Tourist Accommodation and Attractions)

In total 20 representations were made on this policy by 20 consultees. Representations were received from:

Name	Organisation	Comment ID
Mr Martin Brandon		DLP356
Derek Leach	The Dover Society	DLP3025
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1891
Kelly Lawrence	Deal Town Council	DLP2130
Ms Sarah Gleave	Dover and Deal Green Party	DLP2826
Katie Miller	Kent Downs AONB	DLP1493
Alan Byrne	Historic England	DLP1664
Mike Eddy	Walmer Parish Council	DLP2008
Katy Wiseman	National Trust	DLP1597
David Reid		DLP3507
Nicky Britton-Williams	Kent Wildlife Trust	DLP1517
	The Land Trust	DLP1944
Barbara Cooper	Kent County Council	DLP1740
Patrick Murfet	Bee Equipment Limited	DLP1180
Jason Ransley	Dover Harbour Board	DLP1232
Graham Hutchinson	White Cliffs Tourism Association	DLP3691
James Leah		DLP2069
Sue Ward		DLP3740
Julie Davies	CPRE	DLP3744
Mrs A Burnett		DLP3746

4 respondents stated that they agreed with the policy, 3 respondents stated that they objected to the policy and 13 respondents did not state whether they agree or object.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
It is essential that Dover rapidly develops a real sense of quality in Conservation Areas and Dover generally. Without effective implementation in these areas Dover will not make any progress. The effective countering of the A20 effect on tourism and Dover Town Centre is very important. Conservation work and effort should not be restricted to Deal and Sandwich.	Comments noted.
Is strongly welcomed. It promotes an expansion of good quality tourist facilities and contains paragraphs that deter changes that would result in a loss of services and accommodation.	Comments noted.
Remove “Town Centres” in relation to conference and exhibition facilities.	Conference and exhibition facilities need to have good access to public transport links and the town centres are considered more sustainable locations for larger scale hotels with such facilities, in order to coincide with the climate change agenda.
Has there been any effective measurement of the impact of tourism’s contribution to the local economy as suggested in para 7. 76 which refers to increasing the tourism contribution. How do you intend to quantify this impact?	The updated Economic Needs Assessment 2021 considers the District’s economic performance in relation to a number of sectors including tourism and hospitality. The Council will monitor the implementation of the policies in the plan, and other strategies including the economic growth strategy and tourism strategy to assess their impact on the economy moving forwards.
How will we incentivise new hotels?	The tourism policy is aimed to promote new hotels in order for the

	market to bring them forward. The Tourism Strategy is the Council's main tourism document.
The plan envisages an increase in visitor accommodation which includes camping sites and caravan parks but the requirements are too weak, such as protection for residents and landscape, compared with DM23, DM22 and DM18 which are much more robust. Should have no detrimental impact on the character of the landscape, be appropriate in scale to existing settlements and have no significant impact on living conditions of adjoining residents.	The policy will be updated to strengthen the wording and to be more consistent with the other policies referenced.
The White Cliffs Community Rail Partnership (WCCRP) was established in 2020 and it's disappointing that it's not mentioned in the tourism or the transport sections of the draft Local Plan.	The WCCRP is referred to within the Tourism Strategy.
Deal and Walmer Castles tend to be overshadowed by the popularity of Dover Castle which is one of the most visited sites in England. More needs to be done to encourage trips to out to Deal and Walmer as the rich cultural and historical heritage of both places is worthy of being more widely appreciated.	In addition to the Tourism Policy within the Local Plan and The Tourism Topic Paper, The Tourism Strategy 'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030' sets out further the Council's aspirations in relation to tourism.
Lack of toilets and coach parking facilities.	Improvements to overall tourist facilities through relevant applications is supported.
The cable car to the castle, and the cost to the public purse of both the feasibility study and the cable car itself are very unsustainable.	This is not addressed in the Local Plan. A feasibility study for the delivery of a cable car in Dover is being looked at by a different department in the council.
This policy is relatively permissive in terms of location and scale. It is recommended that a specific criterion is added to make it clear that large scale tourism and visitor accommodation will not be appropriate within the AONB. We would suggest that it be made clear that either holiday lets are not included within this part of the	This policy would be read in conjunction with other policies relating to the AONB, such as the Landscape Character policy which sets out

policy, or more specific criterion are provided, such as a requirement for such proposals being located within, or adjacent to, existing settlements.	requirements for the AONB.
What potential is there for new heritage-led tourism initiatives?	The Tourism policy sets out the criteria for tourism proposals, which would include those which are heritage led.
It is surprising that no regard has been given to Air BnB type businesses and this should be addressed.	Air BNB accommodation is subject to the same criteria as a residential dwelling as it does not fall within a hotel or leisure use class.
The National Trust supports the policy. As the owner and custodian of Langdon Cliffs and Foxhill Down which forms part of the Dover to Kingsdown Cliffs SAC, the National Trust are pleased the potential for harmful effects as a result of visitor pressure on the integrity of internationally protected sites within the district has been considered. We are increasingly concerned about the designated areas being damaged through trampling and path widths spreading by the increasing volume of visitors to the site.	Visitor surveys are being undertaken at the site to ascertain visitor numbers and a suitable strategy for the SAC.
We urge the council to ensure that tourism proposals benefit nature's recovery. Working in partnership with English Heritage, Wildwood and Paradise Park, we are in the process of building a display aviary at Dover Castle. This will function as an engagement and awareness tool throughout the chough restoration project, broadcasting to the hundreds of thousands of visitors to Dover Castle the significance of chough to the Dover area. We propose edits: "Proposals will be supported which deliver a high quality, sustainable tourism experience for visitors to the district, and ensure proposals benefit the local community, the natural environment and businesses. Tourism proposals will be supported where they: Contribute to increasing biodiversity within the district and engaging local people and tourists with nature."	Strategic Policy 17 – Green Infrastructure and Biodiversity places requirements on developments in terms of biodiversity.
It is suggested that the wording of this policy expanded to include support for proposals where this would involve the regeneration of the historic environment, and such assets are proposed to be brought back into an active use.	Strategic Policy 18 – Protecting the District's Historic Environment would apply to developments.
Agree in the main, would wish to have a chance to join in at the next stage as previously SE England Tourist Board vice-chairman I/c Research and Development.	Comments noted. All registered contacts at

	Reg 18 will be informed of Reg 19 consultation.
The County Council recommends that the policy includes reference to the significance of important routes within the District – these should be protected and promoted in line with KCC ROWIP policy and reference included regarding the need for sustainable accommodation to encourage visitors to use public transport and improved infrastructure for Active Travel during visits to area.	Policy DM 4 would apply to applications where this is addressed. There will be a list of cross cutting issues for each policy to highlight other policies to be applied.
Redevelopment of the Snowdown Park site would provide major opportunities for the rural economy, promoting diversification, sustainable development and economic growth. A mixed-use scheme at the site would be sustainable, resilient and embrace innovation in the district while also having the potential to support the Growth Strategy for Tourism.	This site is being considered for allocation in the Reg 19 Local Plan.
We welcome the recognition of the tourism industry as a major contributor to the local economy, and the measures identified in the new Visitor and Tourism Strategy 'Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030' to increase the number and length of stays. We support the positive approach of the criteria based DM Policy 24: Tourism and Tourist/Visitor Accommodation.	Comments noted.
I am happy to read you want our District to be a World Class Destination of choice for visitors both from the UK and abroad. I think the plan lacks a few items and issues which need serious consideration. The Cruise Liner industry is a significant growth area and we need to exploit it better, we must help it grow. Local planning needs to help local businesses involved in Tourism to develop a range of experiences throughout the year so that visitors want to stay in the District rather than just pass through. We need quality accommodation so that Cruise passengers stay in the District either before or after joining cruises.	The policy is designed to support high quality, sustainable tourism experiences and accommodation and there are criteria set out for these types of applications.
Golf is a significant contributor to the local economy, we support the proposals to encourage appropriate development which will enhance the visitor experience. Lack of 4 or 5 star hotels and supply of good quality accommodation.	Comments noted. The policy would support this type of accommodation and it is referenced as a specific need in the supporting text.
There are 3 Certificated Locations for touring caravans on Singledge Lane and these prove so popular from spring to autumn that they are frequently fully booked. All would be very badly affected by the increase in traffic as a result of the Whitfield Urban Extension, contrary to DM24.	The Whitfield urban extension was in the majority previously approved by the Core Strategy and Land Allocations Plan.

It is not clear if the final paragraph relates to all development or just Tourism Proposals. Given that such development may be located within the countryside development should be suitably located and not result in a detrimental impact on the area, be they visual, environmental, or traffic.	This is intended to apply to any application in order to safeguard against the loss of existing high quality tourist/visitor accommodation. The wording will be reviewed to make this clear.
Dover needs to maintain its history and share with the community, many families cannot pay to visit many of the historic attractions.	Commented noted.

Summary of Proposed Changes

- The policy will be updated to strengthen the wording with regards to landscape protection and to be more consistent with the other policies.

Employment Policies Regulation 19 changes to Policy names and titles

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 8 – Economic Growth</i>	<i>SP6 – Economic Growth</i>
<i>SP 9 – Employment Allocations</i>	<i>Replaced by individual site allocations policies in the settlement chapter</i>
<i>DM Policy 18 – New employment development</i>	<i>E1 – New Employment development</i>
<i>DM Policy 19 – Retention of existing employment sites</i>	<i>Merged with E2</i>
<i>DM Policy 20 – Loss or re-development of employment sites and premises</i>	<i>E2 - Loss or redevelopment of employment sites and premises</i>
<i>DM Policy 21 – Home working</i>	<i>E3 - Businesses Operating from a Residential Property</i>
<i>DM Policy 22 – Conversion or Re-build of rural buildings for economic development purposes</i>	<i>Merged with E1</i>
<i>DM Policy 23 – New employment premises in the countryside</i>	<i>Merged with E1</i>
<i>DM Policy 24 – Tourism and holiday accommodation</i>	<i>E4– Tourist Accommodation and Attractions</i>

Chapter 8 - Retail and Town Centres

In total 68 comments were made on the Retail and Town Centre chapter. A summary of the representations received and the council's response to these representations is set out below.

Representations on the Chapter

In total 13 representations were made on this chapter by 13 consultees.

Representations were received from:

Name	Organisation	Comment ID
Mr Nigel Wadey		DLP260
Mrs Sue Ward		DLP250
Robin Green		DLP588
Dr Raju Sakaria		DLP619
Mr Tim Taylor		DLP768
Sarah Gleave	Dover and Deal Green Party	DLP2827
Julie Davies	CPRE	DLP822
Brenda O'Neill		DLP845
Peter Mason		DLP3111
Barbara Cooper	Kent County Council	DLP1741
Mrs Penelope James	Dover and Deal Liberal Democrats	DLP1031
	Dover Town Council	DLP1172
Chris Shaw		DLP1205

There was not an option to select whether respondents agreed or objected when commenting in this section of the Local Plan Consultation on Objective software.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Dover town needs to be revived it is unclear that DDC has a plan for this. Deal was known for its independent shops, but that is no longer the case, and DDC needs a strategy to address this to stop it from losing its uniqueness.	Comments noted. The Strategic Policy for Dover Town Centre sets out the strategy for the town based upon the updated Retail and Town Centre Needs Assessment.
Dover Town Centre cannot be at the heart of the local community. If that community has been moved to Whitfield, Dover vacancy rates are above national average as a result.	
There is nothing in Dover Town Centre to attract visitors using the port. They would rather use Canterbury for obvious reasons.	
Would have liked more emphasis placed on improving local town centres - Dover in particular. Currently anyone living in Ash or Eythorne/ Elvington tends to travel to the north for their shopping, entertainment, eating out, social activities, fitness. That to me is a sad	

reflection on the current state of what could be an attractive town.	
Dover already has a large number of food outlets and takeaways, but insufficient good quality restaurants, which could attract outsiders.	
Lack of public toilets and services for coach tourists, unsustainability of cable car posturing, need for SMEs to provide zero carbon transport activities for visitors and day-trippers. Need in Dover for a cheap indoor hub for small start-ups such as that provided by the Co-innovation Centre at Stembrook. Dover Market around Market Square must be maintained and new stalls encouraged. Dover town spatially has much potential.	
Current access into the main shopping and leisure areas of Dover and Deal are usually made by car. Consideration for future connectivity to the Whitfield Urban Expansion Community Hub facilities and the Dover Fastrack Rapid Bus route may encourage a reduction in car travel.	
An innovative sports facility, such as an ice rink in Dover would be a major attraction.	
Please include my displeasure for the dire state of the toilets in Dover, closures, opening times and condition.	
Could we have a current picture of Dover Town? The highlighting of retail along with Town Centres does not reflect the new thinking needed to revitalise the urban centre particularly in Dover town. Retail is dying and we need to think differently to create Town Centres which pull in people and create employment opportunities. The Roman Painted House redevelopment is key to the future economic welfare of Dover.	Some of the photos will be updated for the Reg 19 plan. There are strategic policies within the plan for the town centres which are updated for the Reg 19 plan based upon the latest Retail and Town Centre Needs Assessment (Jul 2021).
The County Council welcomes the recognition of the offers of town centres and village centres in providing a balanced provision for communities. In terms of future strategies, we would support approaches to town centres that ensure that facilities can be accessed sustainably and would welcome the opportunity to work with the District Council to ensure that highway and transportation considerations are taken into account – including ensuring that sustainable transport options are prioritised as appropriate in the town centre. Ensuring town centres have the flexibility to meet changing demands and shopping patterns will boost the resilience of these centres in the long term. The County Council considers that it is likely that town centres will need to evolve to meet the changing needs of the community and this may include long term	Comments noted. The Strategic policies for the town centres aim to include flexibility to meet changing demands, shopping patterns and enable them to evolve to meet the changing needs of the communities they serve.

<p>changes resulting from a movement towards online retail and short term shopping and behavioural changes resulting from the COVID-19 pandemic – all of which are referenced within this Local Plan. Community facilities, delivered as multifunctional spaces, are particularly well placed to adapt to meet the changing needs of the community.</p>	
<p>Design of town centres must be pedestrian led, not car/van led. Town centres need to be sustainable, so creating any new out-of-town retail outlets needs to be discouraged. Public transport into town centres needs to be developed. More residential accommodation needs to be provided in town centres. It will ensure that town centres do not become "ghost towns" after 6pm and unsafe areas. Town centre residential developments should also include sheltered housing catering for the elderly/those with a disability, which are within easy walking distance to town centre or beside a good bus service.</p>	<p>Comments noted, the town centre policies aim to promote a range of suitable town centre uses, which include residential.</p>
<p>Deal has concentrated on its town centre and it is a delightful place to visit.</p>	<p>Comment noted and the Retail and Town Centre Needs Assessment provides evidence to demonstrate the success of Deal Town Centre.</p>
<p>The approach may need revisiting given the impact of COVID19 and lockdown on town centre shops and services, and rise of online deliveries. Deal Town Centre - paragraph 8.69: It is unclear what is meant in terms of improving connectivity to the seafront and would be concerned if this meant additional roads encouraging vehicular traffic.</p>	<p>Connectivity to the seafront means ensuring the public realm, signage and a range of town centre uses are enabling pedestrian flow to be directed between the town and seafront.</p>
<p>The Deal Society welcomes and supports the proposed extensions to Deal High Street designation. The independent shops at the north end of Deal High Street play a critical role in the economy of the town and have led the way in the reinvigoration of Deal town centre.</p>	<p>Comment noted. The Retail and Town Centre Needs Assessment (2021) has supported the new town centre boundary, which has reflected the way Deal Town centre has evolved since the Core Strategy.</p>
<p>Deal Town Centre - I support Option 2 to create a larger designated town shopping area. The high street is fragmented by traffic and redesign is required to mitigate this.</p>	<p>The Retail and Town Centre Needs Assessment has not identified any requirement to redesign the high street and concludes that it is functioning very well.</p>

Deal Town Centre is threatened by the congestion caused by over-development on the outskirts of Deal. Deal Town Council's report of June 2020 'Making Walking and cycling irresistible' is excellent and we fully endorse it. The plan for a 'Park and Pedal', scheme at Borrowpit Carpark Walmer is excellent. The Deal / Walmer road system will not cope if permission is given for any more developments.	Comments noted. The Retail and Town Centre Needs Assessment has not identified any issues from traffic congestion and concludes it is functioning well. Health checks of the town centres will be conducted regularly to monitor how well they are operating.
Need to protect the uniqueness of Sandwich Town Centre.	The Strategic Policy for Sandwich Town Centre recognises the need to protect and enhance the uniqueness of Sandwich Town Centre.

Representations on the issues identified

In total 7 representations were made on this section by 7 consultees.

Representations were received from:

Name	Organisation	Agent	Comment ID
Reverend Seth Cooper			DLP340
Mr Ross Miller		Masterton Robin Designs Ltd	DLP508
Mr Jamie Pout			DLP528
Bathan Garrity			DLP568
Mr Jason Jones Hall		Pioneering Places East Kent	DLP894
Mike Eddy	Walmer Parish Council		DLP2009
Kevin Bown	Highways England		DLP1809

5 respondents stated that they objected to the issues identified, 2 respondents did not state whether they support or object to the issues.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Village and local shops/parades were built before the time of high car usage, consider traffic calming and diverting plans, alongside improved pedestrian and cycle access experience to create new 'small' rail environments for local communities.	The retail policies do not include specific details on transport solutions, but encourage flexibility and diversity for changing needs and circumstances in the town, district and local centres.

<p>Lack of recognition that the global pandemic has significantly sped up the demise of the traditional high street with a significant move towards on-line purchasing that is unlikely to be reversed. Does not refer to recommendations from state of the high street reports published in the last few years. Future of town centres is as a social meeting and entertainment space and associated impulse/convenience retail opportunities and emphasis must be given to encouraging the following: Prime town centre areas - mix of restaurants, cafes, bars, entertainment venues & impulse/convenience retail with residential on upper floors. Secondary town centre areas - clubs, restaurants, cafes, speciality/independent retail all with residential above and possibly interspersed with high density residential properties. Need to identify a niche market/USP that makes them attractive to visitors.</p>	<p>The Retail and Town Centre Needs Assessment (Jul 2021) assesses the impacts of the pandemic on the town centres to date and this has informed the strategic policies for the town centres. The strategy for the town centres is to ensure that there is sufficient flexibility within the policies to allow for town centres to evolve and adapt whilst maintaining the town centre uses within the town centre boundary and primary shopping areas in accordance with the NPPF.</p>
<p>The focus of the town centre strategy is on traditional High Street uses, (retail, offices, bars, restaurants etc), despite growing evidence - and evidence of DDC Town Centres themselves - of diminishing demand for such uses. There is a growing body of evidence and initiatives - e.g. High Streets Task Force, Grimsey Reports, Future High Streets Fund - to support more innovative uses of town centres and high streets, including as community and cultural spaces, which is not reflected in the Local Plan or strategy. Proposed change - Para 8.14, lines 2/3 Add/amend: "... other types of development such as residential, offices, bars, restaurants, cultural and community uses as well as other leisure uses".</p>	<p>The RTCNA (Jul 2021) provides an updated assessment from the 2018 version to take into account the early impacts of the pandemic. The District and Local Centres policy sets out the criteria for proposals in these areas.</p>
<p>Given the recent pandemic, villages need local shops as locals want to be able to eat and shop locally. This data is already obsolete that has been used to focus this local plan. Local shops employ local people, allowing them to walk to work (good for areas that lack good transport links).</p> <p>Now that people want to shop locally due to the pandemic, villages should get more retail space. People want a variety of shops within walking distance and it should be provided in this plan.</p>	<p>The town centre boundaries will be reviewed at an early stage within the Local Plan period in order to assess any further additional impacts as a result of the pandemic, as it is</p>
<p>Generally, this Chapter has little direct relevance to Walmer Parish Council as it concentrates on the three principal shopping centres of Deal, Dover and Sandwich. It would, however, be prudent to review the boundaries of these three retail centres at the midpoint of the Plan (2030/31) given the apparent changing pattern of retail in the wake of a shift to online shopping.</p>	<p>The town centre boundaries will be reviewed at an early stage within the Local Plan period in order to assess any further additional impacts as a result of the pandemic, as it is</p>

	recognised there will likely be longer term impacts which may still emerge. The health of the town centres will be monitored annually as part of the monitoring indicators for each policy.
Highways England (See DLP1809 for full comment) would support the diversification of town centres to support retail needs and promote sustainable and active transport for shorter trips. Ensuring adequate parking provision within the town centre in line with standards would also be required.	Comment noted. Parking is addressed in the Parking Provision Policy of the Transport and Infrastructure Chapter.

Representations on the options identified

In total 2 representations were made on this section by 2 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP28
Ms Lesley Neil		DLP3214

1 respondent stated that they objected to the policy, and 1 did not state whether they agree or object.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Insistence on wooden stallrisers in current guidance needs to be changed to allow other materials such as brick, tile and stone which do not degrade in appearance so quickly.	The Guidance on Shop Fronts and Signage with Conservation Areas (May 2012) is programmed to be updated following Local Plan adoption.
8.53 - Wording misconstrues and misdescribes the role of Deal town centre within the district. Its shopping catchment is not just the resident population but attracts shoppers from a wide swathe of villages including those nearer to Dover & Sandwich. Wording needs to be revised to reflect this and describe Deal separately from Sandwich.	It is recognised that Deal attracts a wide range of visitors in addition to local residents. There is a separate Strategic Policy for Deal Town Centre and Sandwich Town Centre in the Reg 19 local plan.

Summary of Proposed Changes

- No proposed changes based on representations

Strategic Policy 10: Quantity and Location of Retail Development (Reg 19 Policy SP7 – Retail and Town Centres)

In total 8 representations were made on this policy by 8 consultees. Representations were received from:

Name	Organisation	Agent	Comment ID
Peter Jull			DLP29
Mr Martin Brandon			DLP357
Derek Leach	The Dover Society		DLP3026
Mr Ross Miller		Masterton Robin Designs Ltd	DLP509
Kelly Lawrence	Deal Town Council		DLP2137
Alan Byrne	Historic England		DLP1665
Kevin Bown	Highways England		DLP1811
Ms Sarah Gleave	Dover and Deal Green Party		DLP2828

2 respondents stated that they agreed with the policy and 3 respondents stated that they objected to the policy, and 3 did not state whether they agree or object.

Summary of Representations – Main Issues	
I support the 'Town Centre First' approach. I support retail needs being met through existing vacant premises in the primary shopping areas and through development opportunities identified in Dover Town Centre. We urgently need this to reinvigorate our town centres. The district has had far too much out of town retail development.	Comments noted. DM Policy 26 Sequential Test and Impact Assessment also sets out this approach in accordance with the NPPF.
The policy seems to aim to significantly reduce the position of Dover through actively promoting the expansion of space in both Sandwich & Deal which given the severe restrictions on space in those current town centres has the potential to significantly impact their integrity and setting and in the case of Sandwich its historic setting and context. It is important to facilitate appropriate growth of all 3 town centres according to their population growth this needs to be very carefully managed to avoid destroying the character of these conurbations.	There is a strategic policy for each of the 3 towns in the Reg 19 Local Plan, which seek to address the individual character and requirements of each town. SP10 will be amended to detail further the strategic approach to retail across the district based on the updated Retail and Town Centre Needs Assessment (Jul 2021).
Many of the Districts' towns and village centres are historic and contain distinctive character and many unique heritage assets. In considering the policies for regenerating such centres in the ongoing challenging environment, the Council should consider what role the historic environment can play in increasing the vitality and attractiveness of town and village centres.	
The Retail and Town Centre Needs Assessment 2018 identified that the quantum of space available for retail	Comment noted. The updated RTCNA (Jul

within the Town Centres was adequate and that there was no need to further allocate space for this use.	2021) also concurs with these conclusions.
Deal Town Council supports this policy.	Comment noted.
Any approach to Town Centre developments will be influenced by the growth of online shopping, magnified, perhaps permanently so, by the pandemic effect. The Plan should include research for better ways forward, including the use of external expertise and experience. The future will require a more imaginative approach.	Comments noted. The RTCNA (Jul 2021) included the context of the pandemic and was supportive of the retail policies and recommendations have been incorporated into the Reg 19 Local plan.
Summary of proposed changes to the map boundaries	
The primary shopping frontage in the vicinity of Flying Horse Lane and Fishmongers Lane needs to be adjusted. The bomb site at 11 King St, should be included to ensure that any development that does come forward even after 80 years of dereliction contains commercial use at ground floor level. Although the current planning application to redevelop this site offers commercial units at ground floor level that do not face King Street it cannot be justified including them within the primary shopping frontage with the restrictions that entails. Three sides of St. James' have been designated as primary shopping frontage but not the 4th. Is there not inconsistency in excluding the pub and commercial building on this side?	The town centre boundaries and primary shopping areas have been reviewed as part of the updated RTCNA (Jul 2021). Adjustments to the boundaries Dover have been made to make the primary shopping frontage an homogenous one.
Page 128, Map of Dover Strategic Plan Development Sites. The area of Stembrook Car Park should not be included. The full potential of tourism development and regeneration of the "Old Town" will require car parking in particular as most residential developments within the town area do not have car parking facilities and rely on car parks and on-street facilities. Page 129 Map of Dover Town Centre Boundary and Primary Shopping Areas. Accept the proposal. Page 130. (8.63) There should be an emphasis in developing cultural facilities. Page 130 (8.66) The statement "Proposed schemes that aim to achieve landmark buildings should be of demonstrably outstanding architecture" Words are good but how and who will ensure this is achieved.	The town centre boundary and primary shopping area has been reviewed as part of the updated RTCNA (Jul 2021). Small adjustments have been made to create continuous frontages. The policies for Reg 19 also include an implementation section which details how the policies are expected to be implemented.

Summary of Proposed Changes

- Town Centre boundaries will be reviewed prior to Regulation 19
- SP10 will be amended to detail further the strategic approach to retail across the district based on an updated Retail and Town Centre Needs Assessment.

Strategic Policy 11: Dover Town Centre (Reg 19 Policy SP8)

In total 11 representations were made on this policy by 11 consultees.

Representations were received from:

Name	Organisation	Agent	Comment ID
Mr Phillip Coleman			DLP57
Mr Rob Polden			DLP170
Derek Leach	The Dover Society		DLP3027
Mr Peter Wynn	Homes England		DLP285
Kelly Lawrence	Deal Town Council		DLP2138
Mr Mark Norcliffe			DLP599
Barbara Cooper			DLP1742
Ms Sarah Gleave	Dover and Deal Green Party		DLP2829
Graham Hutchinson	Whitecliffs Tourism Association		DLP3692
Kevin Bown	Highways England		DLP3723
Sue Ward			DLP3739

2 respondents stated that they agreed with the policy and 4 respondents stated that they objected to the policy and 5 respondents did not state whether they agree or object.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Don't waste money at Market Square, use that money to do up the shop fronts to improve the area.	The Market Square project is being taken forward by the council with specific regeneration project funding.
There should be a cable car linking the castle to the town centre in Dover. This would reduce road usage, eliminate seafront delays and add another attraction to the town that would promote tourists visiting the castle and the town.	This project is no longer being taken forward by the Council.
Figures for retail capacity in Dover suggest that there was too much comparison retail prior to the impact of Covid 19 which suggests there is a need to review capacity and manage decline in the retail role through repurposing and repositioning. Homes England support the Councils flexible approach but recommends a further review of retail capacity and the potential for further town centre housing.	The updated RTCNA (Jul 2021) supports the policy approach and recommends we actively monitor vacancy rates in the town in particular, which is included as a monitoring indicator for the policy. The policy supports a mix of appropriate town centre

	uses, which would include some residential use.
Reference is made to “protecting” heritage assets, but no mention of enforcement to ensure properties are maintained in a good state of repair and decoration and if not the appropriate use of Section 215 of the 1990 Town and Country Planning Act. There is no mention of The Crypt site or improvement in Bench Street. We would seek removal of any reference to Stembrook Car Park, which we assume would result in the closure of the only public toilet facility in the town centre. The effect on the Town Centre was ignored with the development of St James and Whitfield Business Park leading in part to its present state. The Plan needs to include an overall strategy for Dover with regular reviews and adaptations to changes in circumstances. We support Strategic Policy for Dover Town Centre with the inclusion of the word ‘quality’. The Plan notes “opportunities to enhance the public realm and improve connectivity in the town centre area have identified Market Square: along the section of the A20 corridor that runs through the town centre...” Should the A20 with its lorry traffic be part of the town centre?	Comments noted. The policy sets out a strategic approach to Dover Town Centre and includes some opportunity areas and is aimed to be flexible to meet changing retail circumstances. The Dover Town Centre boundary as proposed for the Reg 18 and Reg 19 plan does not include the A20.
It is disappointing that there is little recognition of, and focus upon, the most significant problem facing the Dover district – Dover town centre. The objective should be to create an appealing mix of modern retail and commercial premises, integrated with attractive apartments and housing, and interspersed with green spaces and cultural trails that link the town’s outstanding historical features.	This policy is specifically related to Dover Town Centre and sets out extensive principles and criteria for applications in order to address these issues.
There is a need for pleasurable, retail-browsing experiences; which means cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint. The Sunday farmers’ market could be tempted back all year round. Walking/cycling/driving along London Road could become a much more cheering experience if offers to create murals along the road were taken up. Urgent installation of public toilets needed.	Comments noted. The policy is aimed to be flexible to support changing retail experiences.
Deal Town Council supports this policy.	Comment Noted.
KCC considers that the text for Dover town does not fully acknowledge the role that the town’s heritage can play in supporting regeneration. If Dover is to become the vibrant, attractive place to live in and visit that is sought, it will be important to bring to the forefront all the town’s strengths. These certainly include Dover’s heritage. These heritage assets have the potential to	Amendments will be made to the policy to further strengthen Dover’s heritage as recommended.

<p>greatly enhance the attractiveness of the town and make it a destination of choice for visitors as well as a place that residents can enjoy living in. The County Council recommends that Strategic Policy 11 be amended to include the following: “Recognising the rich historical landscape in the town and ensuring that proposals conserve and enhance the significance, connectivity, public access, setting and character of these important Heritage Assets. Particular regard should be made to Supplementary Planning Document Dover Town Archaeology (forthcoming).”</p>	
<p>Opportunities have been identified at Market Square, along the A20, where works are being undertaken to improve both providing a flexible space for public events, seating and pedestrian movement in the area, a local focal point. While further design guidance will be utilised within Strategic Policy 11, it is noted that a balanced approach will be taken between sustainable transport modes and car parking provision to encourage more active modes of movement to the town centres.</p>	<p>Comments noted.</p>
<p>Pleased that the Market Square of Dover is going to be transformed but I do not see within the plans the eyesore which is Townwall street to the West of the St James Retail park. The Roman Painted House hardly gets a mention, it could be a major international attraction. Dover has virtually no toilets, disabled facilities should be adequately provided. Dropped kerbs and pathways are in the wrong place and uneven. There should be better provision of bins and recycling in the towns and drinking water points.</p>	<p>The policy includes provision for improvements to the public realm to cover some of these concerns in addition to other policies within the plan such as SP2 – Planning for Healthy and Inclusive Communities and DM36 – Achieving High Quality Design and Place Making, which would also address these concerns. The Cross Cutting Issues Section of each policy will highlight other appropriate policies which also apply to applications.</p>
<p>Dover has an aging population which needs ready access to facilities by public transport, which means regenerating the town centre, not by creating a vast new town at Whitfield. The focus is far too much on Whitfield to the detriment of Dover town. Even such wonderful attractions as the Roman Painted House and the Castle are vastly under-promoted. Most people drive straight past Dover up the A2 or A20 and who can blame them.</p>	<p>It is considered that the strategic policy specifically for Dover Town Centre will be a key policy in driving forward the Council’s aspirations for Dover. The policy sets out extensive criteria in order to guide proposals</p>

	in contributing to the regeneration of the town.
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Summary of Proposed Changes

- Amendments will be made to the policy to further strengthen Dover’s heritage

Strategic Policy 12: Deal and Sandwich Town Centres (Reg 19 Policies SP9 and SP10)

In total 11 representations were made on this policy by 11 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP30
	Deal and Walmer Chamber of Trade	DLP90
Ms Fiona Le Ny		DLP165
Reverend Seth Cooper		DLP341
Derek Leach	The Dover Society	DLP3028
Ms Sarah Gleave	Dover and Deal Green Party	DLP2830
Kelly Lawrence	Deal Town Council	DLP2139
David Reid		DLP3509
Barbara Cooper	Kent County Council	DLP1743
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3323
Kevin Bown	Highways England	DLP3724

4 respondents stated that they agreed with the policy, 2 respondents stated that they objected to the policy and 5 respondents did not state if they agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
8.34 is incompatible with the map in that it states St. George’s Road is to be included within the town centre boundary. Apart from have a function in applying the sequential test to developments including town centre uses outside of the boundaries it is not clear whether the boundaries have any other policy function. All main town centre car parks in Deal are included within the boundary apart from West Street which appears inconsistent. Large parts of the Middle Street conservation area where street frontages are entirely residential or predominantly so are included within the boundary without explanation.	The Deal Town Centre Boundary on the town centre map will be reviewed and will be updated for the Reg 19 Local Plan. It has been reduced in size to take out some residential streets to the North East of the town.
The proposed town centre boundary for Deal includes too many roads or parts of roads that are	

entirely residential and do not function as part of a central business district. A church is described as a town centre use but St. George's Church is excluded. The text references the inclusion of St. George's Road but the map doesn't and it shouldn't be. All town centre car parks are included apart from West Street which is inconsistent.	
I think this is all good, except that already pre-Covid some shops had closed, and now there are likely to be even more. I would like to suggest some changes. 1) Reduce business rates of physical shops to bring them into line with Amazon etc. 2) You need to especially prioritise investment in small local shops. 3) For shops which really can't re-open, the council could turn them into low-cost flats. 4) To make Deal town centre much more attractive, bring back the Saturday pedestrianisation.	Some of these suggestions are outside the Local Plan remit. The Strategic Policies for the town centres set out the strategies based on the evidence within the RTCNA (Jul 2021)
Agree.	Comment noted.
No comments.	Comment noted.
Both of these compact centres would benefit from '20 is plenty' policies being introduced. Protect the retail streets that exist. A strong case exists for incentivising / cutting business rates for independent, innovative start-ups especially those allowing residents to reduce their carbon footprint (zero-waste / re-fill shops, cycle + skate repair stores, up-cycling stores, plant swap-shops, etc).	The Primary Shopping Areas have been identified to protect the core shopping areas and the town centre boundaries identified for wider town centre uses in accordance with the NPPF.
DTC supports this policy.	Comment noted.
Agree the extension of town centre boundary but insist the conservation areas MUST be observed and where possible extended to further the Historic 'look' of our town. Agree we should attempt to increase the percentage of accommodation, especially for the elderly/retired in the town centre and on the most frequent bus routes into town.	Comments noted. A review of the Conservation Areas is not proposed as part of the Reg 19 submission.
Paragraph 8.68 - KCC welcomes the commitment to the historic environment in this paragraph.	Comments noted. The historic environment forms a key part of the character of the town centres and is recognised within the strategic policies for the town centres.
We welcome the proposal for a primary shopping area for Sandwich town centre as too many retail properties in Sandwich have been converted to residential use and this has destroyed the integrity of the core shopping area. We welcome the proposal to prevent further such conversions	The strategic policy for Deal and Sandwich will be separated out for each town and the primary shopping area has been designated based upon the updated

within the primary shopping area but the plan should include provision to ensure that this proposal is absolutely legally enforceable and also to allow for properties that have been converted to residential to be converted back to retail over a period of time. This could include provision for compensating owners if there is a gap between the prices that can be achieved for retail over residential uses.	Retail and Town Centre Needs Assessment (Jul 2021) and officer site visits and assessments. The policies need to comply with the NPPF and it is not considered the proposed suggestion would be compliant.
Highways England supports development and concentration within the town centre to promote sustainable uses. SP 12 supports the principles to place Deal and Sandwich town centres in the heart of the communities. New development will be expected to make a positive contribution in terms of mix land uses in the town centre and enhance connectivity.	Comments noted.

Summary of Proposed Changes

- Separate strategic policies will be created for Deal Town Centre and Sandwich Town Centre and be bespoke for the individual considerations for Deal and Sandwich.
- Deal boundary will be reviewed

DM Policy 25: Primary Shopping Areas (Reg 19 Policy R1)

In total 4 representations were made on this policy by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3029
Kelly Lawrence	Deal Town Council	DLP2141
Mike Eddy	Walmer Parish Council	DLP2014
Shelley Morris		DLP3253

2 respondents stated that they agreed with the policy, 2 respondents suggested amendments and 1 respondent was not in agreement with the policy in the context of Sandwich Town Centre.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
In principle, generally supportive of this policy, there should be a condition to “retain and enhance buildings within Conservation Areas”. Upper floor conversions to residential must comply with “Technical housing standards –	Detailed design guidance on Shop fronts, signage and shutters will come forward as part of the Design Codes. Cross reference to other relevant

nationally described space standards” in order to stop the current delivery of “shoe box” accommodation in upper floor conversions. There is no reference to detailed guidance on Shop Fronts, Signage and Shutters within Conservation Areas. If DM 28 Shop Fronts is adequate, then reference of this should be made in DM 25. DDC owned town centre car parks could run along the lines of the St James car park with free parking for 1 hour.	policies will be made in the Regulation 19 version of the plan. It is not within the remit of the Local Plan to stipulate parking fees.
DTC supports this policy. Support the need for a Retail and Town Centres Needs Assessment before the adoption of the draft Plan. Support the proposed extensions to the Town Centre boundary. Support not permitting change of use to ground floor retail uses. Welcome the recognition that the whole of Deal High Street lies within a conservation area and that has implications for shop signage.	Comments noted.
Proposed Amendment - Add to DM25, “The boundaries of the three primary shopping areas will be reviewed at the midpoint of the Plan’s life time in order to take account of changes to the retail sector.”	Given the context of the pandemic, the monitoring indicators for the policy will include regularly monitoring of the health of the town centre and primary shopping areas, so it is not necessary to add this wording into the policy.
Proposals to radically alter Sandwich Town Centre as ‘a primary shopping area’ is out of step with the ethos of the town.	Without a designation, there would be no protection of any retail uses within the town centre, which could convert to residential uses and erode the town centre.

Summary of Proposed Changes

- No proposed changes based on representations but further review will be undertaken of the primary shopping area boundaries prior to Reg 19.

DM Policy 26: Sequential Test and Impact Assessment (Reg 19 Policy R2)

In total 5 representations were made on this policy by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3030
Kelly Lawrence	Deal Town Council	DLP2142
Mike Eddy	Walmer Parish Council	DLP2016
Lee Evans Partnership	The Land Trust	DLP1945

Jason Ransley	Dover Harbour Board	DLP826
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3 respondents stated that they agreed with the policy, 1 respondent did not fully understand the policy and 1 respondent proposed additional wording for the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
No comment as not fully understood.	Comment noted. The RTCNA goes into further detail about the sequential test and its requirement based upon the NPPF.
DTC supports this policy.	Comment noted.
Policy DM 26 which is relevant to Walmer Parish council is acceptable.	Comment noted.
The wording of the policy should potentially be expanded to include the sentence “or if there are no material considerations that would otherwise justify such a location”. This policy should essentially seek to incorporate flexibility in the wording to allow for individual site circumstances to be taken into account.	This policy needs to meet the requirements of the NPPF and this proposed change would not be in accordance with paragraphs 87-91 of the NPPF.
We support the objectives of this policy. We request that the policy recognises that in locations (such as Dover Waterfront) where there is already a significant amount of floorspace in retail and town centre uses, proposals for the development/reprovision of equivalent floorspace for such uses will not be required to satisfy the Sequential Test requirements of DM Policy 26.	There will also be specific employment site policies which will contain more detail for site specific considerations. It is not proposed to further amend the sequential test policy to allow exceptions, as it is considered this would not comply with the NPPF.

Summary of Proposed Changes

- No proposed changes based on representations

DM Policy 27: Local Centres (Reg 19 Policy R3 Local Shops)

In total 3 representations were made on this policy by 3 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3031
Kelly Lawrence	Deal Town Council	DLP2143
Mike Eddy	Walmer Parish Council	DLP2017

2 respondents stated that they agreed with the policy, no respondents stated that they objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
No comments	Comment noted.

DTC supports this policy	Comment noted.
Policy DM 27, which is relevant to Walmer Parish council is acceptable.	Comment noted.

Summary of Proposed Changes

- No proposed changes based on representations

DM Policy 28: Shop Fronts (Reg 19 Policy R4)

In total 4 representations were made on this policy by 4 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	The Dover Society	DLP3032
Kelly Lawrence	Deal Town Council	DLP2144
Mike Eddy	Walmer Parish Council	DLP2018
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3324

3 respondents stated that they agreed with the policy and 0 respondents stated they objected to the policy.

Summary of Representations – Main Issues	
Currently DDC have “Guidelines” with detail of requirements for shop fronts within conservation areas including signage and shop security grilles. Policy DM 28 requires the addition of signage to enhance Conservation areas where currently inappropriate vinyls have been displayed. Shutters should not be the roll type but the open grille type that provides a better visual impact.	The Guidance on Shop Fronts and Signage with Conservation Areas (May 2012) SPD is programmed to be updated following the Local Plan adoption. It is considered that the more detailed design issues and guidance would be best placed within the SPD rather than the Local Plan policy. It is acknowledged that the open grilles provide a better visual impact and this will be set out within the supporting text of the policy.
We support this policy. It should be strengthened to include a preference for bespoke, traditional signage rather than mass-produced cladding signs, especially within the primary shopping areas.	
DTC supports this policy	Comment noted.
Policy DM 28, which is relevant to Walmer Parish council is acceptable.	Comment noted.

Summary of Proposed Changes

- Further emphasis will be made in the policy for a high standard of design for shopfronts, canopies, blinds, shutters and other security measures.

Retail and Town Centres – Regulation 19 changes to Policy names and numbers

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 10 – Quantity and Location of Retail Development</i>	<i>SP7 – Retail and Town Centres</i>
<i>DM Policy 25 – Primary Shopping Areas</i>	<i>R1– Primary Shopping Areas</i>
<i>DM Policy 26 – Sequential test and impact assessment</i>	<i>R2 - Sequential Test and Impact Assessment</i>
<i>DM Policy 27 – Local Centres</i>	<i>R3 – Local Shops</i>
<i>DM Policy 28 - Shopfronts</i>	<i>R4 – Shop Fronts</i>

Chapter 9 - Transport and Infrastructure

Note that within this chapter summary the comments made on the introductory supporting text and SP13 – Infrastructure and Developer Contributions have been grouped together. In addition, comments that were made which were more suited to be located under a specific section / policy have been summarised and responded to within that section. This is to ensure the infrastructure topic area and issues raised could be dealt with in one location in this report and avoids duplication in the proposed responses.

Representations on the Chapter introduction

In total 25 representations were made on this chapter introduction, by 21 consultees.

Representations were received from:

Name	Organisation	Comment ID
	Deal and Walmer Chamber of Trade	DLP86
Ms Fiona Le Ny		DLP160
Mr Nigel Wadey		DLP261
Mr Tracy Hawkes		DLP808
Dr Raju Sakaria		DLP620
Mr Tim Taylor		DLP769
Julie Davies	CPRE	DLP824

Miss Laura Fidler	Town Clerk Sandwich Town Council	DLP948
N. Warden	Kent Tree and Pond Partnership -Dover District	DLP2200
Rosie Rechter		DLP944
Zoe Holmes	NHS Kent and Medway Clinical Commissioning Group	DLP1000
Ms Penelope James	Dover and Deal Liberal Democrats	DLP1011
Mr Chris Shaw		DLP1206
Derek Leach	The Dover Society	DLP3033
Ms Sarah Gleave	Dover and Deal Green Party	DLP2831
Barbara Cooper	Kent County Council	DLP1744
Cllr Peter Walker	DDC WARD - Aylesham, Eythorne and Shepherdswell	DLP2039
Carolyn and Trevor Bond		DLP2303, DLP2305, DLP2300, DLP2304
Kim Horwood		DLP3478
Mrs Burnett		DLP3719
Stephen Mason		DLP3115
Mrs Emma Doherty		DLP1273

Representations on the issues identified

In total 10 representations were made on this section by 10 consultees.

Representations were received from:

Full Name	Organisation	Comment ID
MR William Donaldson		DLP134
Ms Fiona Le Ny		DLP157
Mrs Sue Ward	British Horse Society	DLP278
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1893
Linda Mason	Kent Police	DLP1532
Barbara Cooper	Kent County Council	DLP1745
Kevin Bown	Highways England	DLP1805
Kelly Lawrence	Deal Town Council	DLP2132
Mr Philip Abbott		DLP2193
Mike Eddy	Walmer Parish Council	DLP2019

3 respondents stated that they agreed with the issues, 1 respondent stated that they objected to the issues identified and 6 neither supported nor objected with the issues raised.

Representations on the options identified

In total 9 representations were made on this section by 9 consultees.

Representations were received from:

Full Name	Organisation	Comment ID
Peter Jull		DLP34
Anonymous		DLP2773
Barbara Cooper	Kent County Council	DLP1746
Mr Jonathan Simmons	Nonnington Parish Council	DLP2770
Mr Russell Thompson		DLP2605
Kevin Bown	Highways England	DLP1806
John Symonds		DLP2642
John Pugh	Stagecoach South East	DLP3163
Diana Osborn		DLP3198

1 respondent stated that they agreed with the options and 6 respondents stated that they objected to the options identified and 2 neither supported nor objected.

Strategic Policy 13: Infrastructure and Developer Contributions (Reg 19 Policy SP11)

In total 26 representations were made on this policy by 25 consultees.

Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP36
Mr Ross Miller	Masterton Robin Designs Ltd	DLP510
Mr Jamie Pout		DLP529
Bethan Garrity		DLP570
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1895
Planning Department	Canterbury City Council	DLP1507
Mr Kevin Lynch	Sholden Parish Council	DLP1870
Mr Alan David Steggall		DLP1229
Miss Laura Fidler	Town Clerk Sandwich Town Council	DLP1827
Katie Razzell	Aylesham Parish Council	DLP1934, DLP1936
Chris Johnson	Avison Young on behalf of National Grid	DLP1688
Seb Willett	Langdon Parish Council	DLP1253
Anna Woodward	Network Rail	DLP1686

Cllr Edward Biggs	DDC Ward Councillor DDC WARD - Town and Castle	DLP1997
Cllr Pamela Brivio	DDC Ward Councillor DDC WARD - Tower Hamlets	DLP1804
Derek Leach	The Dover Society	DLP3034
Jo Hygate	Kingsdown and Ringwould C of E Primary School	DLP2962
Ms Sarah Gleave	Dover and Deal Green Party	DLP2832
Diana Mouzakititis		DLP3258
Kevin Bown	Highways England	DLP1778
Mr Kevin Lynch	Worth Parish Council	DLP1856
Barbara Cooper	Kent County Council	DLP1747
Kelly Lawrence	Deal Town Council	DLP2133
Mike Eddy	Walmer Parish Council	DLP2020
Rob Nicholas		DLP3210

2 respondents stated that they agreed with the policy, 6 respondents stated that they objected to the policy and 18 neither agreed nor objected.

Summary of representations and Council's response

A summary of representations made on the above sections and the Council's response can be found in the table below. They have been grouped into topic areas. Please note that some comments referred to in this section, may have been originally made against other areas of the plan such as against site specific policies.

Summary of Representations – Main Issues	Council's Response / Proposed Changes
Education	
Schools need to be local to promote walking and reduce traffic build up	KCC Education are a statutory consultee and have been involved in the early stages of plan making and will continue to be involved through site selection during Reg 19. They will address the needs for each school / catchment areas based on growth and feedback requirements through the discussions.
The former Aylesham secondary school now a business hub?	
Greater investment required in adult training and education.	
The shortage of school places in Deal has been highlighted a number of times recently when planning applications were considered. The solution proposed was s106 payments to increase capacity of Dover selective and Sandwich non-selective schools.	

<p>The Langdon Primary School currently has 91 pupils in attendance, the majority of whom travel into the village from outlying parishes. The additional build of new housing will increase the need for extra pupil places which KCC will have to address. This raises the question as to whether or not KCC would increase classroom provision on the Langdon site or encourage a transfer to the new school site at Whitfield, which would increase carbon-footprint travel.</p>	<p>Where new schools are required on-site, these will be identified within the site specific policies and within the IDP.</p>
<p>Kingsdown and Ringwold Preschool and Primary school have concerns about housing growth in Kingsdown as the school is already full to capacity in the majority of year groups. As a result there would not be space for new families moving into the new houses initially. None of the routes into the village have pavements, so children walking into the village from either of the developments would have to walk on the road. This is a safety issue.</p> <p>On a positive side Further housing will ensure preschool and the primary school run at capacity, which ensures long term future stability. It is likely that the catchment area for the primary school will reduce. If this is the case there should be less cars coming into the village. Traffic around the village will also be eased when the preschool moves up onto the school site, as there will not be the double drop off for many of the families.</p>	<p>All other major developments will pay contributions to KCC for Education (including adult education) through application of this policy into s106 agreements. Specific requirements for each school will change annually depending on intake, and KCC will assess this when agreeing the required contributions.</p> <p>With regards to sustainable travel, this is addressed elsewhere within the plan, but safe travel to schools and other services is an important consideration.</p>
<p>Traffic Management</p>	
<p>Despite now getting an additional 20,000 extra vehicle journeys through the Nonnington, as a result of the new Aylesham Development, the village has received no traffic calming funding at all, despite assurances this would be delivered.</p>	<p>KCC Highways and Transportation are a statutory consultee and have been involved in the early stages of plan making and will continue to be involved through site selection during Reg 19. They will address the needs for each site allocation / settlement.</p>
<p>Increase the number of speed cameras around Deal and Dover.</p> <p>Increased traffic management is needed.</p>	
<p>The increased number of home deliveries, encouraged by Covid lockdowns, have put pressure on the road network.</p>	

<p>Working from home is also likely to produce more short local trips, however reduce the longer once a day travel.</p>	<p>Where local traffic management solutions are required these will be identified within the site specific policies.</p> <p>In addition, policy DM29 will require new developments to provide evidence of access and transport movements and travel plans / transport assessments in some cases where mitigation will be secured by S106 agreement.</p>
<p>Speed limits of 20mph should be implemented near schools and in built up areas. Implement a 20 mph speed limit throughout the village of Aylesham.</p>	
<p>Road improvements to separate local traffic from through freight traffic must be done to save lives.</p>	
<p>Sustainable modes of transport (Walking, Cycling, Bus, Rail etc)</p>	
<p>KCC (1744) have commented that the document is relatively silent on the emerging Dover Fastrack project (formally known as Dover BRT). It is essential that this extremely important project is reflected in specific policy requirements relating to:</p> <ul style="list-style-type: none"> • Identified routes that should be secured within the Whitfield/Dover areas that are safeguarded for the provision of Fastrack infrastructure. • Funding requirements of bus services and off-site infrastructure (potentially within the Infrastructure Delivery Plan). • Provision of on-site highway routes and complimentary infrastructure. • Requirements in relation to development phasing and an active policy to avoid ransom between different phases of development. 	<p>Proposed change It is agreed that the Dover Fastrack project should be specifically referenced within the plan and the IDP.</p> <p>The issue around ransom between phases will be addressed in the site-specific policy for Whitfield.</p>
<p>Various comments made relating to the provision of walking, cycling and bus travel in this chapter including:</p> <ul style="list-style-type: none"> • developments must focus on pedestrian and cycle traffic and improvement of train and bus services appropriate to the size of the village • A pelican crossing on the A258 at Ringwold village would greatly facilitate safe use of bus stops and increased cycle/foot path use. 	<p>Sustainable Travel policy DM4 includes requirements for cycling, walking and other active travel methods.</p> <p>Kent Highways and Transportation, Stagecoach, Network Rail and KCC PRow organisations have been consulted on the plan, and will be consulted on site</p>

<ul style="list-style-type: none"> • Within the URBAN area of Dover public transport services should be replaced with all electric buses. • Chapter needs policies on walking and cycling. • Established convention states that all homes should be within a 400 metre walking distance to a bus stop. 400 metres should be seen as a maximum, not an arbitrary figure or minimum standard. The longer the walk to to/from the bus stop, the less likely people will use the bus • Build more pedestrian crossings • Build cycle lanes separated from the traffic, and make sure they are maintained! • There need to be buses between Dover and Deal in the evening. • There is no bus service at present linking Aylesham and Dover. For Aylesham there is only a bus service to Canterbury (and not dover as the local plan states). • prioritisation of pedestrians and cyclists should be accelerated. • The plan should include policies to promote and support initiatives such as: Car club : short-term car rental services that allow members to locally parked cars and pay by the minute, hour or day. Public bicycle hire scheme, such as in London. • active safe travel routes need to be at the heart of the strategy, rather than a desirable add-on. • Access to buses in rural areas is inadequate. • Provision of high quality shelters at bus stops needed. Their locations should be determined at the masterplanning stage, and funding secured to maintain them. • Bus services should be better integrated with the rail service timetables • Public transport access to employment and retail sites is also critical. Development sites remote from the public transport network should not be permitted. Retail developments should be designed in such a way that public transport access to premises is at least as good, if not better, than access by car, to discourage car use. Long walks 	<p>specific policies and any related requirements prior to Regulation 19.</p> <p>Any specific site or area requirements recommended for sustainable transport, including infrastructure such as bus stops will be included in the plan and the IDP where relevant.</p>
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<p>across car parks to and from bus stops should be avoided.</p> <ul style="list-style-type: none"> • Both the bus services and train service to Aylesham is completely substandard. This needs to be addressed in the LP. • Bus related infrastructure should be put in place before any homes are occupied. This is particularly important in large scale sites with multiple developers involved. Some control needs to be exercised over the order in which individual parcels of land are developed. • Developers should be contributing to improvements to both bus and train services. • All new roads in a large development should create a pedestrian walkway at the back of new properties where services are laid under -rather than in the public roads • The LP highlights the need to upgrade key routes but must also be made desirable to cyclists and pedestrians alike. • The National Cycle Route 16 passes alongside the village on Ratling Road. Currently, there is only one cycle path in the village which does not connect directly onto this national route. • Enhancement of the network of walking and cycling routes promised in Chapter 3 will include installation of engineered, protected dutch style cycles paths, improvements of junctions in towns across the district especially near rail stations, and integration of cycle paths 1, 2, 15, 16 and 17 with all these 9 rail stations and 3 bus stations, and, trains and buses on these routes must carry (electric + cargo) bikes. 	
<p>Concerns raised that Horse riding and PROW are not covered adequately:</p> <ul style="list-style-type: none"> • Public rights of way should be protected as well as open space, but there is no mention of them. • British Horse Society is concerned about the lack of consideration given to Public Rights of Way (PROWs) No reference to equestrian users in the Plan. See DLP278 for full comments. 	<p>This issue of PROW has been addressed in the Sustainable transport policy.</p> <p>Proposed change – ProW will also be specifically included within the supporting text to explain that such details will be required in Transport assessments and travel plans in the Policy.</p>

<ul style="list-style-type: none"> • The PRow network and the ROWIP must be considered within this section. Investment in the existing network, inclusion of PRow opportunities in Travel Assessments and Travel Plans must be considered within a separate PRow policy (KCC 1744) 	
<p>Various comments relating to rail infrastructure:</p> <ul style="list-style-type: none"> • Train fares are too high. • A number of train stations are inaccessible to those in wheelchairs or with push chairs etc. • We recommend DDC and KCC work to impress upon Network rail that their wholesale felling along rail lines should be substantially scaled back and should only ever be done in Dec /Jan. • Query the likelihood of reduced journey times on HS1 to London. It is not clear how this would happen. Would it require missing out stations that are closer to What does increased capacity mean more frequent services and/or longer trains. Is this feasible? Longer trains means longer platforms cost of provision, and additional rolling stock? • In relation to SP 13 a new section needs to be added to the effect that the rail stations in the district are (HS1 Line Ashford - Ramsgate) Dover Priory, Martin Mill, Walmer, Deal, Sandwich, and (Dover - Canterbury East - Victoria line) Dover Priory, Kearsney, ShepherdsWell, Snowdown, Aylesham. • From a marketing perspective under 1 hour would be ideal however, with the increased volumes now using Folkestone West this would now seem most unlikely to achieve unless there was a track improvement • The HST1 has not maximised Dover Priory station as there is limited parking. 	<p>Comments are noted.</p> <p>Network Rail are a statutory consultee and have been consulted throughout the plan making process.</p> <p>Where they have suggested improvements to rail infrastructure or with regards to accessibility, these will be included within the IDP.</p> <p>The tree felling issue is not a Local Plan matter.</p> <p>The supporting text will be updated to include details of the rail stations in the district.</p> <p>The Dover Priory car parking issue will be addressed in policy.</p>
<p>Network Rail have looked at each of the stations on the Canterbury East Line in relation to the development proposed through site allocations in the Draft District Plan and make detailed comments in relation to these.</p>	<p>Comments are noted, and suggested projects have been included within the IDP and where relevant, site-specific allocation policies.</p>

<p>Network Rail Strategic Planning have been working on the North & East Kent Connectivity Study. This is the next generation railway industry modular strategic plan for the North and East Kent area.</p> <p>The amount of growth planned in the district will have an impact on railway infrastructure including the capacity of individual stations. Developments will be expected to mitigate the impact by funding improvements through CIL or S106 contributions.</p>	
<p>Water and drainage</p>	
<p>The drainage infrastructure has not kept up with housing developments, and climate change has led to heavier rainfall.</p>	<p>Southern Water is a statutory consultee and have been consulted throughout the plan making process.</p>
<p>For Deal's combined sewer system, the capacity is no longer sufficient, yet DDC consistently breaches NPPF paragraph 163 by permitting developments without any consideration to drainage infrastructure. Furthermore, DDC has failed to apply a "no occupation until foul drainage issues resolved" planning condition for new developments. This is in breach of legal precedent set by <i>Barratt Homes vs Welsh Water</i>.</p>	<p>Where they have suggested improvements to foul drainage infrastructure these will be included within the site-specific policies and the IDP.</p>
<p>Water supplies, sewage outflows will need assessment before any development is granted to ensure the current and future capacities will cope with the increase in demand</p>	<p>The issue relating to Deal and the SFRA will be explored further during Reg 19 preparation.</p>
<p>The SFRA report fails to mention that Albert Road is the major route to the treatment plant, and that most new upstream developments eventually feed into this sewer. This is a serious omission of a major flood risk for Deal. See rep DLP620 for further comments on the SFRA in relation to Deal.</p>	
<p>The inadequacy of the Worth raw sewage system has been an historic problem in Worth and it cannot cope with further houses being built on this scale without prior major investment in the raw sewage systems.</p>	
<p>Health and wellbeing / Community</p>	
<p>Young adults need activities to keep occupied and promote healthy living, youth clubs need to be modern.</p>	<p>Comments noted.</p>
<p>Provision of services (health and education) is covered by the vague phrase that the Council will continue to work with relevant service providers.</p>	<p>Infrastructure provision within Policy SP13 includes all types of infrastructure and services to meet the needs of communities. This will</p>

<p>Highways England supports the need to provide community services at the heart of new development and decision making. Facilities should be well served and connected to public transport and active transport modes to serve all residents and users.</p>	<p>include health and community infrastructure.</p>
<p>Lack of local employment and medical facilities. This will lead to increased traffic and resultant air pollution and greenhouse gas emissions.</p>	<p>Proposed change – Health and community infrastructure, along with a list of other infrastructure types covered by the policy will be included within SP13 supporting text.</p>
<p>There is no reference to health either as an infrastructure requirement or as a community facility. It is important that this be included somewhere please as it is essential that capacity is created to cope with additional demand from increased housing numbers. The CCG will continue to request S106 contributions against developments in order to mitigate the impact of the additional housing.</p>	<p>The IDP which will support the Local Plan Regulation 19 plan will be produced and consulted upon with the relevant providers, including the CCG/NHS and local community organisations where relevant (for example to address the need for community facilities such as village halls).</p>
<p>There is need for medical staff (doctors, nurses and dentists) to serve existing residents let alone new residents.</p>	
<p>Existing GP practices are experiencing difficulty in recruiting new doctors to the area. It is unclear how the plan will respond if there is insufficient medical staff: doctors, nurses, dentist to serve the population. The 2018-based ONS sub-regional population projections for the district estimate that the 65 and over population will both grow in number, from 28,260 in 2020 to 40,938 in 2040, and in percentage terms rise from 23.6% of the total population in 2020 to 29.4% in 2040. This will have implications for medical provision.</p>	
<p>Hospital provision in East Kent will not support the 12000 new homes within the plan. Deal residents will still have long journeys to Ashford Canterbury or Margate for many of their hospital needs.</p>	
<p>Waste & Recycling</p>	
<p>The County Council would like to see the following paragraph included the heading What are the key issues to consider? on pages 140/141: Waste Infrastructure KCC as the Waste Disposal Authority, operates a network of 18 Household Waste Recycling Centres (HWRCs) and 5 co-located Waste Transfer Stations (WTSs) and</p>	<p>PROPOSED CHANGE – The proposed wording is too detailed for the Local Plan policy itself and not required. However a reference will be made to waste infrastructure in the implementation</p>

<p>demand on these sites is at unprecedented levels. In Dover, KCC operates 3 HWRCs; Whitfield, Deal and Richborough where the public can take their household waste. Until recently, the Whitfield facility was also used as a WTS where kerbside collected waste from the whole of Dover District was taken. Kerbside collected waste is now taken to a separate mercantile facility within the District. There is a need to ensure that these waste facilities have sufficient capacity to serve the residential growth planned in Dover over the lifetime of the plan. Additional demand generated by housing growth, is likely to result in a requirement to build additional, larger sites or invest in the maintenance or repair of existing HWRCs and WTSs.</p>	<p>supporting text and the requirements for HWRCs and potential requirements for WTS have been addressed in the IDP.</p>
<p>General comments / other infrastructure</p>	
<p>Section 9 Transport and Infrastructure (Pages 139 to 153) Page 140 (9.4) Why only young people? It is important for them, but services and facilities (not detailed) are relevant for all age groups.</p>	<p>Comment noted. The paragraph was intended to highlight the infrastructure needs for all residents of the district, and was highlighting the services for young people as a specific area of deficit/requirement. This will be redrafted to ensure this is made clear.</p>
<p>Roads and education are the responsibility of KCC. How do their plans for improvements and new schools fit in with DDC? And Health infrastructure: GP surgeries and hospitals are the responsibility of CCGs, and what are their plans? Do they only react retrospectively? after the local plan decides where houses will be built, or do they plan in advance? Where are any plans? And public transport again, is this retrospective or prospective?</p>	<p>All statutory bodies and Infrastructure providers such as those mentioned are involved with the production of the Local Plan from initial stages and consulted on specific requirements. Their supporting data and plans/strategies are used to inform the baseline data and their position on the LP proposals. Policy SP13 sets out how the infrastructure is then secured through developer obligations.</p>
<p>National Grid have identified one or more National Grid assets within the Plan area. Electricity Transmission Asset Description PC ROUTE: 400Kv Overhead Transmission Line route: PC ROUTE A plan showing details and locations of</p>	<p>Comments noted. There are no proposed allocations within the asset area.</p>

<p>National Grids assets is attached to the representation (DLP1688). Also see representation for further guidance on development close to National Grid assets.</p>	
<p>Page 142 (9.18) States reference to existing Local Plan Policy DM 27. The existing Local Plan (LDF Core Strategy Adopted February 2010) only goes to DM 25, with no DM 27. This needs clarification.</p>	<p>Clarification: DM27 is contained within the Land Allocations Local Plan 2015.</p>
<p>Chapter should mention renewable and low carbon infrastructure.</p> <p>Plan needs to address the commitment to be carbon neutral.</p>	<p>This is dealt with in the Climate Change chapter.</p>
<p>All too often applications for outlining planning permission lack details and have most matters reserved including infrastructure. It is felt that in the Local Plan there should be mention of the basic information that must be included in any Outline Planning application.</p>	<p>There are standard national requirements for documentation required to be submitted to support planning applications, and a local validation checklist. This will be updated following adoption of the Local Plan to ensure all policy requirements are met.</p>
<p>Proposed development sites, including those at Aylesham, close to the CCC/DDC border, will generate the need for supporting community infrastructure and transport measures. If these impacts are not adequately addressed, and at the right time, there is potential for adverse impacts on existing residents, including communities at the eastern periphery of the Canterbury District.</p>	<p>Comment noted.</p>
<p>DLP1809 - Highways England will work with Dover within the Dover Access Project to promote connectivity and address the issues surrounding the A20 in a safe manner meeting design standards within DMRB.</p> <p>Deal Town Centre would benefit from improved connectivity with the seafront. Highways England notes that Deal is connected by Rail and via the Deal Road (A256) which connects at the Duke of York Roundabout. The roundabout is subject to sensitivity tests for any additional development and will need to be included as part of any cumulative impact testing in this area.</p>	<p>Comments are noted. DDC will continue to work in partnership with Highways England throughout the plan making process to identify projects required from the growth identified within the Local plan.</p>

<p>Sandwich Town centre is highly accessible by active mode and public transport and increases with regards to trip generation should continue to be supported by these modes.</p>	
<p>Various general comments relating to infrastructure capacity and meeting growth:</p> <ul style="list-style-type: none"> • Support / Agree that the right infrastructure needs to be provided at the right time and the right place. • The wording covers Infrastructure concisely and adequately on paper. This needs to be brought to reality, preferably in advance of building, so the load of construction vehicles has the benefit too. • Not enough amenities for the number of proposed homes • Schools, medical services, sewerage, roads all need urgent attention and are not mentioned in plans for increased housing development. • There will be increased demands on services such as doctors, schools, refuse collection, and disposal of wastewater (a high priority in the Sholden/Deal/Walmer area). • Aylesham village has had a large amount of growth already which has put strain on services. is significantly lacking in local amenities. There is a clear need for amenities such as a pub-restaurant; dentist; supermarket and community facility such as a village hall. 	<p>Comments Noted.</p> <p>Site specific allocation policies will address local infrastructure requirements evidenced and require services in relation to the site mitigation. These will be reflected in the IDP which will support the Local Plan, and policy SP13.</p> <p>This can also be applied to windfall schemes as they come forward to ensure the right services are being delivered in the right areas.</p>
<p>Infrastructure Delivery Plan</p>	
<p>Understand that the IDP will address infrastructure provision. When will this be published. How can the public be expected to effectively comment on the draft plan when important information that would guide our input is not available at the time of the consultation? Where is the Infrastructure Delivery Plan?</p>	<p>This will be published alongside the Regulation 19 plan.</p>
<p>Highways England notes that an Infrastructure Development Plan will be created that will indicate those areas where funding or mitigation schemes are required. Highways England would be supportive of this approach, as it enables an opportunity to explore each site in detail and allow for key mitigation measures and design schemes to be considered. There is a small risk that some</p>	<p>Comments noted.</p>

development may not come forward due to the prescriptive nature of the IDP or that a site may not be accounted for if it does not appear in the IDP.	
Need to ensure that funding for public transport and active travel in the strategic and larger sites is costed and funded with delivery dates: See https://www.transportfornewhomes.org.uk/wp-content/uploads/2020/06/garden-villagevisions.pdf , June 2020	All infrastructure requirements are considered, working with the providers. This requirements will be reflected within the IDP and specific site policies if required. These will be costed and funding and delivery detailed where possible.
Paragraph 9.11: Case by case consideration of infrastructure needs to be continued, and refined via use of the Infrastructure Delivery Plan. The list of infrastructure needs start with transport/highways and is then reflected in the policy order - this is not consistent with the bold/radical approach that the Council says its taking with respect to climate change.	Climate change policies will also be implemented and considered on each application.
DDC need an infrastructure delivery plan that addresses strategic sites and the cumulative effect of housing developments.	Comments noted. The IDP will consider the cumulative requirements for the Local plan over the whole plan period.
It is noted from the Infrastructure Topic Paper (3.1) that there have been initial discussions with a range of key infrastructure and service providers and that these have not identified locationally specific issues that might prevent specific options being considered. This may change when the employment strategy is finalised.	Any updates to evidence in relation to current site proposals, or whole plan viability and infrastructure requirements will be assessed prior to the publication of Reg 19 Local Plan.

S106 / CIL	
<p>Disagree that s106 agreements provide greater certainty</p> <p>Paragraph 9.30 should be rewritten to signal the Councils intention to implement a CIL before the Plan has run a quarter of its projected course The Council should adopt CIL.</p> <p>A further sentence should be added to SP13 stating that: The Council intends to introduce a Community Infrastructure Levy as soon as possible but before 2025 so that the council, developers and residents can more clearly understand the financial requirements of any agreed planning permission.</p>	<p>Comments are noted. It is not the Council's intention to introduce the Community Infrastructure Levy as Section 106 legal agreements are considered to provide a greater level of certainty for delivery of specific infrastructure. Further, changes to the CIL Regulations in 2019 now allow for more than five contributions to be pooled together, removing what was a significant impediment to</p>

<p>It is contradictory that the council wont bring in CIL, but yet will pool S106 contributions</p> <p>Worth Parish Council believes that the Draft Local Plan needs a dual control system to collect infrastructure revenue both S,106 and the CIL.</p>	<p>securing Section 106 funding from smaller sites. With two funding mechanisms – S106 and CIL – in place, there is potential that developers will be requested to pay contributions via both – known as ‘double dipping’.</p>
<p>In Sandwich there are a number of small sites that wont individually generate much S106 and so an option to pool these contributions may be desirable.</p>	<p>With regards to community consultation, the IDP will set out a list of projects which members of the community (through PCs, or local sports groups) will be/have been involved in shaping, along with the relevant statutory bodies for all infrastructure provision.</p>
<p>Ensure the community are consulted regarding the expenditure of any financial contributions resulting from a development.</p>	
<p>Support the implementation of CIL over the use of S106 Agreements</p> <p>Highways England notes that Strategic Policy 13 states that CIL collections are not intended to be utilised to collect funding as S106 can provide greater level of certainty for delivery specific infrastructure. As such, Highways England is satisfied with this draft policy</p>	<p>Support Noted</p>
<p>S106 funds seem to be directed to recipients not in the immediate area or of benefit to the immediate area to compensate for the development. This needs to be covered in the Local Plan whereby Section 106 payments are defined more clearly as to what they can be used for in the District</p>	<p>The IDP will set out a clear plan for infrastructure for the district as a whole and specific areas based on evidence in the supporting documentation and liaison with relevant infrastructure providers / local communities. If off-site contributions are received, the S106 will set out which project they are to be allocated to.</p>
<p>Viability, Delivery and detail of SP13</p>	
<p>Amend the policy to negate the use of residual land value calculations & feasibility studies</p> <p>Disagree with the statement that infrastructure will be provided alongside proposed developments or</p>	<p>The NPPF and PPG require the Local Plan include a viability assessment which is included as a supporting document. However, the</p>

<p>that appropriate phasing for the provision of infrastructure will be determined on a case-by-case basis. The infrastructure needs to be built first or watertight legal agreements agreed to ensure the infrastructure is in place prior to commencement of developments.</p>	<p>Local plan provides a long-term framework for development and it is essential that this sufficiently flexible for sites coming forward to account for changing circumstances, such as rising costs and potential changes in development values over the next 20 year period. The PPG sets out (Reference ID: 10-006-20190509) that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. It identifies a list of circumstances in which it might be appropriate to revisit viability considerations at the planning application stage, which includes promoting development on unallocated sites which have not been assessed as part of the Plan. It also makes clear that any viability appraisal submitted must take into account and use the same assumptions as the Local Plan Viability Assessment, or make clear where the viability evidence is out of date. Therefore, the policy reference to allowing the case by case assessment of viability is required to remain in order for the policy to be sound. With regards to requiring infrastructure to be in place prior to development commencing, this is not usually possible. There are specific tests required, and</p>
<p>It is not the Councils role to have regard to any planning applications financial viability. It is the responsibility of the applicant to have in place sufficient funding or access to sufficient funding in order to realise the project.</p>	
<p>Policy refers to when site specific requirements are known then they will sort out infrastructure, where is the planning, in the hands of the developer?</p>	
<p>If the infrastructure is needed it is needed regardless of viability considerations and specific circumstances.</p>	
<p>The Council has enabled developers and itself to not use those mechanisms. ' In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances.' - This gives the developer the upper hand in negotiating conditions and financial contributions.</p>	
<p>The last sentence of Strategic Policy 13 should read: In determining the nature and scale of any provision, the Council will ensure that any Section 106 financial contributions and any conditions are only varied in extreme circumstances.</p>	
<p>The Local Plan must have a strategic policy that states that any permission for future major developments will not be granted unless infrastructure and services are built or legally provided for, prior to commencement of development.</p> <p>Paragraph 9.28: The paragraph states that once site-specific requirements are known they will be identified through the site allocation policies. It is not clear when this will occur. Will it allow a revised viability report? If it has an impact on site viability and the viability of the plan will the site be omitted or included with reduced infrastructure requirements?</p>	

	<p>one of those is that the contribution must mitigate the effects of the individual development. These are often requested on commencement, but not always. The tests are set out in CIL regulations and legislation.</p>
<p>KCC have stated this policy (sp13) is relatively vague and as such may not be sufficiently effective in supporting the delivery of infrastructure. The Local Plan should seek to be more succinct in its approach to transport infrastructure, by providing an adequate level of traffic/trip impact assessment and a subsequent mitigation strategy to inform site by site policy. Whilst an element of overarching policy is required to encompass any windfall or opportunity sites that might be identified throughout the lifetime of the Local Plan, the wording of the policy does not provide sufficient indication of when infrastructure will be sought.</p> <p>Reference to site-by-site viability is noted, however it is essential that sufficient detail is included within the whole plan viability assessment, to ensure that the final site selection provides a realistic picture of the prospects of the County Council receiving infrastructure contributions in the future. This also includes a realistic indication as to the level of affordable housing likely to be secured to assist in speeding up the development planning process at planning application stage.</p>	<p>PROPOSED CHANGE: Policy SP13 will be updated to add clarity and list specific projects and will be supported by the IDP and site specific requirements set out in allocations. This will include a level of appropriate detail such as expected phasing. KCC will be consulted throughout the process.</p> <p>There is a separate Transport Statement / Assessment policy which will address the concerns around traffic and trip assessments.</p> <p>The Affordable housing policy will set out clear expectations for AH requirements.</p>
<p>CCC note that draft Strategic Policy 13 seeks to secure necessary infrastructure improvements to mitigate the impacts of planned growth at the right time. As set out in our emerging Statement of Common Ground, the delivery of strategic improvements to the A2 corridor, including those within Dover District, are shared priorities.</p>	<p>Comment noted. Statement of Common Ground will be updated.</p>
<p>Various general comments were received about developer obligations process and delivery of infrastructure at the right time:</p> <p>It is unfortunate that the legal framework governing the planning process does not give Planning Authorities much control over the delivery of the plan. Delivery therefore becomes dependent on the discretion of developers. This lack of control has</p>	<p>Comments noted.</p> <p>The IDP will set out clear requirements in relation to the expected delivery and phasing of infrastructure requirements. This will be secured in S106 agreements with relevant trigger points</p>

<p>resulted in large sites being developed piecemeal, without critical infrastructure already in place.</p> <p>Most large scale developments are required to make financial contributions towards public transport provision. This is usually tied to the occupation of an agreed number of homes, but can result in access to public transport not being available to the early occupations for several years. It also provides an incentive for developers to slow down the build rate in order to delay payments, or in some cases, to cease building altogether.</p> <p>Recommend that future financial contributions should be tied to a fixed time period after the first occupation.</p> <p>The Council needs to be firmer with developers to ensure that the right infrastructure is delivered in the right place, at the right time. The provision of buildings is one aspect. Provision of sufficient personnel is the other.</p> <p>Paragraph 9.26: This would appear to be a chicken and egg situation where the development strategy informs infrastructure needs, which may in turn impacts on delivery of the strategy.</p>	<p>associated with commencement or occupations.</p> <p>The PPG and legislation set out clear requirements for the developer obligations process which include where required by evidence, forward funding of some services such as bus operations. However, obligations have to meet strict tests set out in that development is mitigating against its own impact, rather than improving an existing deficit.</p>
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Summary of Proposed changes

- Further details will be added to supporting text to list all the types of infrastructure covered by the policy, including community and waste
- Addition of paragraph to policy and supporting text around deferred payment mechanism and how this will be applied in exceptional circumstances
- Clarification will be added relating to IDP and detailed projects
- Clarity will be added relating to infrastructure needs to meet 'all' residents
- Detail will be added to supporting text around the exact requirements for viability assessments

Strategic Policy 14: Strategic Highway Infrastructure (Reg 19 Policy SP12 – Strategic Transport Infrastructure)

In total 16 representations were made on this policy by 15 consultees. Representations were received from:

Full Name	Organisation	Comment ID
Mr Phillip Coleman		DLP58

Deal and Walmer Chamber of Trade		DLP87
Mr Ross Miller	Masterton Robin Designs Ltd	DLP512
Bethan Garrity		DLP571
Keith Holness	Nonington Parish Council	DLP2188
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1896
Cllr Peter Walker	DDC WARD - Aylesham, Eythorne and Shepherdsweil	DLP2042
Ms C Smith		DLP1188
Barbara Cooper	Kent County Council	DLP1748
Derek Leach	The Dover Society	DLP3035
Ms Sarah Gleave	Dover and Deal Green Party	DLP2833
Mike Eddy	Walmer Parish Council	DLP2021
Kevin Bown	Highways England	DLP1755, DLP1779
Kelly Lawrence	Deal Town Council	DLP2134
Ms Marnie Caton	Sandwich Environmental Conservation Group	DLP3334

2 respondents stated that they agreed with the policy and 5 respondents stated that they objected to the policy and 9 neither agreed nor objected.

Summary of Representations – Main Issues

Summary of representations	Councils response / Proposed change
The majority of the comments support the dualling of the A2 this should be encouraged.	Support noted
Support the A2 upgrade but by means of delivering a Whitfield East bypass which in itself could have access points to the high residential areas of the Whitfield Urban Development Plan thereby easing the traffic flows on the Whitfield Roundabout. The bypass would join up with the A256, already a dual carriage way, re-joining the existing A2 to be upgraded to dual carriage way to the Duke of York Roundabout that would also be upgraded.	Comments noted. Full traffic modelling will be undertaken.

<p>Consensus that further development shouldn't go ahead in the District without the widening of the A2.</p>	<p>Noted</p>
<p>We are concerned about the inclusion of upgrading the A2. Important considerations will be the effect of Brexit on traffic movements between Europe and the UK and the ports of entry, and air quality. Rather than the anticipated construction of a new Lower Thames Crossing. The DCO has still to be resubmitted, accepted and examined. See The CPRE 2017 report The end of the road? Challenging the road-building consensus (https://www.cpre.org.uk/resources/the-end-of-the-road-challenging-the-road-building-consensus/)</p>	<p>Comments noted.</p>
<p>Highways England notes that at present, the A2 Brenley Corner junction upgrade near Faversham is the only project identified within RIS3, while the Dover Access Project is being taken forward as a proposed development under the Ports Infrastructure Fund. Restricting identification of transport schemes strictly to the RIS programme runs the risk of missing more localised needs. Highways England considers that while supporting the RIS3 work is essential, DDLP may wish to also refer to those allocations where a contribution to funding is likely to be expected whether through financial contribution or developer undertakings. In this manner, the larger works can be referred to and supported by DfT where the smaller works are identified effectively by Dover Council.</p>	<p>Comments noted. The Strategic Transport policy will be updated to reflect the A2 improvements.</p> <p>Site specific requirements will be included within relevant policies and the IDP.</p>
<p>Any changes to the Duke of Yorks roundabout need to ensure that the A258 arms are not further inconvenienced for traffic heading to and from Deal.</p>	<p>Comments noted. This will be addressed in traffic modelling.</p>
<p>The A2 corridor is a key consideration within the proposed growth aspirations, it is important that this is reflected in policy, however this could equally form part of a future Transport Strategy for the district.</p>	<p>Comments noted. A2 corridor will be mentioned specifically in policy.</p>
<p>Given the wide-ranging traffic challenges within the District, there would be merit in encompassing highway and transportation matters into a single supporting document.</p>	<p>Comments noted.</p>
<p>As the Dover Access Project is potentially several years away from being completed/clarified in full, it is accepted that mitigation proposals in relation to the A2 corridor will need to be suitably fluid in nature.</p>	<p>Comments noted.</p>

<p>Initial modelling forecasts suggest that infrastructure improvements may be required on the A256 corridor (subject to more detailed highway appraisal). Given that this road corridor forms part of the Major Road Network, it would be prudent to consider policy to safeguard future upgrade opportunities on this road corridor.</p>	<p>Comments noted. The corridor is not identified in the Local Plan transport modelling.</p>
<p>KCC acknowledges that the Local Plan references to the strategic transport projects of the Lower Thames Crossing, bifurcation of port traffic between the A2/M2 and A20/M20 corridors and Highways England's A2 Dover Access project, and the County Council looks forward to working together with the District Council on these projects.</p>	<p>Support noted</p>
<p>KCC notes the support for the A2 Dover Access project, which is being led by Highways England and the statement that development proposals which undermine the delivery of the project will not be supported.</p>	<p>Support noted</p>
<p>KCC is working with Highways England to develop the business case for the A2 Dover Access scheme, which is a Road Investment Strategy (RIS) 3 (the 2025-30 five-year funding period) pipeline scheme. However, a decision on whether the scheme will be funded for delivery in RIS 3 will not be made until towards the end of the current RIS 2 period in 2024/25 by the Secretary of State for Transport.</p>	<p>Reference to the A2 Dover Access Project (as identified in RIS 3) and KCC support for the project will be identified within the policy.</p>
<p>The council must complete dualling of the A2 and Jubilee Way from Eastern Docks to Lydden Hill by December 2022, at the latest, the imposition of the Dover IBF makes this imperative.</p>	<p>Comment noted. Phasing of highway improvements will be detailed within the IDP.</p>
<p>SP14 would benefit from the addition of the following: Proposals which assist in the provision of alternative transport modes across a dualled A2 will be encouraged. The Council will work with Highways England and Kent County Council to improve accessibility elsewhere in Kent between the two principal access routes to the Port of Dover, the M20 and the A2. The Council will work with partners to improve access to the local and High Speed rail network.</p>	<p>Sustainable travel improvements will also be detailed within the strategic transport policy.</p>
<p>Strategic Policy 14 is very specific in that it considers only the improvement of the A2 for motor vehicles.</p>	<p>Comment Noted. The policy will be revised in order to reflect all strategic transport infrastructure</p>
<p>SP14, makes no reference to the High Speed rail or to any other rail improvements. Rail is omitted from DM 4 (Sustainable Travel). SP14 should be re-titled Strategic Transport Infrastructure.</p>	

<p>Strategic Policy 14 which is very specific in that it considers only the improvement of the A2.</p>	
<p>SP14 contains a sentence which is unclear 'Proportionate developer contributions will be sought from new development for which this mitigation may be necessary'. It is unclear what 'this mitigation' refers to in the immediately preceding sentence.</p>	<p>Comment noted. Sentence will be clarified.</p>
<p>Highways England will be concerned with plans and/or proposals that have the potential to impact the safe and efficient operation of the SRN, in this case, particularly the M20/A20 and A2. In particular, the area around Whitfield Interchange, Duke of York Roundabout and Whitfield Roundabout are sensitive to increases in traffic.</p>	<p>Comments noted. DDC will continue to work with HE and other statutory consultees on the improvements required to the Whitfield and Duke of York roundabouts. Details of Whitfield scheme are now included within SP13.</p>
<p>Several key junctions within or beyond the Dover District area currently experience congestion during both AM/PM peak periods. Therefore, future development proposals that would impact the SRN network would need to be robustly assessed and mitigated via the appropriate channels. As you will be aware, the roads Investment strategy for the 2020 to 2025 period committed to carrying out an Access to Dover study. Therefore, currently there is no guarantee of what, if anything, may come of the study. Consequently, the Local Plan will need to assess its impacts and mitigate them accordingly. In the event the a RIS scheme comes forwards decisions can be taken with regards any Local Plan process/ framework/ mitigation in terms of whether they are implemented, superseded or amalgamate into a larger scheme.</p>	<p>Updated traffic modelling, in consultation with Highways England and KCC Highways and Transportation will take place prior to Regulation 19 stage.</p> <p>Other Comments noted.</p>
<p>Highways England is currently not undertaking any significant improvements on the SRN within the vicinity of Dover. However, there is a scheme waiting to be implemented at the Whitfield Roundabout arising from Condition 10 attached to the Whitfield Urban Extension (DOV/10/01010). It has a trigger of 800 dwellings to be implemented, but this is unlikely to be reached for some time. Given the nature of development surrounding the Whitfield Urban Extension, Highways England has taken the approach of requiring all planning applications coming forward in this area, or which will have impact upon the Duke of York and Whitfield Roundabout, to consider a cumulative impact assessment within their Transport Assessment. As you will be aware, we are working</p>	

<p>with the Council and others with regards assessing the current capacities of Whitfield and Duke of York and to see what, if any, short term improvements, separately or in combination with any existing proposed improvements may be deliverable.</p>	
<p>Highways England is also aware of the high level of development coming forward within Dover in various locations that are likely to have an impact upon the A20, A2 and the M20, slightly further afield. Current traffic levels during the AM (08:00-09:00) and PM (17:00-18:00) Peak periods on the A2 indicate that there are several junctions which have congestion issues. These include the Whitfield Roundabout, as discussed above, Duke of York Roundabout, A20 Jubilee Way Roundabout, M20 J13 and various linkages of the A256. While Highways England recognises that the A256 is not part of the SRN, it does play an important role in Operation Stack, for the Inland Border Facility at Manston Airport. Therefore, the interaction between the A256 and the SRN is a key consideration.</p>	
<p>Highways England strongly advise that the emphasis within the Draft Dover District Local Plan should be placed upon reducing the need to travel and, where travel is necessary, to use more sustainable modes rather than relying on improvements being in place. Any necessary improvements required because of proposed development would need to be identified, designed, managed, and fully funded via the individual proposals or via a Local Plan mechanism.</p>	<p>Comments noted and addressed through policies for sustainable travel and infrastructure and site-specific requirements will be detailed within site allocation policies and secured by S106 Agreement.</p>
<p>Strategic Policy 14 strengthens the relationship between Dover Council and Highways England to work together to facilitate major, long-term improvements to the A2 through the Dover Access project within the Road Investment Strategy.</p>	<p>Support noted</p>
<p>Developers will be required to consult with Highways England and developer contributions will be required in proportion with the proposed mitigation.</p>	<p>Noted</p>
<p>Highways England notes that the Dover Access project is not listed as a committed RIS 3 Scheme; the project is listed as part of the proposed pipeline of future schemes for development between (2025/6 to 2029/30). The RIS 3 Delivery Plan identifies funding through the Port Infrastructure Fund for the A2 Dover Access.</p>	<p>Proposed change – Details of the A2 junction improvements and the A2 Dover Access project will be clarified within the revised policy.</p>

<p>The wider picture of Kent strategic transport considers the implementation of the Lower Thames Crossing, as a second strategic route, available between Dover and the Midlands/North. Long term aspirations to upgrade the A2 would support this increase in traffic flow. Additionally, improvements to the High-Speed Rail service from Dover to St Pancras to increase capacity would see an additional shift away from private vehicle to public transport.</p>	<p>Noted</p>
<p>Highways England recognises the need for improvements on the A2 in order to facilitate future development and will work closely with key stakeholders, such as Dover District Council, in order to progress matters.</p>	<p>Support noted.</p>
<p>Lorry Parking</p>	
<p>Paragraph 107 of the National Planning Policy Framework (NPPF) 2019: Planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. KCC surveys of overnight lorry parking have determined that the Dover area and A2/M2 corridor has significant numbers of HGVs parked inappropriately overnight, and that there are indeed local shortages in parking provision to address, which the Local Plan should recognise in order to follow the guidance in Paragraph 107 of the NPPF.</p> <p>KCC is currently aware of private sector interest in a number of potential overnight lorry parking sites in this project corridor, which should be complementary to the strategic transport objectives of the A2 Dover Access project.</p>	<p>PROPOSED CHANGE A New policy for Lorry Parking will be included in the Local Plan</p>
<p>Inland Border Facility</p>	
<p>KCC: In respect of the White Cliffs Inland Border Facility being proposed by the Department for Transport to help facilitate the flow of trade to assist with freight movements across the Short Straits, the County Council submitted its response to the government consultation on 10 February 2021. In its response, the County Council highlighted the need for alignment of the scheme with the committed Dover Fastrack Scheme to ensure they are able to operate successfully together. The County Council also strongly advocated that the improvements to the A2 Dover</p>	<p>Comments noted. The IBF is a DfT application which, should it be progressed, will be assessed under the Town and Country planning Act by KCC.</p>

access, identified as a future pipeline scheme in the Highways England Road Investment Strategy 2, are accelerated to earlier in the programme to support the operation of the White Cliffs Inland Border Facility.	
The separation of local traffic from through freight traffic by means of flyovers and underpasses at the Duke of York, and Whitfield roundabouts must take place by December 31 2022, 2 years after the Dover IBF was announced.	
The IBF goes against policies SP 14 and DM 29.	

Specific highways capacity / transport infrastructure projects raised throughout chapter:	Councils response / Proposed change
<ul style="list-style-type: none"> • A256 corridor - acts as a key transport corridor • Deal has inadequate road infrastructure with 2 narrow arterial roads. • More needs to be done to improve highways safety. improvements (especially on the A2, A20 and A256) to separate local traffic from through freight traffic • highways safety matters in Sandwich • A258 - north Deal connecting road • junction of London Road with Mongeham Road and Manor Road are already or will operating above capacity • Road network in Langdon isn't sufficient to cope with housing growth. • Planning conditions and s106 funding must improve key roads in Aylesham before any new developments occur • More dwellings mean increased traffic within the Sholden, Deal and Walmer area • Open Manston Airport as a cargo and freight hub • highways linkages between the two principal roads entering Dover (the M20 and the A2) elsewhere in Kent, so that, if there is a blockage 	<p>The Council notes all the proposed transport infrastructure projects and comments on highways and junctions across the district.</p> <p>The Local Plan as a whole will include a strategic analysis of highway capacity and impacts. Projects identified through the Transport Modelling will be covered by the Strategic Transport policy, and where relevant and identified by KCC Highways and Transportation, specific local requirements for highway improvements or mitigation will be included within site specific policies.</p> <p>For other highway improvements, such as those identified within the various representations, these have not been identified by the strategic modelling, or KCC Highways and Transportation as issues which the Local Plan is required to address at this stage. It is important to note that the requirement for S106/S278 contributions towards Highways improvements can only be sought where they are directly related to the development in question and are not sought to improve existing deficits in the network.</p>

<p>on one route traffic can be switched to the other</p> <ul style="list-style-type: none"> • Dover districts rural highways network is under stress has not translated into an overarching evidence-based approach to the cumulative impact of developments on the rural road network. • Spinney Lane and B2046 (Adisham Road). • Highways upgrades (eg roundabouts and improved lighting) should be included on Cooting Rd/Spinney Lane and Cooting Rd/B2046 as well as further away at the B2046 junction in Wingham • Widen the Deal to Dover Rd for a safer and free movement of traffic. • The B2046 from wingham to A2 needs improvements to a number of junctions. In inclement weather its unusable. 	<p>However, when applications are received in those areas for new development, particularly where they are large scale, a Transport Assessment, Statement or Travel Plan will be required and KCC will be consulted to identify where mitigation may be required.</p> <p>Cumulative impacts on the highway network and sustainable travel options will also be considered as part of the Transport Assessment / Travel Plans required on all major applications across the district.</p> <p>The A258 proposal is not currently required to mitigate the impact of development set out in this Plan, and significant environmental constraints have been identified. However, this proposal may be considered as a future possibility</p>
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Summary of Proposed Changes

- Policy will be retitled – ‘**Strategic Transport Infrastructure**’ and will address highways, rail and bus infrastructure
- Highway section will address the A2 mitigation specifically
- Highway section will address LP transport modelling and requirements for other strategic highway improvements specifically
- Chapter and Policy will include reference to rail infrastructure and Dover Priory Station car parking scheme
- Chapter will include reference to bus infrastructure and specifically dover fastrack service
- Overnight Lorry Parking – new policy will be drafted in this chapter to address future windfall applications for lorry parking

DM Policy 29: The Highway Network and Highway Safety (Reg 19 Policy TI2 - Transport statements, assessments and travel plans)

In total 17 representations were made on this policy by 17 consultees.

Representations were received from:

Full Name	Organisation	Comment ID
Peter Jull		DLP35

Mr Martin Brandon		DLP358
Ms Christine Haggart	Ash Parish Council	DLP1157
Keith Holness	Nonington Parish Council	DLP2189
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1897
Cllr Edward Biggs	DDC WARD - Town and Castle	DLP2000
Cllr Peter Walker	DDC WARD - Aylesham, Eythorne and Shepherdswell	DLP2050
Mrs Jean Ross		DLP1396
Seb Willett	Langdon Parish Council	DLP1254
Dover Town Council		DLP1184
Ms Sarah Gleave	Dover and Deal Green Party	DLP2834
Kevin Bown	Highways England	DLP1780
Barbara Cooper	Kent County Council	DLP1749
Kelly Lawrence	Deal Town Council	DLP2135
Duanne Poppe	Ringwold with Kingsdown Parish Council	DLP1837
Mike Eddy	Walmer Parish Council	DLP2022
John Symonds		DLP2641

3 respondents stated that they agreed with the policy, 6 respondents stated that they objected to the policy and 8 respondents neither agreed or objected.

Summary of Representations – Main Issues

Summary of representations	Councils response / proposed change
<p>Various comments received relating to the traffic modelling and consultation available on this, and any future transport assessment / travel plans</p> <ul style="list-style-type: none"> • The Council needs to explain more how the cumulative effect of all the proposed employment and homes developments on the traffic in the district has been assessed • Concern that DDC have done no proper traffic planning for the impact of the traffic new houses. • Plan will result in an increase in commuting that will put pressure on the road network. No evidence that this has 	<p>The Local Plan as a whole will include a strategic analysis of highway capacity and impacts. This will be covered by a Strategic Transport policy.</p> <p>Cumulative impacts and sustainable travel options will also be considered as part of the TA / TP process set out in this policy.</p> <p>As part of the planning application process, interested parties will be able to view and</p>

<p>been looked at as part of the preparation of the Plan.</p> <ul style="list-style-type: none"> • The planning allocations will have an adverse impact on the highway network particularly in rural locations. • Urban and rural assessments should be different. • Concern that existing transport infrastructure wont be able to cope with the level of planned housing growth from several representations. Particularly the rural areas. • Comment that Residents and stakeholders should have maximum opportunity to comment on the mitigation measures proposed and the developments to which highway constraints have been identified before they are formally included in the Regulation 19 consultation. • The assessment on 'case by case' basis is objected to in several representations as not being adequate as they need to be more strategic and because of the climate change focus of the plan – this wont work. • Given that the plan has still to finalise both the number of jobs over the plan period and their location it will be important to revise the transport assessment. 	<p>comment upon the Transport assessments / Travel Plans submitted, as well as view the comments from KCC Highways.</p> <p>Further consultation will take place on Local Plan modelling with the Statutory consultees (KCC highways and HE) during the plan preparation stages to ensure all modelling is accurate.</p> <p>Consultation on the final policies and supporting documentation with the public will take place at the formal stage of Regulation 19, as required by legislation.</p>
<p>Concern from several reps that the use of terms such as 'significant', 'severe' and what constitutes traffic delays in the different areas have very different meanings and need clarification.</p>	<p>This terminology is used as standard when assessing highway impacts by the statutory body who would be consulted during the application process. It is the duty and role of KCC highways and transportation as the Highway Authority to undertake these assessments. DDC will then determine the application on that basis.</p>
<p>The current policy of subjective judgements determining approval or otherwise of developments is a primary cause of discontent between local residents and planners where they have a lower tolerance of traffic congestion and volumes than the highway authority does. Even where junctions are deemed by technical standards to be operating above capacity Kent Highways still don't object to developments because the additional traffic doesn't make unacceptable congestion sufficiently worse.</p>	
<p>Detailed Representation from Nonington PC (2189) – includes comments relating to:</p> <ul style="list-style-type: none"> • Traffic Impacts relating to site allocation proposals in Aylesham and Elvington and that these allocations would not be 	<p>See response above in relation to the definition of the terminology in relation to assessing impacts on the Highway network.</p>

<p>compliant with DM29 in relation to impacts on the local roads</p> <ul style="list-style-type: none"> • Traffic modelling has not been undertaken correctly and conflicts with the SA supporting the Local Plan • References such as 'severe' etc not defined • Terminology not clear in Reg 18 plan with regards to 'preferred option' 	<p>The Regulation 18 Plan contained a number of policy options, which were clarified. This is to enable views to be sought on which may be the most suitable final policy approach for the Regulation 19 plan. These policy options will also be assessed as part of the supporting Sustainability Appraisal process.</p>
<p>Strategic Policies 13 and 14 and DM Policy 29 The Highway Network and Highway Safety are welcomed.</p>	<p>Noted</p>
<p>The alternative policy identified should be implemented as firm thresholds should be established for when Transport Assessments and Travel Plans are required as this is a major issue when assessing planning applications.</p>	<p>Comments noted.</p>
<p>New and intensified existing access points with 'sufficient mitigation' should be carefully considered and further clarified.</p>	<p>Comment noted</p>
<p>Although primarily within the remit of Kent County Council Highways, we would urge that an approach similar to surface water drainage could be taken 'new development should not negatively impact existing baseline traffic FLOW (which can be qualified as the relationship between capacity and speed, ie. High flow does not necessarily equal high speed)'. </p>	<p>Further Traffic modelling will be undertaken as part of the local plan reg 19.</p>
<p>It needs to be clear that all types of development and change of use that potentially create additional HGV travel into Dover Town have conditions attached which prohibit this. Creative and aggressive traffic management is needed to prevent HGVs cutting through the town centre in Dover and the use of overly large vehicles for delivery to small premises.</p>	<p>Comment noted. Traffic management issues will be addressed within transport assessments</p>
<p>Applicants must demonstrate that their plan includes the installation and cost of installation of the protected cycle-paths and kerbed pavements described above.</p>	<p>Comment noted – details such as this will be addressed within transport assessments and travel plans where appropriate.</p>
<p>Highways England respects the DDLP intent to assess each application on its own merit and determine a case-by-case assessment as to whether further transport information in regard to Transport Assessment or Travel Plan is required. Given the sensitivities on the SRN network at</p>	<p>Support noted. The council are working with HE on solutions through traffic modelling. This will include cumulative development impacts.</p>

<p>various junctions, Highways England would be concerned with regards to cumulative development impacts upon the wider area and may require further evidence to support each application. Proposals that support sustainable and active travel measures and propose to mitigate their own transport implications are welcomed.</p>	
<p>The general aims and objectives of this are supported, however at this stage it is possible that some of the proposed housing allocation sites may not be in accordance with this policy. Some larger allocation sites are in relatively remote locations of the District and can only be accessed via existing highway routes that are subject to constrained geometry.</p>	<p>Comments noted. All site allocation policies will include any requirements highlighted by KCC.</p>
<p>KCC recommends the removal of the last sentence of the second paragraph 'unless the proposals can incorporate measures that provide sufficient mitigation' to avoid any potential contradiction with the first paragraph.</p>	<p>Noted – sentence will be removed.</p>
<p>Lack of reference to Kent Highways policy on road adoption. Suggested text for inclusion: 'Where roads serve more than 5 houses then those streets will be required to be constructed to adoptable standards. If such roads are not put forward for adoption in line with Kent Highways policy a developer will need to give robust reasons why not.</p>	<p>Comment noted. However, this issue will be dealt with at application stage and cannot be specified within policy.</p>
<p>Highways England typically considers that Transport Assessments are required in line with WebTAG guidance, for approximately 80 houses or above. However, as the DDLG correctly points out there are situational and locational aspects of each site which may dictate the need for more detailed evidence to support an application than a housing threshold. As such, Highways England will defer to Dover Council in their preferred approach towards the requirement of a Transport Assessment and Travel Plan, under the provision that Highways England may require detailed assessment of the SRN at sensitive junctions or where there is considered to be an impact due to cumulative development.</p>	<p>Comments noted.</p>
<p>Highways England stands ready to work with Dover Council to ensure that mitigation measures and highways improvements, where required because of development, are provided, and can</p>	<p>Comment noted.</p>

<p>be delivered for the SRN via appropriate local plan mechanisms.</p>	
<p>Paragraph 9.37: The paragraph states that the Transport Model identifies that parts of road network will need to be upgraded and that further work is required to identify the specific mitigation required and will be developed through the next stage of the Local Plan process. Will this result in wider roads, new roundabouts, lighting (with its impact on biodiversity and dark skies) that have an adverse impact on the countryside or village setting? Underlying principle is that the strategy wont be capable of delivery without road improvements being at the heart of the matter.</p>	<p>There are some major sites which are constrained and undeliverable without highway Improvements. Where these are identified, the council will include any recommendations from the transport modelling. These will be included within the site-specific policies and the IDP.</p>
<p>Paragraph 9.14 - It is agreed that a level of flexibility needs to be applied to the requirement of a Transport Assessment and Travel Plan to reflect the diverse nature of conditions within the Districts highway network. However, a lower threshold could potentially be a reasonable consideration to assist swift and efficient progression of smaller sites that are unlikely to have a significant impact on the highway network. It is possible that this could be addressed within site-based policy where sufficient information is provided ahead of the Regulation 19 process.</p>	<p>Comment noted.</p>
<p>An alternative policy should be adopted that development that would add traffic to a junction operating at or above technical capacity or take traffic above that capacity will not be permitted without physical mitigation measures that would increase capacity or a proportionate financial contribution that together with other developer contributions or other funding would provide that physical mitigation.</p>	<p>Comment noted. Sites which impact on capacity of highways will be required to provide and/or fund mitigation.</p>
<p>Developments in any of the strategic or non-strategic housing allocations will give rise to 'significant' traffic movements where those developments are larger than 15 units as the traffic generated will be cumulative to the existing traffic within the existing built area.</p>	<p>Noted</p>
<p>It is proposed that the following wording replaces the final sentence in DM Policy 29, in order to clarify levels of significance or severity of increased traffic: 'a Travel Plan or Transport Assessment will be required for all residential</p>	<p>The existing approach is a flexible one, without the set unit number threshold.</p>

developments of more than 15 units, the requirements of which will be secured by planning conditions, Section 106 agreement or through the Community Infrastructure Levy as is appropriate. – Double check	
More traffic police to stop lorries parking on the roadside.	Traffic Enforcement is not a local plan issue, but Lorry Parking policy is proposed to be included in Regulation 19 Plan.

Summary of Proposed Changes

- Policy title will be amended to Transport Statements, Statements and Travel Plans to ensure clarity of the purpose of the policy in that it does not deal with specific highway issues in the Local Plan but requires this at Planning application stage
- Detail will be added to supporting text to explain requirements for Transport Statements, Assessments and Travel Plans and which may be required by certain types of application

DM Policy 30: Parking Provision on new Development (Reg 19 Policy T13)

In total 14 representations were made on this policy by 13 consultees.

Representations were received from:

Consultee	Organisation	Comment ID
Mr Jamie Pout		DLP530
Ms Christine Haggart	Clerk Ash Parish Council	DLP1204
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1898
Mr Alan David Steggall		DLP1218
Seb Willett	Langdon Parish Council	DLP1256
Linda Mason	Kent Police	DLP1534
Jo Edwards	Sport England	DLP1681
Cllr Edward Biggs	DDC WARD - Town and Castle	DLP2001
Deloitte	Church Commissioners	DLP1698, DLP3593
Derek Leach	The Dover Society	DLP3036
Ms Sarah Gleave	Dover and Deal Green Party	DLP2835
Barbara Cooper	Kent County Council	DLP1751
Kelly Lawrence	Deal Town Council	DLP2145

2 respondents stated that they agreed with the policy, 3 respondents stated that they objected to the policy and 9 didn't state whether they agreed or objected.

Summary of Representations – Main Issues

Summary of representations	Councils response / proposed change
<p>Paragraph 9.17- Alignment with KCC Parking Standards (IGN 3) is encouraging, however the Kent Design Guide is due to be reviewed shortly and may be subject to continued review throughout the lifetime of the Plan. Therefore, policy should refer to current guidance and include the relevant clause 'or any subsequent guidance' as has been applied to other recently adopted Local Plans in the East Kent area.</p>	<p>Comments noted. Change has been proposed to the policy and supporting text to add 'or subsequent guidance'.</p>
<p>Need to retain both Albany Place and Stembrook car parks.</p>	<p>Comments noted. This policy is not related to public parking. Issues relating to the allocation of those sites will be addressed within the site policies.</p>
<p>Do not agree with the third paragraph that supports no parking provision in favour of "easy walking distance of a range of services and facilities". To allow developments with no parking provision may be environmentally attractive, it is simply not realistic in terms of people's behaviour and lifestyle.</p>	<p>Comment noted. Issues are dealt with in sustainable travel policy and climate change chapter.</p>
<p>Interim Guidance note 3 must become planning law - particularly in rural areas.</p>	<p>This guidance will be used to assess schemes coming forward as part of this policy. However, as with all planning considerations, all schemes are assessed on their own merit under the national planning legislation and all local policies.</p>
<p>Tandem parking and the use of garages/car ports within parking allocations causes parking issues, that will get worse over time.</p>	<p>Parking standards and requirements are assessed based on issues such as car ports and tandem spaces proposed as part of the parking provision.</p>
<p>The KCC 2006 Parking Standards are out of date and do not take into account changes in habitation modes since 2006. Suggest one parking space per bedroom is more pragmatic</p>	<p>As stated in the policy and supporting text, the guidance is used as a starting point. Further parking strategies will be undertaken and policy allows for most recent to be considered.</p>

<p>The wording in the text of the draft set out above although very well intentioned and worthy is rather ambiguous.</p>	<p>Comment noted.</p>
<p>Need to reduce car journeys first/incentivise people of out cars to more active travel modes/car sharing/taxi and make it affordable and accessible. Parking problems are a symptom of a much deeper malaise.</p>	<p>These issues are addressed within the Sustainable Transport policy.</p>
<p>Need to ensure the parking needs of people with disabilities are properly assessed and met.</p>	<p>Disabled parking spaces for residential properties and blue badges can be applied for through DDC / KCC</p>
<p>Need to invest in enforcement as nuisance parking causes congestion and contributes to the worsening of air quality if people have to drive around looking for parking spaces.</p>	<p>Comment noted.</p>
<p>Deal Town Council would welcome being involved in the proposed consultation on the District's stated intention of updating its Parking Strategy.</p> <p>It is noted a Parking Strategy is to be undertaken. On-street parking problems in Dover, as a result of developments in Dover not having to provide off-street parking, needs to be addressed.</p> <p>The referenced SPD was last updated in 2008 and inevitably does not reflect current patterns of car ownership and usage, much less plan ahead for future trends. DDC should conduct a survey of car ownership and usage across the district to ensure that policy remains relevant for current conditions in the very least. An appropriately robust and aspirational approach should then be proposed that can actually look ahead throughout the life of the plan.</p> <p>DDC should propose a suite of policies that demonstrates an understanding of our very specific local issues - ranging from unadopted rural lanes, village bypasses and trunk road access to one of the busiest ports in the world, rather rely on the KCC SPD.</p>	<p>Noted</p>
<p>Addition needed; to comply with the Kent and Medway Energy and Low Emissions Strategy, applicants should limit off-street parking to space for a maximum of 2 cars per dwelling.</p>	<p>Unable to locate reference to parking standards in quoted document.</p>
<p>Kent Police have made a number of comments about the design of parking areas. See DLP1534 for full comments.</p>	<p>Design matters are addressed in the placemaking chapter.</p>

<p>The statement that residential development with nil parking will be encouraged where appropriate is too vague and a full policy should be established in order to provide guidance on applications.</p> <p>Greater emphasis and effort needs to be given in supporting new developments with no car parking provision.</p> <p>Clause relating to no parking provision is unrealistic. It will allow applications to avoid the reality of current transport use. It is a clause for increasing pressure on the adjoining areas on-street parking provision. There must be some parking provision on-site.</p> <p>Agree with the approach to consider the local circumstances. However would urge that the acceptance of car free development by the Council does not hinder applications which do not propose car free schemes.</p>	<p>Comments noted</p>
<p>Consideration should be given to an overarching parking policy for Dover Town Centre to complement the proposed Dover Fastrack project, which seeks to discourage unnecessary car-based journeys between Whitfield and Dover Town.</p> <p>Parking provision - With safe active travel routes and enhanced public transport provision this stance seems out of date in the context of bold/radical plans for addressing climate change.</p>	<p>A parking standards review will be undertaken. The policy should also be read alongside the strategic transport policy, and sustainable travel policies.</p>
<p>It is possible for car free development to be encouraged within the Town Centre where existing and future controlled parking zones are present.</p>	<p>Noted.</p>
<p>For industrial, office and retail developments it should be clear what floorspace is referred to be that net or gross / internal or external floorspace.</p>	<p>The KCC KMSP sets out the floorspace by use class.</p>
<p>Policy should make reference to cycle parking cross referring to DM4 f. Also the supporting text should identify that KCC cycle parking standards and guidance remain for now in the 2006 document not the KDG.</p>	<p>Cycle standards are set in the KCC Vehicle Parking Standards 2006.</p>
<p>Public street parking unfortunately will be needed to discourage residents from owning more than one family car with the second being charged at a premium rate over the first. Commercial Vehicles should be exempt. And all of the Urban area</p>	<p>Proposed change to policy to state that CPZs will be considered if appropriate.</p>

should be classed as parking Zone (A). This will encourage other forms of travel.	
Policy DM30: It is noted that the policy does not cover loss of car parking on existing development, such as homes. The loss of residential parking could result in greater on-street parking in surrounding areas. It is noted that the policy supports development with no parking provision where it is located in easy walking distance of a range of services and facilities. This may not necessarily reduce the need for car parking and could result in greater on-street parking in neighbouring areas.	Comments noted. The policy will apply to all applications for planning permission, whether this be new development or alterations. Change proposed to supporting text to clarify.

Summary of Proposed Changes

- Supporting text will be updated to explain that policy requirement applies to all new development and any existing uses retained.
- Policy will be updated to state that CPZs will be applied where on-street parking issues occur
- Policy will be updated to add 'or any subsequent guidance' after reference to KCC parking standards which will enable long term effectiveness of policy

Note: In the Regulation 19 Plan Policies DM31 – Providing Open Space, DM32 - Sports Facilities and Playing Pitch Provision, DM33 – Protection of Open Space and DM35 – Community Facilities have been moved to the Placemaking Chapter from the Transport and Infrastructure Chapter.

DM Policy 31: Providing Open Space (Reg 19 - Moved to Place Making Chapter as Policy PM3)

In total 15 representations were made on this policy by 15 consultees.

Representations were received from:

Full Name	Organisation	Agent	Comment ID
Mr Jamie Pout			DLP531
Ms Christine Haggart	Ash Parish Council		DLP1209
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1899
Katy Wiseman	National Trust		DLP1604
Mr Nathan Burns	Natural England		DLP1444
Derek Leach	The Dover Society		DLP3037

Ms Sarah Gleave	Dover and Deal Green Party		DLP2836
Barbara Cooper	Kent County Council		DLP1752
Baypoint Club		Hume Planning Consultancy Ltd	DLP1621
Mike Eddy	Walmer Parish Council		DLP2023
Kelly Lawrence	Deal Town Council		DLP2146
Jay Ingram	My/PT		DLP2136
Caroline Austin			DLP2245
Thomas Patrick Johnstone			DLP2675
Ms Bridget Fox	The Woodland Trust		DLP1134

10 respondents stated that they agreed with the policy, 1 respondent stated that they objected to the policy and 4 didn't say whether they agreed or objected to the policy.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Policy is generally supported.	Comment noted
Policy should be expanded to make specific reference to access to the natural environment and to woodland. Refer to Natural England's Accessible Natural Green Space Standard and The Woodland Trust's Woodland Access Standard.	Natural and semi-natural green space are considered within the Green Infrastructure Policy
Policy needs to refer to the maintenance of open spaces and play areas.	Policy refers to the need for a governance strategy which would set out how the open space should be maintained over its lifetime.
Amenity green space should be provided in developments of less than 40 houses.	The policy requirements are evidenced from the open spaces strategy. Developments of 25 houses will be required to provide a LAP which will be an area of amenity green space.
Local Plan should refer to the need to secure investment to enhance and improve Aylesham Cemetery. This would meet the need for future burial provision in the District.	St.Peters Church and cemetery is identified as Public Open Space which requires enhancement and this will be included within the IDP. Development proposals near to the site can then be requested to provide contributions

	through S106 towards this, where applicable.
COVID-19 pandemic has highlighted the need for local, accessible, usable green space.	Comments noted
The standards set out in DM Policy 31 should be seen as the barest minimum, and this should be made clear in the policy.	The evidence for the standards in the local plan is set out in the Open Space Assessment Report 2019.
Welcome the recognition of the Local Green Spaces designated in Worth Neighbourhood Development Plan, but disappointed that they did not fully appreciate all the details in this document.	Proposed Change – Local Green Spaces, including those in adopted Neighbourhood Plans, will be referenced in the Local Plan policy for Protection of Open Space
Natural England and KCC support the policy.	Comments noted
Support the proposed expansion of Betteshanger Park through the development of Cottington Lakes to create vital green infrastructure and a much-needed link into Deal.	Comments noted
Object to para c) reference to private management company – request the wording be altered to cover the management of the facilities for the life of the development.	Criteria C) is already detailed with regards to private management companies, their governance and that the strategy must set out how the facilities will be managed over time.

Summary of Proposed Changes

- No significant changes are proposed to this policy

DM Policy 32: Playing Pitch Strategy (Reg 19 - Moved to Place Making Chapter as PM4 and renamed as Sports Provision)

In total 7 representations were made on this policy by 7 consultees. Representations were received from:

Full Name	Organisation	Agent	Comment ID
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1900
Jo Edwards	Sport England		DLP1682

Derek Leach	The Dover Society		DLP3038
Ms Sarah Gleave	Dover and Deal Green Party		DLP2837
Baypoint Club		Hume Planning Consultancy Ltd	DLP1622
Karen Rice	Deal Betteshanger & Walmer RFC		DLP2088
Kelly Lawrence	Deal Town Council		DLP2147
Mike Eddy	Walmer Parish Council		DLP2024

6 respondents stated that they agreed with the policy and 1 neither agreed nor objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Section 106 regulations are to deliver playing pitches but will need guarantees for their ongoing provision for maintenance.	Management and maintenance of facilities will also be addressed through S106 agreements
This policy requires developments of 10 or more dwellings to support outdoor sports facilities. Again this would be through Section 106 Agreements. As this Parish Council owns a sports field which rates very low quality, according to the Open Space Assessment topic paper, this policy is strongly welcomed.	Comments noted
Consideration should be given to the provision of other exercise facilities such as outdoor gyms, skateparks, and multi-use areas.	These provisions are included within the open space definition
Sport England has commented that the published PPS on the Council’s Sport and leisure Strategies page dates from 2015 and so policy should refer to the one finalised in June 2020.	The 2020 PPS is available to view on the new local plan website, under evidence base. However, we will update the council’s website too.
Sport England recommend that reference is also made to the Local Football Facilities Plan prepared by the Council and Football Foundation to	The supporting text for the policy has been updated to refer to the Local Football Facilities Plan

<p>identify priority projects https://localplans.footballfoundation.org.uk/local-authorities-index/dover/dover-executivesummary/ .</p>	
<p>Sport England recommend that policy refers to improvement of existing provision as well as new.</p>	<p>Policy will be updated to refer to improvement of existing provision as well as new.</p>
<p>Sport England recommend that a policy reference is also needed in relation to new / improved indoor facilities arising from new development. Sport England's Sports Facility Calculator is a useful tool for quantifying requirements. Is the Council going to update its indoor built facilities strategy? Sport England would recommend that this is done in accordance Sport England's Assessing Needs and Opportunities for Sports Provision guidance https://www.sportengland.org/how-we-canhelp/facilities-and-planning/planning-for-sport?section=assessing_needs_and_planning_pitch_strategy_guidance</p>	<p>This policy will be updated to also deal with indoor sports facilities and we are considering the need for the strategy to be updated.</p>

Summary of Proposed Changes

- Policy will be updated to address needs for Indoor Sport provision
- Policy will be updated with regards to improvements of existing provision in addition to new provision

DM Policy 33: Protection of Open Space (Reg 19 - Moved to Place Making Chapter as Policy PM5 – Protection of Open Space, Sports Facilities and Local Green Space)

In total 16 representations were made on this policy by 16 consultees. Representations were received from:

Full Name	Organisation	Agent	Comment ID
Mr David Sims			DLP495
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1901
Beat Hochstrasser			DLP1125
Jo Edwards	Sport England		DLP1683

Cllr Peter Walker	DDC WARD - Aylesham, Eythorne and Shepherdswell		DLP2049
Andrew Howard-Grigg	Temple Ewell Parish Council		DLP2934
Derek Leach	The Dover Society		DLP3039
Ms Sarah Gleave	Dover and Deal Green Party		DLP2838
Sue Lamoon			DLP2967
		Plainview Planning	DLP1965
Baypoint Club		Hume Planning Consultancy Ltd	DLP1623
Kelly Lawrence	Deal Town Council		DLP2148
The Land Trust		Lee Evans Partnership	DLP1946
Peter Jailler			DLP2372
Clive Chandler			DLP2968
Kim Horwood			DLP3476

7 respondents stated that they agreed with the policy, 5 respondents stated that they objected to the policy and 4 didn't state whether they agreed or objected.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Agree with the proposal to remove the Church Hill Amenity Green Space (Appendix 1-Open Space Long List Recommendations – Line 372) as it fails to meet the required criteria.	Comments noted
Request that the Green Space known as "Players Corner" at the junction of London Road/Templeside which contains a War Memorial Stone is added to the list of open spaces.	The comments on specific open spaces in the District will be considered as part of the review of the open space study.
Suggestions of green spaces: Bayview road should be the boundary onto green space. likewise, Claremont and Balmoral road, the horse paddocks KIN008. Anything within half a mile of Kingsdown wood because of the wildlife and badgers that feed in that area. The campsite and holiday park because they	Local Green Space nominations will be assessed for designation within the Local Plan.

are vital to the economy they bring to the village.	
The entire grounds of the Walmer and Kingsdown Golf should be within the AONB, if not already. Should be designated as a Local Green Space.	
The Otto Bottom/Oldstairs Road Valley running between St Margarets and Kingsdown to Oldstairs Bay is reputed to be the only natural unspoiled valley leading to the sea in Kent. This area should be protected as an AONB and Local Green Space.	
Amend open space designation covering land 'Off Mill Lane' to remove the area outlined in red in the accompanying representation.	
Question whether Land On The East Of Marlborough Road Deal CT149LE should be allocated as protected Open Space given the site is within private ownership, located off a private access road and is not therefore accessible to the public. Request that allocation is removed prior to Reg 19. See DLP1965 for full representation. Also submitted as part of call for sites.	
Welcome that all listed open spaces in St Margaret's are recommended for retention.	Comments noted
An ecological survey should be undertaken before any loss of open space is considered. If it is of high biodiversity of ecological importance loss of the space should not be permitted.	Issues relating to impact on biodiversity are dealt with under SP16, SP17 and DM38.
Protection of tranquil areas should be added to this policy.	Tranquillity will be referred to in the supporting text for the policy in terms of local green space.
Open Space quantity standards should include "Desired quantity standards" as well as "Minimum Thresholds". This would allow developments to be benchmarked. These benchmarks	Quantity standards for open space are set out in DM31 providing open space. For natural and semi-natural green

should reflect Green Flag Award accreditation.	space this is considered within the Green Infrastructure Policy.
The recommended minimum area thresholds and desired quantity standards for natural & semi-natural greenspace should be included within the local plan if the plan is to be fit for purpose.	
The local plan should reference how to overcome the detrimental effects of green space fragmentation. This could be through green corridors. There is also an opportunity to produce specialist standards in this area.	Opportunities around the creation of green corridors will be looked at as part of the recommendations of the council's Green Infrastructure Strategy.
An alternative policy could be to not define the conditions by which a surplus may exist, allowing assessment to be undertaken on a case-by-case basis.	The Regulation 18 draft local plan, sets out a number of alternative approaches to the protection of open space, however the policy proposed provides a sound, evidenced approach to the protection of open space and provides applicants with clear guidance in respect of how the policy should be applied. Communities can nominate land for Local Green Space designation through the Local Plan and Neighbourhood Plans
A further reasonable policy alternative could be to designate such land that may be identified by the community through this regulation 18 consultation, and is shown to meet the Criteria of NPPF paragraph 100. Whilst no such sites are currently known to the Council, it is reasonable to anticipate sites meeting the criteria for Local Green Space designation may be put forward through this regulation 18 consultation. The extent to which they are will inform the final policy position.	
Agree with the third alternative proposal that local communities should have the right to identify open spaces to be protected.	
Support the continued designation of the Baypoint Sports Club, Ramsgate Rd as open space	Comments noted
Policy is positively worded and flexible and this wording should be retained.	Comments noted
Fort Burgoyne is designated open space. Support criteria (b) which will	Comments noted

allow for a case to be presented that any development proposals involving the partial loss of open space can be justified where any replacement facility can be demonstrated to provide a net benefit to the community. See DLP1946 to read comment in full.	
With regards to playing fields a robust assessment should relate to the Council's new PPS as the robust evidence base and follow para 97 of the NPPF and Sport England's Playing Field Policy https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy	Noted
How will the policy be implemented?	The implementation section under the policy will set out how the policy will be implemented going forwards.
The latest evidence documents do not seem to provide justification for sites which offer "amenity value" only.	The evidence base does not seek to justify inclusion of Open Spaces. Informal green spaces which offer amenity value or add to local character are an important aspect of open space, especially within urban environments.

Summary of Proposed Changes

- Policy will be amended to include designation and protection of Local Green Spaces – title will be amended to reflect this
- Further detail will be added around implementation of the policy

DM Policy 34: Community Facilities (Reg 19 - Moved to Place Making Chapter as Policy PM6 – Community Facilities and Services)

In total 11 representations were made on this policy by 11 consultees.

Representations were received from:

Full Name	Organisation	Agent	Comment ID
Mr Ross Miller	Masterton Robin Designs Ltd		DLP514
Bethan Garrity			DLP575
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1902

Cllr Edward Biggs	DDC WARD - Town and Castle		DLP2002
Mr Tom MRTPI			DLP1210
Derek Leach	The Dover Society		DLP3040
Ms Sarah Gleave	Dover and Deal Green Party		DLP2839
Baypoint Club		Hume Planning Consultancy Ltd	DLP1624
The Land Trust		Lee Evans Partnership	DLP1947
Kelly Lawrence	Deal Town Council		DLP2150
Kim Horwood			DLP3477

10 respondents stated that they agreed with the policy and 1 respondent neither agreed or objected.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Strong support for policy.	Comments noted
There should be a policy on neighbourhood plans to ensure that their wishes are actively considered in all future district and land allocation plans.	Neighbourhood Plans will be referenced within the Reg 19 Local Plan. However, as they become part of the Development Plan upon adoption and sit alongside the Local Plan, they do not need to be covered a LP Policy.
Local councils should be given a much greater say over what community facilities are needed.	A community facilities topic paper will be produced to support the plan. This, alongside the Infrastructure Delivery Plan will be available for public consultation. Town and Parish Councils in particular will be invited to set out specific needs.
Local communities should be included in planning as early as possible to ensure they get what they need.	Comments noted
Welcome emphasis given to local communities to identify community assets and needs.	Comments noted
Add (buildings or land or woodland) after retain, enhance and maintain community facilities.	Comment noted, however, a site with a community function is covered by this policy. Open Spaces and woodland are covered by the Open Spaces and environment policies.

The Council should protect all amenities that support social gatherings, including pubs, libraries, sports and social centres.	Issues relating to implementation and uses covered by the policy will be covered in the updated policy.
No definition of community facility is provided in the policy. Further specification of uses that may generally fall under the heading of a community use should be referenced in the policy – in line with para 20 (c) of the NPPF	The supporting text of the policy will be amended to include a list of community services and facilities. This also includes leisure and cultural uses.
Policy should be expanded to give specific support for new community facilities where they make appropriate re-use of existing buildings/premises, are suitably located and assist with wider regeneration objectives, particularly where heritage assets are involved and conversion can assist with securing their long-term future.	Comment noted. Policy will be updated to reflect requirements for enhancement to existing or new community facilities
Where is the up-to-date evidence to support the policy?	A community section will be included in the IDP.
Community facilities, should also include cultural facilities such as the district's cinemas, music venues and theatres, and should be protected by policy from unnecessary loss.	Proposed change - Criteria will be added to the policy to deal with the loss of community facilities.
Policy should include criteria to deal with the loss of community facilities.	

Summary of Proposed Changes

- The policy and supporting text will be updated to address the loss of existing facilities and the provision enhancements to existing or for new facilities
- Community facilities will be included in the IDP as part of the evidence to support the policy

DM Policy 35: Digital Technology (Reg 19 Policy TI5)

In total 10 representations were made on this policy by 10 consultees.

Representations were received from:

Full Name	Organisation	Agent	Comment ID
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Mr Ross Miller	Masterton Robin Designs Ltd		DLP515
Mr Mark Burton			DLP788
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1903
Mrs Julie Bates			DLP1304
Cllr Edward Biggs	DDC Ward Councillor DDC WARD - Town and Castle		DLP2003
Derek Leach	The Dover Society		DLP3041
Ms Sarah Gleave	Dover and Deal Green Party		DLP2840
Kelly Lawrence	Deal Town Council		DLP2151
Barbara Cooper	Kent County Council		DLP1753
	The Land Trust	Lee Evans Partnership	DLP1948

6 respondents stated that they agreed with the policy, 2 respondents stated that they objected to the policy and 2 respondents didn't state whether they agreed or objected to the policy.

Summary of Representations – Main Issues

(Please note that some of the comments summarised here were made in other sections of the chapter)

Summary of representations	Councils response / Proposed change
KCC recommends that reference to superfast connections needs to be replaced with a reference to gigabit capable connections to be consistent with national policy.	Policy wording changed to reference 'gigabit-capable' connections and not 'superfast'.
Highways England is supportive of the DDLP policy towards Digital Technology as it can support the need to work from home and thereby reduce trips. Digital Technology should also be considered in terms of public transport and providing communication options (i.e. RTPI, public transport apps, car share link, cycle schemes) for new development and not be limited to broadband capability. Highways England would also consider that digital infrastructure around public transport should be supported to provide better connectivity for users	Comment noted. Proposed change to add supporting comments related to digital infrastructure improvements to public transport.

<p>and residents. This may consist of real time passenger information, updated web pages or apps.</p>	
<ul style="list-style-type: none"> • Internet speed in Aylesham is poor compared to other areas. • High speed broadband is weak in the rural areas and mobile phone coverage is variable even within villages. • Should be a requirement to improve existing digital infrastructure in the wider community as well as providing new. • Good broadband is key for home working and is a key decider when deciding where to live/ start a business etc. • Good digital infrastructure should be accessible for all. • It would help to start with digital technology (broadband connectivity), with in-settlement community hubs to support working from home (in the sense of not going to a place of work) • Fibre should be promoted over traditional telephone connections. • Government should invest in digital infrastructure. • Brief vague policy, lacking detail and supporting evidence. 	<p>Noted. This policy will apply to new development. However the governments Project Gigabit aims to improve existing rural connectivity and grants are available.</p> <p>Project Gigabit – Building fast reliable broadband for everyone in the UK (campaign.gov.uk)</p> <p>Project Gigabit Delivery Plan - Autumn Update (publishing.service.gov.uk)</p> <p>GigaHubs are also part of this initiative with up to £110m of government funding invested into providing gigabit connectivity to up to 7,000 rural public sector buildings including schools, GP surgeries, libraries and other public buildings.</p> <p>GigaHubs: key information - GOV.UK (www.gov.uk)</p>
<p>Prior to the commencement of developments assurances should be obtained from the digital providers of the infrastructure to confirm they are able to provide the required connections in a stated timeframe.</p> <p>Penalties or other sanctions should be used against developers that don't provide good digital connections</p>	<p>Conditions will be placed on developments which are permitted to require the infrastructure to be delivered.</p>
<p>Paragraph 9.59 indicates that BT Openreach will extend full fibre connection to the rural areas by the mid 2020s and mentions Kingsdown, Ripple and Ringwold among other settlements, but not St Margaret's. We trust that DDC will insist that St</p>	<p>BT openreach provide updates to the project here: Where and when we're building Ultrafast Full Fibre broadband Openreach. This area of the</p>

<p>Margaret's is included in the connection of FTTP in the near future.</p> <p>Sceptical about the timeframe for BT Open Reach to improve infrastructure.</p>	<p>district is expected to be built between April 2021 and December 2026.</p>
<p>KCC are generally supportive of this policy, although would recommend the inclusion of an exception for very isolated premises which maybe a long way off the existing fibre network. Alternative solutions can sometimes be sought such as fixed wireless for those in exceptional circumstances.</p> <p>A “one-size fits all approach” is not appropriate as retro-fitting existing sites, particularly where sensitive heritage assets are involved, may not be appropriate. The policy should reference an ambition for this standard to be reached but that statements are submitted which demonstrate what can actually be achieved based on individual circumstances</p>	<p>PROPOSED CHANGE Policy and supporting text will be updated relating to exceptional circumstances</p>

Summary of Proposed Changes

- Policy and supporting text to be updated to reflect that in exceptional circumstances such as isolated locations, the policy requirements do not have to be met but this will have to be detailed within the Digital Infrastructure Statement
- Policy will be updated to reflect support for digital infrastructure improvements to public buildings and sustainable travel
- Policy will be updated to reflect support for 5G mobile in accordance with national and local policy

Comments on Evidence Base Documents for this chapter:

Summary of representations	Councils response / Proposed change
<p>The EA have made comments on the Infrastructure Topic Paper in relation to waste water treatment facilities and water quality. (DLP1547)</p> <p>They recommend including wastewater treatment capacity among the infrastructures needed to support future proposal for new homes. This is particularly important for Dover DC, given that the district relies fully on groundwater abstraction for drinking water supply, and that groundwater recourses are already at high risk of degradation</p>	<p>Comment noted, Policy SP13 will be amended to list all types of infrastructure, including wastewater</p>

Highways England have made comments on the Infrastructure Topic Paper see rep DLP1781 for full comments.	Comments are noted. Most are included and responded to in above sections relating to transport modelling.
HE provided detailed Comments and actions on modelling to support the transport elements and implications of the emerging Local Plan	Comments have been noted and DDC will continue to work with HE on transport modelling
KCC made comments on the Infrastructure topic paper in relation to waste needs	This issue will be addressed in more detail within SP13 and the IDP/IDS
KCC made detailed comments on Transport Modelling	Comments have been noted and DDC will continue to work with KCC on transport modelling

Transport and Infrastructure – Regulation 19 changes to policy references and titles

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 13 – Infrastructure and Developer Contributions</i>	<i>SP11 – Infrastructure and Developer Contributions</i>
<i>SP 14 – Strategic Highway Infrastructure</i>	<i>SP12 – Strategic Transport Infrastructure</i>
<i>DM Policy 4 - Sustainable travel</i>	<i>TI1 - Sustainable Transport and Travel</i>
<i>DM Policy 29 - The Highway Network and Highway Safety</i>	<i>TI2 - Transport statements, Assessments and Travel Plans</i>
<i>DM Policy 30 – Parking Provision on new development</i>	<i>TI3 – Parking Provision on new development</i>
<i>DM Policies 31, 32, 33 and 34</i>	<i>Moved to Place Making Chapter</i>
<i>--</i>	<i>TI4 - Overnight Lorry Parking Facilities</i>
<i>DM Policy 35 – Digital Technology</i>	<i>TI5 – Digital Technology</i>

Chapter 10 - Design

In total 62 comments were made on the design chapter. A summary of the representations received and the council's response to these representations is set out below.

Representations on the Chapter

In total 10 general representations were made on this chapter by 9 consultees. Representations were received from:

Name	Organisation	Comment ID
Robin Green	Deal Society	DLP587
Julie Davies	CPRE	DLP829
Rosie Rechter		DLP947
Ms Penelope James	Dover and Deal Liberal Democrats	DLP1030
Mr Adam Wadey		DLP1293
Mr Alan David Steggall		DLP1199
Linda Mason	Kent Police	DLP1529
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1904, 1905
Mr Alan Byrne	Historic England	DLP1666

Summary of Representations – Main Issues

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Support the policies in the Design Chapter.	Comments noted
Support the introduction of design codes.	Comments noted
Agree with the issues and options identified.	Comments noted
Historic England are supportive of the policies in the design chapter and welcome the intention to prepare a Local Design Guide to support the application of the design policies.	Comments noted
CPRE support paragraph 10.20 and promotion of high-density development in Dover Town Centre where appropriate.	Comments noted
Photo at the start of the chapter would not comply with DM Policy 36. as it does not comply with Built form (b)	Comment noted
A Design tzar should be appointed by the Local Planning Authority.	The Kent Design Panel is utilised rather than one single officer.
Kent Police have highlighted a number of issues to note regarding designing out crime in new developments – see representation DLP1529 in full.	Comments noted
More emphasis on disabled access is needed in the design chapter/ policies.	With regards to disabled access, Strategic Policy 15 will be changed to address the issue of creating inclusive communities and DM Policy 36 Achieving High Quality
New buildings should be sustainable, zero-carbon, include heat pumps,	

	Design and DM Policy 37 Quality of Residential Accommodation will refer to the need to ensure developments are accessible by all.
Quality of housing in the District needs to be improved in general. New developments should fit into the environment in which they are located.	Issues relating to sustainable design and construction are addressed in DM Policy 2: Sustainable Design and Construction.
Flats currently lack adequate storage. Homes need to be made more spacious.	Policy PM2 requires the Nationally Prescribed Space Standards to be met.
Town Centres need to be redeveloped sensitively and should be pedestrian led, not car/van led.	Comments noted. There are specific policies in the plan in relation to Town Centres.
Brownfield development should be prioritised.	Comment noted

Representations on the issues identified

1 representation has been made on this section by 1 consultee. The representation was received from:

Name	Organisation	Comment ID
Dereck Leach	The Dover Society	DLP3042

The respondent agreed with the issues identified.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Paras 10.7 – 10.10. Agree with the aspiration but how will this be interpreted and delivered.	Comments noted. No changes proposed. The Regulation 19 Local Plan will address how policies should be implemented.

Representations on the options identified

2 representations will be made on this section by 2 consultees. The representations were received from:

Name	Organisation	Comment ID
Kevin Bown	Highways England	DLP1817
Ms Lesley Neil		DLP3213

The respondents didn’t state whether they support or object to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
HE noted the policy approach and that the justification for the approach.	Comments noted
Quality of design needs to be improved in the District. Questioned whether planners can be trusted to deliver good design.	Comments noted

Summary of Proposed Changes to Chapter

- No significant changes proposed – all issues raised are addressed in specific policies in the chapter

Strategic Policy 15: Place Making (Reg 19 Policy SP2 - Planning for Healthy and inclusive communities)

In total 20 representations were made on this policy by 19 consultees.

Representations were received from:

Name	Organisation	Agent	Comment ID
Peter Jull			DLP37
Mr Jason Jones-Hall	Pioneering Places East Kent		DLP896
Mr Jamie Pout			DLP532
Allison Burton	Dover Town Council		DLP1187
Seb Willett	Langdon Parish Council		DLP1257
Katie Miller	Kent Downs AONB		DLP1494
Linda Mason	Kent Police		DLP1511
Ms C Smith			DLP1138
Jason Ransley	Dover Harbour Board	Savills	DLP1236
Barbara Cooper	Kent County Council		DLP1754
Jo Edwards	Sport England		DLP1684
	The Church Commissioners	Deloitte LLP	DLP1699, DLP3594
	The Land Trust	Lee Evans Partnership	DLP1949
Mike Eddy	Walmer Parish Council		DLP2025
Kelly Lawrence	Deal Town Council		DLP2153
Ms Bridget Fox	The Woodland Trust		DLP1132
Mrs Christine Oliver			DLP1091

Kevin Bown	Highways England		DLP2637
Derek Leach	The Dover Society		DLP3043

3 respondents stated that they agreed with the policy, 4 respondents stated that they objected to the policy and 13 didn't state whether they support or object to the policy.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Support policy.	Comments noted
Housing density - Target should be 40-50 dwellings per hectare.	DM 36 takes a sufficiently flexible approach to density and encourages high density development in certain locations – no change proposed.
Sensitive use of materials is required in more rural settings exposed to the countryside.	Comments noted
Reference to cultural offer and infrastructure is needed.	Cultural infrastructure will be added to Strategic Policy 15.
The use of home zones/shared spaces should only be permitted when designs are backed by evidence and of the highest quality.	Comments noted
Include reference to "beautiful" and "economical to occupy".	Comments noted
Welcome an emphasis on local distinctiveness.	Comments noted
Case officers need to have the tools to challenge sub-standard design and placemaking. Greater enforcement powers are also needed to enforce against poor design.	Comments noted
More community engagement required in the design development process.	Comments noted
Support for a Dover District Design Guide. This should be based on local knowledge.	Comments noted
Object to use of private management companies to preserve public realm and landscaping in perpetuity. Only increases the cost of living in new developments.	Comments noted
Any road that is sufficiently accessible for a refuse collection vehicle is also wide enough for excess speed and nuisance parking. Impacts quality of life.	Comments noted

Greater co-ordination is required with KCC over adoptable highways. These need to be finished to a higher standard.	Comments noted
Split between Strategic Policy 15 and DM policy 36 is confusing and repetitive. The specific criteria should be moved into the DM policy and the strategic policy should focus on the overall high quality expectations. The DM Policy should require that development within the AONB should have regard to the Kent Downs AONB Landscape Design Handbook.	Strategic Policy 15 will be re-worked to focus on planning for healthy and inclusive communities, rather than just design. The criteria that were previously in SP15 will be incorporated in Policy DM 36.
KCC have recommended that there is more emphasis on health within the Local Plan. See representation DLP1754 in full.	
Kent Police have highlighted a number of issues to note regarding designing out crime in new developments – see representation DLP1511 in full.	Comments noted
The policy needs to go further by adding specific requirements that developers must meet in relation to the protection of endangered species.	Policy DM 36 will be amended to include reference to the need to support habitat conservation and creation for wildlife.
Connecting design and planning policies to climate change policies and mitigation provides an integrated approach which could be greater reinforced within this Local Plan.	The Place Making chapter will refer to cross cutting issues and highlights other policies (including climate change) that relate to the design policies.
KCC supports the inclusion of stewardship to maintain and manage developments in the long term.	Comments noted
KCC recommends that it is blue and green infrastructure which should be brought into streets, open and public spaces.	DM 36 will be updated to refer to green and blue infrastructure.
Ensure that the heritage of a place is put at the centre of any development proposals.	DM 36 will be updated to refer to the need to demonstrate an understanding and awareness of the context of the area (including historical character). It is considered that other issues relating to conserving and enhancing built heritage are dealt with in the Heritage policies.
KCC recommends the following clause is added. Heritage: 1. Demonstrate an awareness of the historic character of the area and show how the development will fit into existing historic landscape patterns; 2. Conserve and enhance existing historic character, reusing heritage assets where possible.	

<p>This would also support recommendation R1 and R2 in the adopted Dover Heritage Strategy.</p>	
<p>The historic environment should be considered and reflected in development master plans.</p>	
<p>The Kent Historic Landscape Characterisation (2001) should be used to inform decisions taken regarding the landscape character of the District.</p>	<p>The Council's Landscape Character Assessment 2020 covers issues relating to heritage in the context of the wider landscape.</p>
<p>KCC have stated that Local Plan should consider the delivery of necessary cultural infrastructure to support sustainable development in the district. See representation DLP1754 in full.</p>	<p>Cultural infrastructure will be referred to in Strategic Policy 15.</p>
<p>Sport England have commented that it may be useful to cross reference their revised guidance 'Active Design' in the policy - https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-costguidance/active-design</p>	<p>SP 15 will be amended to include a greater reference to health and emphasise the need to deliver healthy and inclusive communities.</p>
<p>Sport England have highlighted a number of issues to note regarding Active Design principles, including a model policy text – see representation DLP1684 in full.</p>	
<p>Developers/ site promoters should be consulted as part of the production of a design code</p>	<p>Comments noted</p>
<p>Design codes should not be overly prescriptive to maintain a level of flexibility when designing new development.</p>	<p>Comments noted</p>
<p>Amend policy to include a statement that all developments must demonstrate that sustainably sourced materials are used in construction of any new build.</p>	<p>Policy SP1 – Planning for Climate Change sets out the Council's approach for climate change and sustainable construction.</p>
<p>Highways England support place making principles that encourage localised trips by sustainable or active modes and discourage the use of private vehicles.</p>	<p>Issues relating to sustainable travel are covered in SP 15, DM Policy 4 and DM Policy 36.</p>
<p>KCC recommends that there must be a prioritisation of sustainable transport and accessible active travel opportunities within all developments within this policy.</p>	

Policy should include a specific reference to trees. See the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019)	DM 9 deals with trees and tree planting in new development.
Policy should promote innovative design and radical ideas and solutions e.g. community composting, EV car sharing schemes, community energy generation.	Comments noted
Too much focus on perpetuating the same design as existing.	Comments noted
How and who will be appointed on the Design Review Panel? The Design Review Panel must be open and transparent and involve community representatives.	Issues relating to implementation will be covered in the updated Place Making chapter.

Summary of Proposed Changes

- A change will be proposed to this Strategic Policy to rename it **Planning for Healthy and Inclusive Communities** which will part replace SP15 and set out the Council's strategy for supporting the creation of healthy, inclusive and safe communities in the District.
- Other aspects of this policy will be merged with DM36 on design.
- Policy will reference cultural infrastructure

DM Policy 36: Achieving High Quality Design (Reg 19 Policy PM1 – Achieving High Quality Design Placemaking and Provision of Design Codes)

In total 18 representations were made on this policy by 17 consultees.

Representations were received from:

Name	Organisation	Agent	Comment ID
Bethan Garrity			DLP573
Jason Ransley	Dover Harbour Board	Savills	DLP817
Seb Willett	Langdon Parish Council		DLP1259
Barbara Cooper	Kent County Council		DLP1756
Linda Mason	Kent Police		DLP1512
	Church Commissioners	Deloitte LLP	DLP1700, DLP3595
Jane Cook	St Margaret's-at-Cliffe Parish Council		DLP1906

Katie Razzell	Aylesham Parish Council		DLP1938
N Warden	Kent Tree and Pond Partnership -Dover District		DLP2201
Mike Eddy	Walmer Parish Council		DLP2027
Kelly Lawrence	Deal Town Council		DLP2154
Julie Davies	CPRE		DLP2634
Ms Bridget Fox	The Woodland Trust		DLP2635
Mrs Christine Oliver			DLP2636
	The Land Trust	Lee Evans Partnership	DLP2638
Derek Leach	The Dover Society		DLP3045
Ms Sarah Gleave	Dover and Deal Green Party		DLP2841

7 respondents stated that they agreed with the policy, 1 respondent stated that they objected to the policy and 10 didn't state whether they support or object to the policy.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
More green space should be included within developments.	Comments noted
Home zones are unsafe and cars still have priority. These roads should give priority to pedestrians first (as per Kent design guide)	Comments noted
Consider that the typical development density of 30-50 net dph quoted in the policy is too low for a central location such as this and that the policy should recognize that higher density development will be considered acceptable at Dover Waterfront.	DM 36 takes a sufficiently flexible approach to density and encourages high density development in certain locations – no change proposed. Policy states that development needs to be of an appropriate density (typically between 30 – 50 net dwellings per hectare), this wouldn't prevent lower or higher density schemes coming forward as long as they were appropriate for the site/ location.
Density of between 30 -50 net dwellings per hectare could be too high in some rural locations	
None of the Strategic Sites and 61 of the Non-Strategic sites are estimated to achieve 30 or more dwellings per hectare. And 34 have densities of less than 20 dwellings per hectare. Many of the sites with low densities are in the villages / rural area where sites will need to provide landscape buffers and	

other infrastructure. There is the strong possibility that these requirements will result in sites needing to provide larger, more expensive homes and not meet local housing needs.	
Support not having overly prescriptive densities. A design led approach should be adopted to density. The higher density number should not become the maximum density for a site.	
Case officers need to have the tools to challenge sub-standard design and placemaking. Greater enforcement powers are also needed to enforce against poor design	There will be an implementation section for each policy in the Reg 19 to assist case officers with decision making.
Policy should refer to the new Kent Design Guide.	The supporting text to Policy PM1 refers to the Kent Design Guide.
Policy should promote the role of design as a tool to encourage communities to be active and promote positive health and wellbeing choices.	SP 15 will be amended to refer to the promotion of health and well-being and active modes of travel.
Policy should highlight the importance of providing well connected streets with high quality pedestrian and cycle infrastructure.	Comments noted, this is a theme throughout the plan.
Policy should refer to Conservation Area Appraisals	Amended Policy to refer to Conservation Area Appraisals.
Kent Police have highlighted a number of issues to note regarding designing out crime in new developments – see representation DLP1512 in full.	Comments noted
To accommodate people with a variety of needs, any new development must ensure a good proportion of housing built with future adaptations in mind. In addition, an ageing population means housing that is able to accommodate wheelchairs etc must be included.	DM 37 sets out the council's requirements for the provision of accessible housing. DM 11 deals with type and mix of housing.
All new development must go above and beyond the minimum requirements of land allocated to formal and informal outside spaces, including play parks, community gardens and sports fields.	DM 36 and DM 37 cover the provision of open space and play facilities. As does, DM 31.
No mention of sustainability in the policy.	Issues relating to sustainable design and construction are addressed in DM

	Policy 2: Sustainable Design and Construction.
Point g – remove 'where appropriate'	Removed 'where appropriate' from point g.
Refer to the need for cultural infrastructure.	Cultural infrastructure is now referred to in Strategic Policy 15.
Integrating trees and green spaces into developments early on in the design process minimises costs and maximises the environmental, social and economic benefits that they can provide. Recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).	DM 9 sets out the council's strategy to tree planting. The Landscape Character Assessment 2020 also looks at opportunities for woodland creation.
The Woodland Trust supports a target of 30% canopy cover for development sites, including tree-lined streets, community woods, parks and gardens, to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease, and by new planting to support green infrastructure.	DM 38 deals with Biodiversity Net Gain and DM 9 deals with trees and tree planting in new development. The 20% BNG requirement for Kent is not yet evidenced and the current national requirement is 10%.
Policy should refer to the need to enhance biodiversity in line with Kent Nature Partnership commitment to 20% enhancement and ensure that existing trees on developments are protected.	
This policy should be applied to a redesign of the paving and street furniture in Market Square, Cannon Street and Biggin Street.	Comments noted
If public spaces aspirations are to be achieved in Dover Town, then poorly maintained buildings will require Section 215 of the 1990 Town and Country Planning Act to be vigorously enforced. Section 215 is designed as a valuable regeneration tool.	Comments noted
Questioned whether the policy applied to change of use.	This would depend on the type and nature of the change of use. Opportunities for achieving high quality design are promoted.

Summary of Proposed Changes

- Policy will be amended to incorporate parts of SP15 Placemaking to create a more detailed design policy
- More emphasis will be added relating to habitat conservation and creation for wildlife and reflect the need for street trees.
- The term ‘where appropriate’ will be removed
- Reference will be added to Conservation Area Appraisals

DM Policy 37: Quality of Residential Accommodation (Reg 19 Policy PM2 – Quality of Residential Accommodation)

In total 11 representations were made on this policy by 11 consultees. Representations were received from:

Name	Organisation	Comment ID
Ms Christine Haggart	Ash Parish Council	DLP1216
Bethan Garrity		DLP574
Seb Willett	Langdon Parish Council	DLP1261
Linda Mason	Kent Police	DLP1513
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1907
Barbara Cooper	Kent County Council	DLP1757
Mike Eddy	Walmer Parish Council	DLP2029
Kelly Lawrence	Deal Town Council	DLP2155
Derek Leach	The Dover Society	DLP3048
Ms Sarah Gleave	Dover and Deal Green Party	DLP2842
Sarah Sweeney	Kitewood	DLP3580

3 respondents stated that they agreed with the policy, 3 respondents stated that they objected to the policy and 5 didn't state whether they support or object to the policy.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
Support policy approach. The Plan should adopt the highest possible standards for private and affordable housing.	Comments noted
Support the policy but greater tools/ powers are required to ensure compliance.	The implementation section of the policy will set out further details.
Questioned that DM Policy 37 does not include any sustainability measures.	Issues relating to sustainable design and construction are addressed in DM Policy 2:

	Sustainable Design and Construction.
Questioned whether the policy also applies to change of use and whether reference to this should be inserted into the first line.	This would depend on the type and nature of the change of use. The policy specifies new residential development, so would be assessed on a case by case basis.
The Kent Design Guide and Secured by Design guidance should be considered and referenced.	Reference to the Kent Design Guide and Secured by Design guidance is already made in DM Policy 36 and we don't feel the need to repeat here.
Kent Police have highlighted a number of issues to note regarding designing out crime in new developments – see representation DLP1513 in full.	Comments noted
Point c should be amended to require development to be in excess of the government's latest Nationally Described Space Standards in respect of Internal accommodation.	The Council can only require development to meet the Government's Nationally Described Space Standards, it cannot require anything further in policy terms.
Kent County Council welcomes reference to Approved Document M: Access to and use of buildings and would urge the District Council to consider emerging guidance on the matter of design.	Comments noted
Point d – Accessibility Standards - some schemes in rural villages will be below the 19 dwelling threshold, yet the need for provision of homes that are fully accessible are still needed.	The policy requires all development to meet the accessibility standards set out in Part M4 of the Building Regulations. The evidence to support this approach is set out in the SHMA.
Point d should be amended to require that on all developments at least 25% of the development shall comply with building regulation M4(3) (wheelchair accessible homes) with the remaining development to be built in compliance with building regulation M4(2).	In respect of the Building Regulation optional requirement M4 (3), in accordance with national guidance this can only be required on units where the local authority has nomination rights, i.e. within the affordable rented element of a development. Here, the Council will require 5% of the total dwellings to meet this standard. This approach has been tested through the Whole
Support the aspiration of DDC to secure both M4(2) and M4(3) dwellings.	
Support the proposed 5% of M4(3) dwellings (on schemes above 20 dwellings). Do not consider there to be an evidenced need for all	

other dwellings to be M4(2) compliant. Referenced Examination of Hambleton Local plan, Inspector’s Report (18 Jan 2021 - para 26). Recommend that the policy is amended to state a percentage for M4(2) in line with the SHMA requirements.	Plan Viability Assessment to ensure it is deliverable.
Questioned the need to refer to Building Reg M4(2) in the Local Plan	
Clarification to the requirement of play space is needed - particularly around the type of play equipment. This should be determined on a site by site basis and be incorporated with natural landscaping/ GI.	The nature of the play space provided on sites should be determined as part of the planning application process and will be dependant on a number of factors. This is covered by the Providing open space policy.
Kent County Council recommends consideration of how to ensure safe and reasonable home working areas.	Policy PM1 includes requirement to enable opportunities for home working.
Kent County Council recommends that dementia friendly design should be considered within the Local Plan.	With regards to the need for dementia friendly design, the policy has been updated to refer to the provision of accessible, flexible, and adaptive homes to meet the needs of an ageing population. SP 15 will also been re-worked and focus on planning for healthy and inclusive communities, which also addresses this issue.

Summary of Proposed Changes

- The criteria will be refined to reduce repetition
- Additional criteria will be included to ensure that homes create healthy living environments in light of the pandemic
- Will be amended to include measures to ensure fire safety are incorporated that the planning stage for high-rise development.

Placemaking – Regulation 19 Changes to Policy names and references

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
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<i>SP 15 – Place Making</i>	<i>SP2 - Planning for Healthy and inclusive communities</i>
<i>DM Policy 36 – Achieving High Quality Design</i>	<i>PM1 – Achieving High Quality Design placemaking and provision of Design Codes</i>
<i>DM Policy 37 – Quality of Residential Accommodation</i>	<i>PM2 – Quality of Residential Accommodation</i>
<i>DM Policy 31 – Providing open space</i>	<i>PM3 – Providing open space</i>
<i>DM Policy 32 – Playing pitch strategy</i>	<i>PM4 – Sports Provision</i>
<i>DM Policy 33 – Protection of open space</i>	<i>PM5 – Protection of Open Space, Sports Facilities and Local Green Space</i>
<i>DM Policy 34 – Community Facilities</i>	<i>PM6 – Community Facilities and Services</i>

Chapter 11 - Natural Environment

In total 155 comments were made on the Natural Environment chapter. A summary of the representations received and the council's response to these representations is set out below.

Representations on the Chapter

In total 28 general representations were made on this chapter by 25 consultees. Representations were received from:

Name	Organisation	Comment ID
Tracy Hawkes		DLP805
Ms Fiona Le Ny		DLP164
Nick Eede		DLP185
Mrs Sue Ward		DLP251, DLP3728
Ken Chapman	Sandwich Bay Bird Observatory Trust	DLP294
Dr Raju Sakaria		DLP622
Julie Davies	CPRE	DLP830, DLP833
Emily Sims		DLP886
Mrs Sacha Davies		DLP888
Laura Fidler	Sandwich Town Council	DLP946
Rosie Rechter		DLP951
Mrs Christine Oliver		DLP1092
Michael Davies		DLP1117
Bridget Fox	The Woodland Trust	DLP1133
Katie Razzell	Aylesham Parish Council	DLP1940
Chris Shaw		DLP1215
Gary Bradbury		DLP1267
Nathan Burns	Natural England	DLP1450, 1451
Lucinda Robinson	Marine Management Organisation	DLP1609
Alan Byrne	Historic England	DLP1667
Penelope James	Dover and Deal Lib Democrats	DLP1015
Derek Leach	The Dover Society	DLP3049
Stephen Mason		DLP3114

Sarah Gleave	Dover and Deal Green Party	DLP2843
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Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Extensions to AONB suggested along Crossroad and Ellens Road, Great Mongeham and Walmer and Kingsdown Golf Course	Not within the power of the Local Plan
Additional policies needed - protection of tranquil areas and protection of intrinsically dark landscapes in line with NPPF paragraph 180.	Government guidance states that Local Plans should not repeat the NPPF. In this instance Policy SP16 and the NPPF (paragraph 185 July 2021 version) provide protection for the tranquil areas and intrinsically dark landscapes of this district. Policy DM38 protects the tranquillity of the Kent Downs AONB.
The Goodwin Sands should be considered part of the District’s natural capital and be fully protected as such.	Goodwin Sands Marine Conservation Zone added to the inventory of the District’s natural capital at the beginning of this Chapter.
Should be a dedicated policy for the River Stour and Delf Stream, setting out similar future conservation and aspirations as DM Policy 43 does for "The River Dour".	Policy SP17 provides for the conservation and enhancement of ecological networks including blue corridors. The River Dour is considered to require a separate policy given the particular challenges and development pressures along its short length through the town of Dover and its rarity as a chalk stream.
Retention of existing hedgerows is important for biodiversity as well as carbon sequestration.	Importance of safeguarding hedgerows is included within SP17
Ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland.	Noted. Ancient woodland and ancient trees are protected by Policy SP16.
The importance of biosecurity measures being implemented should be highlighted within the plan to ensure developers are aware of the need to consider the risk of spread of Invasive Non-Native Species (INNS) especially through Port developments.	This is addressed in Policy DM9.

Add reference the Marine Policy Statement and the South East Marine Plan. The SE marine plan is due to be adopted in this year, so the plan will go from its current state of “material for consideration” to having the full weight of an adopted plan.	Reference the Marine Policy Statement and the South East Marine Plan added.
Providers of green and blue infrastructure should be encouraged to liaise with primary care networks (such as social prescribing link workers) and community groups to deliver public health and wellbeing benefits.	Health and well-being benefits of the natural environment added to the supporting text to SP17
Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.	Addressed in the Sustainability Appraisal of the Plan’s policies (SA Objective SA5)
The interrelationship between conservation of the historic environment and green infrastructure should be considered at the strategic policy level	Strategic Policy SP18 refers.
Plan should support the Kent Downs AONB project seeking UNESCO designation for the Kent Downs AONB.	Reference to the UNESCO Project added to the opening section of this Chapter.

Representations on the issues identified

In total 8 representations were made on this section by 7 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP38
Mrs Susan Sullivan		DLP2661
Dr Sharon Danby		DLP773
Andrew Ferguson		DLP854
Mike Eddy	Walmer Parish Council	DLP2031
Sara Gomes	Environment Agency	DLP1544, 1548
Shelley Morris		DLP3247

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
add to the last bullet point of key issues: Deliver efficiency and quality in water supply, which is obtained by groundwater abstraction throughout the District.	The fact that water supply in this district derives from groundwater is noted in the

	supporting text to DM Policy 42.
The Local Plan and supporting documents do not adequately address water quality issues. Although water quality is addressed to some degree within other parts of the local plan, there are no specific policies aimed directly at addressing human impacts on water quality.	Policy DM42 specifically addresses water quality and supply. It includes measures to mitigate against the impact of human activity.
Offsetting schemes should be a requirement when any greenfield site is developed to mitigate against habitat loss.	This issue is addressed in the supporting text to Policy DM38
Add aim to contribute to the 25 year Government plan to create or restore 500,000 hectares of wildlife rich habitat outside the protected site network by mapping and safeguarding appropriate sites in the Dover District	This work will be taken forward through a Local Nature Recovery Strategy which is currently proposed to be developed at county level.
Aid the recovery and prevent the extinction of, legally protected and threatened species of animals, plants and fungi, including through the planning process	Protected species are protected by Strategic Policy SP16
Restriction on development within the identified 9km zone of influence would be a more effective way of reducing visitor pressure on the Thanet Coast and Sandwich Bay SPA	Visitor pressure on the protected landscapes and habitats of this SPA has been examined as part of the revised Strategic Access Mitigation and Monitoring Strategy prepared alongside this Plan.
Plan should abide by the Kent Nature Partnership's decision as to whether this should be 10% or 20% Biodiversity Net Gain.	Please see response to representations on Policy DM38

Representations on the Options identified

In total 7 representations were made on this section by 7 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Susan Sullivan		DLP2667
Sonja Watsham	East Kent Climate Action	DLP2572
Dr Sharon Danby		DLP775
Nicky Britton-Williams	Kent Wildlife Trust	DLP1518

Sara Gomes	Environment Agency	DLP1533
Kevin Bown	Highways England	DLP1818
Dover Town Council		DLP1191

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
2 representations support the Options	Comments noted and welcomed.
Dover Strategic Access Mitigation and Monitoring Strategy (SAMM) and the levying of tariffs on development is inadequate as mitigation for the harmful effects caused by visitor pressure, on the Thanet Coast and Sandwich Bay SPA.	Visitor pressure on the protected landscapes and habitats of this SPA has been examined as part of the revised SAMM prepared alongside this Plan.
Biodiversity should be proactively promoted throughout the Local Plan so that it is within this context that development is brought forward and it won’t be enough to protect just designated sites. More ambitious aims are needed throughout this section to stop biodiversity and habitat loss.	The enhancement of biodiversity as a whole is promoted in Strategic Policy SP17 and Policy DM38 of this plan, alongside the protection of designated sites.
DDC should abide by the Kent Nature Partnerships decision as to whether this should be 10% or 20% Biodiversity Net Gain.	Please see response to representations on Policy DM38
Local Wildlife Sites should be added to the key issues to consider in section 11.3 and in Figure 11.1.	Local Wildlife Sites included in the inventory of designated sites and added to Figure 11.1
In line with the Councils duty under the NERC Act to conserve biodiversity, the Plan should ensure that there is no loss of priority habitats, with the biodiversity policies updated to reflect these requirements.	Priority habitats are protected by Strategic Policy SP16.
Native chalk and rough-grazed grasslands habitats are a vital part of the ecological network within Dover and should be incorporated within a strategic Local Nature Recovery Strategy.	Noted. The introduction of Local Nature Recovery Strategies is included in the Environment Act. These will establish priorities and map proposals for specific actions to drive nature’s recovery and provide wider environmental benefits. The area covered by each Local Nature Recovery

	Strategy will be set by the Defra Secretary of State, who will also appoint a “responsible authority” for each to lead its preparation. Boundaries will be established once the Environment Bill receives Royal Assent. The government anticipates approx. 50 LNRs across England so they will most likely be at a county level.
In paras 3.13 and 11.58 the statistic from the Kent Environmental Strategy dates from 2012-13. A more up to date figure is presented in the Water Cycle Study para 1.2.	Statistics updated.
11.22 High Meadow and most of Whinless Down LNRs are owned and managed by Dover Town Council not Dover District Council.	Text clarified.

Summary of Proposed Changes

- All issues raised are addressed in specific changes to the policies in this chapter

Strategic Policy 16: Protecting the District’s Hierarchy of Designated Environment Sites (Reg 19 Policy SP13)

In total 19 representations were made on this section by 19 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP39
Dr Sharon Danby		DLP789
David Sims		DLP1414
Nathan Burns	Natural England	DLP1435
Planning Department	Canterbury City Council	DLP1508

Mrs Joanna Thomson	Goodwin Sands Preservation Trust	DLP2179
Kelly Lawrence	Deal Town Council	DLP2156
Katy Wiseman	National Trust	DLP1607
Barbara Cooper	Kent County Council	DLP1758
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1910
Lee Evans Planning	(on behalf of) The Land Trust	DLP1950
James Leah	Royal Cinque Ports Golf Club	DLP2071
Peter Cutler	Friends of Betteshanger	DLP2082
Derek Leach	The Dover Society	DLP3050
Mrs Susan Sullivan		DLP2662
Sarah Gleave	Dover and Deal Green Party	DLP2844
Kim Horwood		DLP3473
Nicky Britton-Williams	Kent Wildlife Trust	DLP3657
Natsuko Akazawa		DLP2223

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
6 representations support the Policy.	Comments noted and welcomed.
A 500m buffer zone is excessively restrictive and limits the flexibility of any development plan, should be no more than the current 150m	The 500m zone reflects the HRA recommendations which concludes that, taking a precautionary approach, that the effects of noise, vibration and light pollution are capable of causing an adverse effect if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances. The SPA and Ramsar site support qualifying wetland bird

	species, which are susceptible to disturbance from noise, vibration and increased lighting.
Development where significant harm to locally identified biodiversity assets cannot be avoided, should not be permitted. The provision that where harm cannot be avoided on site "appropriate mitigation will be required" is unacceptable, as it the suggestions that a "financial contribution" in lieu of on-site mitigation may be considered in very exceptional circumstances.	This proposed amended wording would not be compliant with national planning policy and guidance.
Policy should be revised and should be encompassed in an overarching Biodiversity Policy to include designated and non-designated sites, irreplaceable habitats and priority habitats for example with clear reference to biodiversity net gain.	Policy SP16 will be amended to make a clearer distinction between the two Strategic Policies of this Chapter, with SP16 addressing the protection of and avoidance of harm to designated sites and protected habitats and species and SP17 focusing on the enhancement of green infrastructure and biodiversity throughout the district.
Strategic Policy 16 should be a GI Policy only with links to an overarching GI strategy.	Policy SP16 will be amended to make a clearer distinction between the two Strategic Policies of this Chapter, with SP16 addressing the protection of and avoidance of harm to designated sites and protected habitats and species and SP17 focusing on the enhancement of green infrastructure and biodiversity throughout the district.
The policy does not cite the requirement for a measurable net gain in biodiversity and is unclear in its use of the terms mitigation and compensation.	Net gain in biodiversity is addressed by Policy DM38.
Include requirement that relevant development will only be permitted where a project level HRA assessment has demonstrated in accordance with the Habitat Regulations, that any proposal will not adversely affect the integrity of the Stodmarsh SAC, SPA and Ramsar.	This is already required by Policy SP16.

<p>Include requirement for the calculation of a nutrient budget for each development proposed within or which discharges into the Little Stour and Wingham Catchment and where necessary the implementation of site-specific mitigation measures to demonstrate nutrient neutrality.</p> <p>Consideration of nutrient budgets should also be undertaken on a strategic scale taking into account allocations and likely windfall of this planning period.</p>	<p>With regard to the current NE advice on threats to the water quality of the Stodmarsh Lakes complex, the Council is currently taking expert hydrological advice to determine whether or not areas of Dover District should be included within this guidance. This section will be updated when this matter has been resolved.</p>
<p>The proposed policy wording provides a less robust protection than that required by the NPPF in paragraph 175. a) and b)</p>	<p>Wording of the two strategic Natural Environment policies SP16 and SP17 will be amended to more closely reflect the NPPF (2021 paragraph 179 a) and b))</p>
<p>Ancient woodland should be included in Strategic Policy 16 under a more general biodiversity policy in line with NPPF 175 c)</p>	<p>The protection of Ancient Woodland and ancient and veteran trees has been added to SP16.</p>
<p>Policy should include Nature Recovery Networks. These form a strong element of the Environment Bill and should be planned for at a strategic scale in partnership.</p>	<p>The introduction of Local Nature Recovery Strategies is included in the Environment Act. The government anticipates approx. 50 LNRS across England so they will most likely be at a county level. Reference has been added to policy SP17.</p>
<p>It is not clear how natural capital is to be considered through the Local Plan and we advise that this should be more clearly incorporated.</p>	<p>Reference to natural capital will be added to the supporting text of this Policy.</p>
<p>The terms mitigation and compensation are not accurately reflected. Compensation is a very last resort where opportunities for mitigation has been demonstrably exhausted.</p>	<p>Wording, including with regard to the mitigation hierarchy, of Policy SP16 will be amended.</p>
<p>Plan should emphasise the requirement for developments to adhere to the mitigation hierarchy and net gain must be delivered in addition to this.</p>	<p>Wording, including with regard to the mitigation hierarchy, of Policy SP16 will be amended and tightened.</p>
<p>Goodwin Sands Marine Conservation Zone was designated in May 2019 and has several nominated Protected Habitats and Protected Features. At 277</p>	<p>Goodwin Sands MCZ has been added.</p>

km2 it is by far the largest MCZ in the District and should be added to the policy.	
Local Wildlife Sites should be added to Figure 11.1	Local Wildlife Sites added.
It is appreciated that additional evidence is required to inform a specific Zone of Influence for the Dover to Kingsdown Cliffs SAC, but it can still be seen that within 4km of the site an estimated 6,010 new dwellings are being proposed through site allocations and therefore the associated visitor increases to the SAC may be significant.	Additional supporting text to this Policy inserted to address this issue.
Ham Fen Nature Reserve should be included in the Ramsar as it is the last valley fen in South East England.	Ham Fen falls within the Thanet Coast and Sandwich Bay Ramsar site. It is also an SSSI.
the entire grounds of Walmer and Kingsdown Gold Course and The Otto Bottom / Oldestairs Road Valley running between St Margaret's and Kingsdown to Oldestairs Bay should be are protected by AONB and Local Green Space because of its natural beauty and contain a diversity of wildlife habitats.	AONB designation is not within the gift of the Local Plan.

Summary of Proposed Changes

- Policy will be amended to show clearer distinction between this and SP17
- Local Wildlife Sites will be added
- Wording, including with regard to the mitigation hierarchy will be amended and tightened.
- Wording will be updated to reflect NPPF 2021

Strategic Policy 17: Enhancement of Green Infrastructure and Biodiversity (Reg 19 Policy SP14)

In total 22 representations were made on this section by 21 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Debbie Philpott		DLP65
Dr Sharon Danby		DLP794
Ms C Smith		DLP958, 1148
Nathan Burns	Natural England	DLP1436
Katie Miller	Kent Downs AONB Unit	DLP1495
Nicky Britton-Williams	Kent Wildlife Trust	DLP1520

Alan Johnson	RSPB	DLP1555
Katie Wiseman	National Trust	DLP1606
Barbara Cooper	Kent County Council	DLP1759
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1912
Mike Eddy	Walmer Parish Council	DLP2033
Peter Cutler	Friends of Betteshanger	DLP2083
Kelly Lawrence	Deal Town Council	DLP2157
Mrs Susan Sullivan		DLP2663
Sonja Watsham	East Kent Climate Action	DLP2573
Sarah Gleave	Dover and Deal Green Party	DLP2845
Sarah Gleave	Kent Tree and Pond Partnership	DLP2214
Derek Leach	The Dover Society	DLP3051
Mrs Susan Sullivan		DLP2663
Kim Horwood		DLP3475
Marnie Caton	Sandwich Environment Conservation Group	DLP3318

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
1 representation supported the Policy	Comments noted and welcomed.
Green corridors are vital and plans must include a link up of existing habitats through tree/hedgerow planting and wild flower sowing across all areas including verges and through towns and villages.	SP17 protects the integrity of existing network of green infrastructure and ecological habitats across the district.
Retention of hedgerows is important for biodiversity as well as carbon sequestration.	SP17 acknowledges the role of hedgerows within ecological networks.
Add requirement to retain all trees on the perimeter of large developments and pockets of existing trees within developments.	Not appropriate given the need to reflect individual site contexts.
Work to retain & enhance natural capital generally, mindful of the KCC commitment to establish the growth of 1.5 million new planted trees across the county.	KCC commitment acknowledged in supporting text to Policy DM9 which presents the tree planting policy approach of this Local Plan.

The Dover Local Plan does not give sufficient weight to the importance of pursuing net gains outside the Biodiversity Opportunity Areas.	Net gains are addressed in Policy DM38. Cross-reference to this policy will be added to the redrafted version of SP17.
Add requirements to take all steps possible to protect and aid the recovery of, protected, priority and threatened species, including not allocating land/granting planning permission for habitat that supports species in decline or vulnerable to extinction, particularly priority habitats.' and to map and identify significant wildlife rich sites and then allocate those with the least biodiversity interest for development.	Protection of priority habitats and species addressed by Strategic Policy SP16.
Policy is too passive with too many shoulds which ought to be musts.	Wording of this policy is in accordance with the approach adopted across the plan as a whole.
Any development resulting in the 'loss of deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees' should be refused without right of Appeal. Natural habitats, ancient trees and woodland are good for mental and emotional health and for the biodiversity and health of the planet.	The approach taken in the Plan is compliant with that set out in national planning policy on this issue. The well-being benefits of nature and access to it will be added to the supporting text to this policy.
Strengthen wording on the expectation of proposals to safeguard features of nature conservation interest and include measures to retain, conserve and enhance these habitats and features.	Wording of Strategic Policies SP16 and SP17 has been strengthened.
recommend dividing this policy separating the requirements for general biodiversity and for green infrastructure.	Policy will be redrafted to address green infrastructure in the first instance followed by biodiversity
Policy should be linked to a multifunctional Green Infrastructure Strategy for Dover.	Both Strategic Policies SP16 and SP17 require adherence with the Dover Green Infrastructure Strategy which is being prepared to accompany this Plan.
Amend "Proposals that conserve or enhance biodiversity will be supported" given that all proposals could conserve and enhance biodiversity to a certain extent to "Proposals <u>should</u> safeguard features of nature conservation interest"	Wording changed to "Proposals <u>must</u> safeguard features of nature conservation interest [..]"
Add chalk grassland as this is a particularly important habitat in the AONB and Heritage Coast.	Chalk grassland reference added.
Policy wording needs to be strengthened to ensure the design and management of GI on development sites is	Issue of responding to visitor pressure on the

also focused on attracting groups of visitors who regularly visit internationally designated sites, i.e., walkers and dog walkers. Suggest that additional wording is added to link to their mitigating role.	designated sites of the district is addressed in the HRA that accompanies this Plan and by Policy DM40 with regard to the Thanet Coast and Sandwich Bay SPA, SAC and Ramsar sites. Additional supporting text to SP16 added to address results of visitor surveys on the two remaining SACs of the District - Lydden and Temple Ewell Downs and Dover to Kingsdown Cliffs.
Multi-agency approach is needed to address some of the issues associated with increased recreational pressure at the Dover to Kingsdown Cliffs SAC, including improving the visitor experience, access management and visitor monitoring to protect and enhance the SAC and other important areas of habitat.	Noted. The Council is liaising with the major landowner the National Trust on this matter.
Add reference to the four Turtle Dove Friendly Zones (TDFZs) in Dover District.	This is addressed in the Green Infrastructure Strategy that accompanies this Plan.

Summary of Proposed Changes

- Policy will be redrafted to address green infrastructure in the first instance followed by biodiversity
- Policy will be updated to ensure distinction between this and SP16
- DDC will continue to liaise with National Trust of SAC issues and recreational pressure
- Wording changed to “Proposals must safeguard features of nature conservation interest [..]”
- Chalk Grassland reference will be added
- The well-being benefits of nature and access to it will be added to the supporting text to this policy.
- Cross references will be made to other policies such as BNG – DM38

DM Policy 38: Biodiversity Net Gain (Reg 19 Policy NE1)

In total 20 representations were made on this section by 20 consultees. Representations were received from:

Name	Organisation	Comment ID
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Nick Eede		DLP214
Mrs Elizabeth Hayes		DLP747
Dr Sharon Danby		DLP795
Ms C Smith		DLP1122
Nathan Burns	Natural England	DLP1445
Katie Miller	Kent Downs AONB Unit	DLP1496
Kelly Lawrence	Deal Town Council	DLP2159
Nicky Britton-Williams	Kent Wildlife Trust	DLP1519
Sara Gomes	Environment Agency	DLP1527
Barbara Cooper	Kent County Council	DLP1760
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1913
Mike Eddy	Walmer Parish Council	DLP2035
Peter Cutler	Friends of Betteshanger	DLP2084
Mrs Susan Sullivan		DLP2664
Sonja Watsham	East Kent Climate Action	DLP2574
Sarah Gleave	Dover and Deal Green Party	DLP2846
Derek Leach	The Dover Society	DLP3053
William Hickson		DLP3573
David Spence-Reid		DLP3140
David Reid		DLP3511

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
5 representations support the Policy	Comments noted and welcomed.
Policy should reflect the County wide ambition for 20% biodiversity net gain.	Plan Viability work concluded that, whilst seeking 20% Biodiversity Net Gain is unlikely to have a material impact on viability on those sites on which it can be delivered on-site without reducing the site’s development

	<p>capacity, there is no evidence that all sites that will come forward over the Plan period will be able to provide for on-site delivery above the national requirement without reducing development capacity. The Policy therefore requires a minimum of 10% BNG.</p>
<p>Policy should emphasise the requirement for developments to adhere to the mitigation hierarchy and net gain must be delivered in addition to this.</p>	<p>References to the mitigation hierarchy have been clarified in the Policy, with an emphasis that compensation will be considered as a last resort.</p>
<p>The term offsetting has been used variously in this section. We advise that Net Gain should be incentivised for on-site delivery first; then locally offsite, in line with Local Plan priorities/ GI strategy.</p>	<p>Wording clarified.</p>
<p>Partnership working should happen with neighbouring LPA, wildlife trusts and Local Nature Partnerships as this will be key to establish strategic schemes.</p> <p>Policy should also consider habitat creation being carried out outside the district when it is appropriate e.g. habitat creation works in neighbouring districts to improve habitat connectivity into the district or strategically important Kent works.</p>	<p>Noted. Local Nature Recovery Strategies are likely to be created at county level and therefore biodiversity will be delivered through partnership working.</p>
<p>Policy should include reference to the production of an SPD to provide details of how net gain will be effectively delivered in practice with links to GI and Nature Recovery Networks.</p> <p>Policy should provide details on how this percentage should be measured, using the most up to date version of the Defra Biodiversity Metric, specify how developers should present their calculations and details of how on and offsite compensation and net gain will be delivered, require that on and offsite net gain should be delivered at location that meets strategic landscape scale priorities, including specific reference to future Local Nature Recovery Strategies, specify that BNG provision should follow the mitigation hierarchy.</p> <p>Dover District Council's Local Requirements for Biodiversity and Geodiversity are out of date. Should be updated and used as intended.</p>	<p>Policy DM38 and supporting text will be amended to reflect enactment of the Environment Act, update references to the Biodiversity Metrics, add a commitment to the production of a Biodiversity Net Gain SPD to provide guidance on the use of the Defra Biodiversity Metric and Small Sites Metric, how percentages should be measured, calculations should be presented, how on and offsite compensation and net gain will be delivered.</p>

Amend to acknowledge that Defra's Biodiversity Metric has been updated to 3.0.	Amended.
Replace figure of 30 years with 50 years.	30 years accords with the wording of the Environment Act.
Biodiversity offsetting and biodiversity net gain should be rejected for planning proposals unless it can be clearly demonstrated that the mitigation hierarchy has been strictly followed, all other options have been considered and found to be unfeasible and impacts are considered acceptable	References to the mitigation hierarchy will be clarified in the Policy with an emphasis that compensation will be considered as a last resort.

Summary of Proposed Changes

- BNG % requirement will be reviewed and addressed through viability work
- The policy will be updated to reflect the bringing into law of the Environment Act and DEFRA metrics
- Will add commitment to produce supporting SPD
- Mitigation Hierarchy and offsetting will be clarified

DM Policy 39: Landscape Character (Reg 19 Policy NE2 – Landscape Character and the Kent Downs AONB)

In total 14 representations were made on this section by 14 consultees. Representations were received from:

Name	Organisation	Comment ID
Martin Brandon		DLP361
David Stewart		DLP626
Mrs Elizabeth Hayes		DLP748
Nathan Burns	Natural England	DLP1446
Katie Miller	Kent Downs AONB Unit	DLP1497
Chris Telford	The Coal Authority	DLP1732
Barbara Cooper	Kent County Council	DLP1761
Jane Cook	St Margarets-at-Cliffe Parish Council	DLP1909
The Land Trust	Lee Evans Planning	DLP1951
Kelly Lawrence	Deal Town Council	DLP2160

Sarah Gleave	Dover and Deal Green Party	DLP2847
Derek Leach	The Dover Society	DLP3054
Alan Byrne	Historic England	DLP3656
Kim Horwood		DLP3474
Ken Chapman	Sandwich Bay Observatory Trust	DLP294
Graham Hutchinson	White Cliffs Tourism Association	DLP3737

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
3 representations support the Policy	Comments noted and welcomed.
Need to look for ways to ‘re-wild’ areas such as former wetlands and to extend tree cover by the planting of appropriate native species, both in rural and urban areas	Tree planting and protection address by Policy DM9 of this Plan.
Further developments of freshwater wetlands, in the area stretching from the Lydden Valley in the south, across Worth Minnis and including the RSPB Reserve, the Sandwich Bay marshes and inland via Gazen Salts, Monks Wall and into the Lower Stour Marshes and the Ash Levels, should be encouraged.	Habitat development and expansion will come forward through Local Nature Recovery Strategies and the Dover Green Infrastructure.
Policy should be reworded to reflect the great weight that is afforded to AONBs through the NPPF. The special qualities of the AONB must be clearly included in this policy.	Policy will be amended.
The Dover Folkestone and the South Foreland Heritage Coasts should be included as for the Kent Downs AONB.	Reference to the Heritage Coasts, both of which lie within the Kent Downs AONB, will be added
Policy should reflect that many heritage assets draw much of their character and significance from the local materials they comprise and landscape context in which they sit, particularly within areas of exceptional landscape value	This Policy includes reference to the historic landscape, which is acknowledged as an important characteristic, to which particular regard should be paid.
Policy should include reference to rural PROW network and recognised national and local trails.	The role of footpaths in shaping landscape character is referenced in the Policy.
First sentence of paragraph 11.44 is incorrect. AONBs are designated to conserve and enhance their natural beauty (The National Parks and Access to the Countryside Act 1949). Whilst this includes scenic	The definitions of natural beauty and the setting of AONBs have been corrected to bring them

<p>quality and biodiversity it is not restricted to those aspects. “Natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries”</p>	<p>into line with the wording of the Countryside and Rights of Way Act.</p>
<p>Paragraph 11.45 implies that protecting AONB setting is only about visual impact. Section 85 of the CROW Act places a statutory duty on all relevant authorities requiring them to have regard to the purpose of AONBs when coming to decisions or carrying out their activities relating to or affecting land within these areas. Development outside an AONB can affect it through visual impact but also through other impacts such as on tranquillity, dark skies and habitat networks.</p>	<p>The definition of natural beauty and the setting of AONBs will be corrected to bring them into line with the wording of the Countryside and Rights of Way Act.</p>
<p>References to Landscape Character Assessments should include the recently updated Kent Downs AONB Landscape Character Assessment Review which includes the White Cliffs Coast and the East Kent Downs Local Character Areas in the District of Dover.</p>	<p>Reference to the Kent Downs AONB Landscape Character Assessments will be updated.</p>
<p>Protections for the landscape against inappropriate development are inadequate.</p>	<p>Policy DM39, alongside the other policies of this Chapter, are considered to provide significant protection for landscape character in line with national policy and guidance.</p>
<p>Policy should protect sites which do not have national designations such as Special Landscape Areas.</p>	<p>Dover District does not contain any Special Landscape Areas. Historically these were a designation in the Kent Structure Plan but following the phasing out of structure plans they have been replaced with other designations.</p>
<p>Replace “should” with “must”</p>	<p>The use of should and must in this Policy is in accordance with the approach taken across the Plan wording as a whole.</p>
<p>AONB designation should not prevent proposals for tourism and hospitality being supported.</p>	<p>Proposals for tourism and hospitality development in the AONB will be assessed against this Policy and against tourism policy.</p>

Summary of Proposed Changes

- More detail will be added on weight of AONB and legislative background
- References will be added relating to Heritage Coast
- Guidance document refs will be added such as AONB landscape Character Assessments and Management Plans

DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy (Reg 19 Policy NE3 - Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy)

In total 5 representations were made on this section by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Nathan Burns	Natural England	DLP1447
Barbara Cooper	Kent County Council	DLP1763
Kelly Lawrence	Deal Town Council	DLP2161
Sarah Gleave	Dover and Deal Green Party	DLP2848
Derek Leach	The Dover Society	DLP3055

Summary of Representations – Main Issues	Council's Response – Proposed Changes
3 representations support the Policy	Comments noted and welcomed.
<p>It is not clear why the suggested policy requires residential developments greater than 10 dwellings outside of the established ZOI to make a financial contribution to provide monitoring measures.</p> <p>From the evidence provided a 9km Zone of Influence has been identified within which the SAMM contribution is to be made. Developments such as larger developments (beyond 9km up until the distance the evidence suggests) which may also increase visitor pressure on the SPA should be considered on a case by case basis through a project level HRA. This approach would allow for the larger developments referred to in the supporting text which lie outside the ZOI to be assessed through a project level HRA and to provide SAMM as necessary.</p>	<p>The SAMM has been updated for the Reg 19 Plan. Only residential development within a 9km Zone of Influence will be required to make financial contribution towards mitigation and monitoring measures.</p> <p>Developments beyond the 9km Zone of Influence which may also increase visitor pressure on the SPA will be assessed on a case by case basis through a project level</p>

	HRA and may be required to make contributions.
The finalised strategy must be considered at the appropriate assessment stage of HRA before a determination on the Adverse effect on integrity of the Dover plan can be made.	This is the approach already being taken to meet the statutory obligations of the plan preparation process.

Summary of Proposed Changes

- Policy will be updated to reflect the revised SPA Mitigation and Monitoring Strategy and tariff.

DM Policy 41: Air Quality (Reg 19 Policy NE4)

In total 8 representations were made on this section by 8 consultees. Representations were received from:

Name	Organisation	Comment ID
Mrs Elizabeth Hayes		DLP749
Dr Sharon Danby		DLP797
Barbara Cooper	Kent County Council	DLP1764
Kevin Bown	Highways England	DLP1795
Cllr Peter Walker	DDC Ward Aylesham, Eythorne and Shepherdswell	DLP2048
Kelly Lawrence	Deal Town Council	DLP2162
Sarah Gleave	Dover and Deal Green Party	DLP2849
Derek Leach	The Dover Society	DLP3056

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
3 representations support the Policy	Comments noted and welcomed.
Policy should be strengthened to ensure that a modal shift can be achieved.	Policy wording will be strengthened to reference the need to demonstrate

	that a modal shift can be achieved.
The proposed Inland Border Facility is going to greatly increase the time lorries spend within the Dover/Whitfield area, having a negative impact on air quality from increased vehicle emissions. How will these impacts on air quality be mitigated? The site needs to be relocated to a location on the road network away from the residential areas of Dover/Whitfield.	An IBF is no longer proposed. In any event, the location of such a Facility is a national government decision, and therefore beyond the remit of the Local Plan.
Until there has been significant investment in cycle routes and footpaths to improve connectivity for villagers, large scale developments should not be permitted in rural locations.	Such an approach would not be in accordance with national planning policy or guidance.
Townwall Street area should be replanted with London Plane trees which are the ideal tree to improve air quality. Trees in this area towards the Eastern Docks would also give a more attractive welcoming visual appearance encouraging tourism.	A Tree Planting Strategy will be prepared as part of the Green Infrastructure. Tree planting policy is set out in Policy DM9.
“should” needs to be stronger with “must”.	Wording of policy is in accordance with the approach taken across the Plan.

Summary of Proposed Changes

- Policy wording will be strengthened to reference the need to demonstrate that a modal shift can be achieved.

DM Policy 42: Water Supply and Quality (Reg 19 Policy NE5)

In total 12 representations were made on this section by 11 consultees. Representations were received from:

Name	Organisation	Comment ID
Trevor Johns		DLP475
Dr Sharon Danby		DLP798
Mrs C Smith		DLP1150
Seb Willetts	Langdon Parish Council	DLP1263
Kelly Lawrence	Deal Town Council	DLP2163
Nathan Burns	Natural England	DLP1448
Sara Gomes	Environment Agency	DLP1536, 1546

Cllr Peter Walker	DDC Ward Aylseham, Eythorne and Shepherdsweil	DLP2046
Sarah Gleave	Dover and Deal Green Party	DLP2850
Derek Leach	The Dover Society	DLP3057
Stephen Mason		DLP3113

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
3 representations support the Policy	Comments noted and welcomed.
<p>Recommend including a requirement, as recommended by your HRA report, that relevant development will only be permitted where a project level HRA assessment has demonstrated in accordance with the Habitat Regulations, that any proposal will not adversely affect the integrity of the Stodmarsh SAC, SPA and Ramsar.</p> <p>It is not entirely correct to state that catchments within Dover District are either upstream or downstream of the Stodmarsh lakes. The catchments that lie within Dover District drain into the Wingham / Little Stour, which join the Stour along the tidal reach, which is therefore downstream of Stodmarsh lakes on the ebb tide and upstream of Stodmarsh lakes on the flood tide.</p> <p>Add requirement for the calculation of a nutrient budget for each development proposed within or which discharges into the Little Stour and Wingham Catchment and where necessary the implementation of site-specific mitigation measures to demonstrate nutrient neutrality.</p> <p>Consideration of nutrient budgets should be undertaken on a strategic Plan level scale taking into account allocations and likely windfall of this planning period.</p>	<p>Many of the representations received relate to the current NE advice on threats to the water quality of the Stodmarsh Lakes complex. The Council is currently taking expert hydrological advice to determine whether or not areas of Dover District should be included within this guidance. This section will be updated when this matter has been resolved.</p>
Natural England's July advice on Nutrient Neutrality for New Development in the Stour Catchment in Relation to Stodmarsh Designated Sites was updated in November 2020.	Reference corrected.
Dover District is one of the most water scarce areas in the UK and as set out in the water for sustainable growth study of 2017, higher standards should be introduced than current building regulations to mitigate	Average water consumption figures have been updated to those in

<p>this. Grey water recycling and rainwater harvesting systems should be standard on all new homes and start training people for retrofitting existing housing stock to meet future homes standards.</p>	<p>the Water Cycle Study 2022.</p>
<p>Add the following sentence: “In addition, proposals for development within the Groundwater Source Protection Zones will only be permitted if there is no risk of contamination to groundwater sources. If a risk is identified, development will only be permitted if adequate mitigation measures can be implemented.”</p>	<p>The Policy will be amended to address groundwater protection and to include these sentences.</p>
<p>Drinking water Safeguard Zones should be included.</p>	<p>Groundwater Source Protection Zones protection wording will be strengthened.</p>
<p>Second paragraph amend “Major proposals for new development must be able to demonstrate that there are, or will be, adequate water supply and wastewater treatment facilities <u>via main sewer</u> in place to serve [..]”</p>	<p>The policy will be amended to add reference to requirement to demonstrate a connection to mains sewerage system</p>
<p>Point b of DM Policy 42, potentially controversial. Recommend limiting this sentence to the first part: b. Proposals for development which may include activities which would pose a high risk of contamination.</p>	<p>Wording will be amended.</p>
<p>Amend: “New graveyards <u>or cemeteries</u> will not be permitted in Zone 1. Farm waste, storage areas, new foul or combined sewerage <u>systems discharging to the ground</u> will not be permitted in Zone 1 unless adequate safeguards are provided.”</p>	<p>Wording will be amended.</p>
<p>Too much greenfield development / concrete will speed up runoff during wetter winters and lead to soil erosion.</p>	<p>Noted. Policy DM7 applies.</p>
<p>to protect our production of food from suffering drought in more extreme summers, it is essential that rainwater and grey water harvesting be a prerequisite on new homes, and shade from existing retained trees be ensured.</p>	<p>The need for new development to include sustainable design and construction methods is found in Policy DM2.</p>
<p>Change should be made to “must”.</p>	<p>Policy wording includes must in line with approach taken across the Plan.</p>

Summary of Proposed Changes

- The policy will be amended to add reference to requirement to demonstrate a connection to the mains sewerage system
- The policy will be amended to address groundwater protection and other wording changes requested by the Environment Agency.

DM Policy 43: The River Dour (Reg 19 Policy NE6)

In total 11 representations were made on this section by 11 consultees.
Representations were received from:

Name	Organisation	Comment ID
Nick Eede		DLP215
Mrs Elizabeth Hayes		DLP750
Mrs Sue Bradford		DLP1309
Kelly Lawrence	Deal Town Council	DLP2165
Nathan Burns	Natural England	DLP1449
Sara Gomes	Environment Agency	DLP1528
Barbara Cooper	Kent County Council	DLP1765
Andrew Howard-Grigg	Temple Ewell Parish Council	DLP2938
Sarah Gleave	Dover and Deal Green Party	DLP2851
Iona Dubieniec		DLP2514
Derek Leach	The Dover Society	DLP3058

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
5 representations support the Policy	Comments noted and welcomed.
The bylaw margin (8m measured from the top of the bank) of the River Dour should be kept free from any development and ecosystems enhanced whenever possible.	Bylaws are covered by different legislation. Wording will be amended to specifically require enhancement of the habitats and species of the River Dour in the Policy.
Any proposed development near River Dour need to consider how it will affect water biodiversity and wetland environment.	The Policy wording will be amended to reference the importance of protecting and enhancing the ecosystem of the river.
Paragraphs 170 and 175 of the National Planning Policy Framework (NPPF) recognise that the planning system should conserve and enhance the environment	Noted. These paragraphs of the NPPF are carried forward

by minimising impacts on and providing net gains for biodiversity. If significant harm resulting from a development cannot be avoided, adequately mitigated, or as a last resort compensated for, any planning permission should be refused.	by Policies SP17 and DM38 of this Plan.
Article 10 of the Habitats Directive states that wildlife corridor networks should be protected from development, and, where possible, strengthened by or integrated within it.	Wording will be strengthened. Wildlife corridor networks protected by Policy SP17.
Developments involving culverting should be avoided and refused because it can damage habitats and interrupt wildlife corridors.	Wording will be added to Policy to specify that developments involving culverting will not be permitted.
Proposals may not have an impact on water quality, river flow or riparian habitats, but they may still not be appropriate on other grounds – such as heritage conservation or highways matters for example.	Noted. The Local Plan should be read as a whole.
Recommend the following amendment: “Development proposals that affect the setting of the River Dour <u>must</u> , wherever possible, actively enhance the natural functioning of the river, provide adequate natural buffers to protect against polluting runoff, ensure that they create a connected active river frontage, improve public access and enhance wildlife interest”.	Wording strengthened. Policy remains a should rather than must however, given the need to acknowledge varied contexts of sites within the setting of the River Dour. This is in accordance with the approach taken to wording across the plan as a whole.
Recommend that reference is made to species and the need for surveys to assess the impacts on species within this policy.	Wording will be strengthened to require the enhancement of both habitats and species.
Plan should mention that the Dour is an extremely rare chalk stream providing a unique global habitat of international importance.	The supporting text will be amended to reference the fact that the River Dour is a very rare chalk stream and to provide additional details of its setting and biodiversity.
Any opportunity to enhance the natural habitat of the riverbanks should be taken up, and any chance to reverse the manmade sections of the river should be encouraged. Litter bins should be made more available along the river. The walking route along the river should be revamped and promoted. Support a dedicated cycle and pedestrian lanes being installed along Lower Road which runs next to the River Dour for its entire length.	Promotion of an attractive green spinal walking and cycling route along the riverside will be added to the supporting text to the Policy. Policy requires developments that adjoin the river to improve public access.

<p>Possibly scope along Barton Path where it widens in places could be enhanced magnificently by making it a focal point for families with attractive paving, appropriate lighting, benches and enhancing the garden walls of the properties alongside the path.</p> <p>Should be a stated policy of cleaning up disused sites along the Dour corridor to enhance the natural beauty of the Dour.</p>	
<p>Water filtration systems need to be put in so that silt and road run off which is toxic is prevented (at least partially) from going into streams.</p>	<p>Noted. The provision of natural methods of protection against polluting run-off included within the Policy.</p>
<p>The River Dour should be invested in, re naturalised and made more of an asset. Most towns would be extremely excited to have a rare habitat right through the middle.</p>	<p>Comments noted.</p>
<p>Create soft edges wherever possible.</p>	<p>Wording will be added to Policy to specify that developments involving culverting will not be permitted.</p>

Summary of Proposed Changes

- Wording will be amended to specifically require enhancement of the habitats and species of the River Dour
- Wording will be added to Policy to specify that developments involving culverting will not be permitted.
- Promotion of an attractive green spinal walking and cycling route along the riverside will be added
- The supporting text will be amended to reference the fact that the River Dour is a very rare chalk stream and to provide additional details of its setting and biodiversity

Natural Environment – Regulation 19 Changes to Policy Names and References

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 16 – Protecting the Districts hierarchy of designated environmental sites</i>	<i>SP13 - Protecting the Districts hierarchy of designated environmental sites and Biodiversity Assets</i>

<i>SP 17 – Enhancing Green Infrastructure and Biodiversity</i>	<i>SP14 - Enhancing Green Infrastructure and Biodiversity</i>
<i>DM Policy 38 – Biodiversity Net Gain</i>	<i>NE 1 - Biodiversity Net Gain</i>
<i>DM Policy 39 – Landscape Character and the AONB</i>	<i>NE2 - Landscape Character and the Kent Downs AONB</i>
<i>DM Policy 40 - Thanet Coast and Sandwich Bay SPA and RAMSAR mitigation strategy</i>	<i>NE3 - Thanet Coast and Sandwich Bay SPA mitigation and monitoring strategy</i>
<i>DM Policy 41 – Air Quality</i>	<i>NE4 - Air Quality</i>
<i>DM Policy 42 – Water Supply and Quality</i>	<i>NE5 - Water Supply and Quality</i>
<i>DM Policy 43 – The River Dour</i>	<i>NE6 - The River Dour</i>

Chapter 12 - Historic Environment

Representations on the Chapter

In total 19 representations were made on this chapter by 19 consultees.

Representations were received from:

Name	Organisation	Comment ID
Sue Ward		DLP252
Paul Damon		DLP287
Rev. Seth Cooper		DLP342
Shelley Morris		DLP3252
Derek Leach	Dover Society	DLP3059
Robin Green		DLP586
Kelly Lawrence	Deal Town Council	DLP3658
Julie Davies	CPRE	DLP832
Sarah Gleave	Dover and Deal Green Party	DLP2852
Sacha Davies		DLP885
Katie Razzell	Aylesham Parish Council	DLP1921
Rosie Retchter		DLP952
Caroline Loder-Symonds		DLP979
Graham Clemas		DLP2403
Ben Young	The Land Trust	DLP1952
Barbara Cooper	Kent County Council	DLP1766
Penelope James	Dover and Deal Liberal Democrats	DLP1023
Alan Byrne	Historic England	DLP3738
Graham Hutchinson	White Cliffs Tourism Association	DLP3693

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Historic England do not consider stand-alone policies in themselves to be sufficient. The policies and proposals throughout all sections of the plan should be tested against the potential effects they will have on the historic environment and the significance of heritage assets, using the evidence base. This, also, will be a key test of the soundness of the plan and the	Comments noted and are largely addressed within the Plan and through the policies.

achievement of sustainable development as defined in the NPPF when it is subject to examination.	
Support is given for the inclusion of a chapter dedicated to the Historic Environment, as the districts heritage is of exceptional quality and has a very important part to play in the future of the district.	Comments noted and welcomed.
The Deal Society welcomes the recognition of the Conservation Area Appraisal process in the draft Plan.	Comments noted and welcomed.
Support is given for the creation of a List of Local Heritage Assets and the proposal for the development of a methodology to enable local communities to create such lists, as there are none in the District currently.	Comments noted.
There is a concern that the dependence on local communities to prepare local listings demonstrates a lack of priority within the Local Plan to the intrinsic value of the historic built environment.	Comments noted. Local Lists are a formal process developed by Historic England for community interest groups to identify heritage that is valued by local communities.
There is a general recognition that appropriate action is required to prevent further deterioration of heritage assets that are on the Heritage at Risk Register held by Historic England and should be delivered as high priority.	Text will be included in the plan demonstrating the importance of Heritage at Risk.
Concern was raised over the expansion at Whitfield expansion in respect of the impact on the setting of historic buildings on Singledge Lane, which currently in rural setting would as a result of development be encompassed by a large housing estate.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The Sandwich Heritage Harbour Group generally support the objectives and policies within the local plan and have requested that it both recognises and incorporates the groups proposals, which include the reinstatement of the boatyard on Jesus Quay, Strand Street, creation of a Sandwich Maritime Museum, and the reinstatement of the quay along Riverside Green and provision of additional mooring space.	The points raised by the Sandwich Heritage Harbour Group and that regarding ecclesiastical buildings are noted but are not an issue the local plan can or needs to address.

Reference to historic ecclesiastical buildings in the local plan is limited to rural locations, and those in urban locations are also of immense significance.	Comments noted and welcomed.
Dover Society support the need to protect heritage assets from impact of any carbon neutral plans.	Comments noted and welcomed.
The Deal Society notes a correction to paragraph 12.20. The conservation areas in Deal and Walmer with an Article 4 Direction are: Middle Street, Deal; Nelson Street and South Barracks, Walmer. Recommendations for further Article 4 Directions on the Deal, Victoria and Wellington Road and Upper Deal Conservation Areas are still awaiting further public consultation.	Comments noted and correction will be made.
Deal Town Council support the chapter generally and recommend a policy relating to the Lydden Valley/ Wantsum Channel.	Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan.
Focus should not be on the degree of harm to the heritage asset's significance through the Heritage Statement, but the curtilage of the building and its setting should also be taken into account. Poor development has encroached upon the setting of historic buildings.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Heritage assets should present a challenge to the developer, since architecture which qualifies for this term is rare and specialised.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The CPRE note that traffic congestion can cause vibration which can harm the fabric of a listed building and is a matter that should be taken into consideration when developments are proposed close to a heritage asset.	Comment is noted but it is not a specific issue that the local plan can or needs to address.
Paragraph 12.10 refers to interpretation but there is no policy requirement for developments to provide information or interpretation of a site or area.	Comment is noted but it is not a specific issue that the local plan can or needs to address.

The chapter does not make specific reference to the Snowdon Colliery, where it is considered that development should be sensitive to the historic and communal value of the former coal mine buildings.	Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan. Consideration is being given to the need for a site specific policy.
The Parish Council feels that in order to maintain the coal-mining heritage of the local area, the colliery must be included in a long term plan.	Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan. Consideration is being given to the need for a site specific policy.
There is no specific reference to Fort Burgoyne and the proposals to regenerate the site as part of the Connaught Barracks development, as was in Core Strategy Policy CP10. Further thought needs to be given as to how the Council can support the objectives of The Land Trust to bring Fort Burgoyne back into active use to ensure it has a viable and sustainable long term future and that this should start by confirming the allocation of the site.	A relevant policy will be included within the plan.
Existing and potential archaeological sites must be strictly protected against ruthless developers and stringent policies put in place to ensure they are not destroyed.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
A significant part of our visitor offer relates to historic and heritage sites. There should be a policy which requires the Council to ensure English Heritage deliver on their plans for Dover Castle and to work closely with them to ensure plans are achieved.	Issues related to working with third parties including English Heritage are covered by Strategic Policy 18.
There is no specific reference to Mote's Bulwark and its reuse as a tourism attraction could be a missed opportunity. It warrants inclusion in local planning.	Specific reference to individual sites/buildings of historic interest is not necessary as they are

	covered by the proposed policies within the plan.
The Council does not fully exploit or support heritage assets elsewhere in the district such as Richborough Castle.	Issues related to working with third parties including English Heritage are covered by Strategic Policy 18. Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan.
The local plan should include a policy to achieve UNESCO World Heritage Status for our White Cliffs Country district.	Comment noted but it is not a specific issue that the local plan can or needs to address.

Representations on the issues identified

In total 2 representations were made on this section by 1 consultee. Representation was received from:

Name	Organisation	Comment ID
Alan Byrne	Historic England	DLP1668, 1673

The respondent stated that they agreed with the issues.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
The draft policies for the historic environment were welcomed.	Comment noted and welcomed.
The emphasis on the Western Heights as a key objective for the historic environment and inward investment is welcomed, and there is potential for parts of the site owned by DDC (e.g. the Grand Shaft Barracks) and in the English Heritage holdings to open up access to the wider site, such as via the north entrance.	Comment noted and welcomed.
There should be a policy for a district-wide positive strategy for Heritage-At-Risk to ensure proactive actions for dealing Heritage-At-Risk cases.	Text will be included in the plan demonstrating

	the importance of Heritage at Risk.
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Representations on the options identified

In total 4 representations were made on this section by 4 consultees.

Representations were received from:

Name	Organisation	Comment ID
Kelly Lawrence	Deal Town Council	DLP2173
Mike Eddy	Walmer Parish Council	DLP2037
Barbara Cooper	Kent County Council	DLP1767
Christine Haggart	Ash Parish Council	DLP1231

3 respondents stated that they agreed with the options and no respondents stated that they objected to the options identified.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Support the emphasis on appraisals and the requirement for improved quality of Heritage Statements as currently those submitted vary and often poor.	Comment noted and welcomed.
Would welcome stronger emphasis on the creation of a Local List of Heritage Assets which the Council has an obligation to create.	Comments noted and are largely addressed within the Plan.
The potential for local interest groups to prepare a Local Heritage List is welcomed, but the groups may not have the expertise. In addition to the stated guidance, practical assistance will be necessary.	Comments noted and are largely addressed within the Plan.
Welcome the recognition within the local plan of the relationship between the built heritage conservation, climate change and energy efficiency.	Comment noted and welcomed.
A specific policy dealing with any developments within the Lydden Valley/former Wantsum Channel is necessary due to its potential contribution to the understanding of the creation of the English Channel.	Archaeological sites, both designated and undesignated, are covered by the policies within the plan, in particular policy DM44 and 46.

The specific policy for Dover Western Heights is welcomed.	Comment noted and welcomed.
KCC support the specific policy for the Archaeology of Dover Town and note the commitment to develop an SPD for this. The adoption of the SPD should meet the needs of the town centre's archaeological resource.	Comment noted and welcomed.
There is only one statutorily protected wreck at Dover but there are many other shipwreck sites that would have been covered by a Maritime Heritage policy, had one been developed.	A policy is not necessary as this form of heritage protection is outside the statutory remit of the local planning authority, however a note has been added to the relevant topic paper.

Summary of proposed changes to chapter:

- Text will be included in the plan demonstrating the importance of Heritage at Risk.
- Corrections will be made relating to Conservation Areas and Article 4 directions

Strategic Policy 18: Protecting the District's Historic Environment (Reg 19 Policy SP15)

In total 12 representations were made on this policy by 12 consultees.

Representations were received from:

Name	Organisation	Comment ID
Derek Leach	Dover Society	DLP3060
Jamie Pout		DLP533
Joanna Thomson	Goodwin Sands Conservation Trust	DLP2183
Kelly Lawrence	Deal Town Council	DLP2166
Julie Davies	CPRE	DLP3736
Sarah Gleave	Dover and Deal Green Party	DLP2853
Katie Razzell	Aylesham Parish Council	DLP3732
Alan Byrne	Historic England	DLP1669
Mike Eddy	Walmer Parish Council	DLP2038

Barbara Cooper	Kent County Council	DLP1768
Patrick Murfet	Bee Equipment Ltd	DLP1182
Jason Ransley	Dover Harbour Board	DLP1239

6 respondents stated that they agreed with the policy and no respondents stated that they objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
KCC welcomes the description of the role of the Dover Heritage Strategy but recommend it be noted earlier within the Local plan as almost all the elements within the Local Plan interact with the historic environment in one way or another. As the Historic Environment chapter is at the end of the plan, earlier mentioning of the Heritage Strategy could potentially reassure readers that the historic environment is being appropriately considered before they reach this point.	The format of the Local Plan will be amended so that the Strategic Policies will be included at the beginning of the document.
KCC welcomes the commitment to developing a Local List and, as per the recommendation in the Heritage Strategy, encourages that the list includes the full range of heritage assets within the district.	Supporting text to the policy will be updated to include the range of heritage assets that a Local Heritage List can include.
The policy only refers to ‘heritage assets’ and does not cover the setting of heritage assets. The NPPF Glossary defines significance as ‘Significance (for heritage policy) derives not only from a heritage asset’s physical presence, but also from its setting.’ Development within the setting of a heritage asset can adversely affect the asset and the preamble and policy should be clear that the plan also seeks to protect the setting of heritage assets.	The policies enable changes to heritage assets to be assessed on their own merits within Listed Building Consent or planning applications as appropriate following full assessment of the significance of the heritage asset and the impact of the proposed works on the significance, supported by submitted information including Heritage Statements.
There is no specific mention of the former colliery site in Snowdown, which is considered to be of great significance to the local coal mining industry and the local community in Aylesham and Snowdown. The	Specific reference to individual sites/buildings of historic interest is not necessary as they are

grade II listed buildings should be maintained as well as making good use of the open spaces.	covered by the proposed policies within the plan.
A comment was received noting that the Goodwin Sands has been described as an 'extraordinary' archaeological resource and work is ongoing to create an interactive map which will contain information on aircraft crash sites, protected features and habitats.	Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan.
Paragraph 12.10 refers to 'historic' parks and gardens; the correct term is 'Registered' for statutory protected park and gardens.	An amendment has been made to paragraph 12.10 to correct the terminology.
KCC state that there are 7 Registered Parks and Gardens on the National Heritage List for England (NHLE).	The NHLE has been checked and records 6 Registered Parks and Gardens.
Development of a Register of Heritage Assets at Risk would complement the Local List and allow assets at most risk to be highlighted and to potentially receive more focused attention.	Comment noted and will be addressed within the Plan.

Summary of Proposed Changes

- The format of the Local Plan will be amended so that the Strategic Policies will be included at the beginning of the document and it will be made clearer that heritage is a key theme of the LP as a whole
- Development of a Register of Heritage Assets at Risk will be referenced

DM Policy 44: Designated and Non-designated Heritage Assets (Reg 19 Policy HE1)

In total 15 representations were made on this policy by 15 consultees.

Representations were received from:

Name	Organisation	Comment ID
Stephen Waring		DLP218
Derek Leach	Dover Society	DLP3061
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1914
Bethan Garrity		DLP577
Kelly Lawrence	Deal Town Council	DLP2167
Sarah Gleave	Dover and Deal Green Party	DLP2854

Alan Byrne	Historic England	DLP1670
Mike Eddy	Walmer Parish Council	DLP2040
	Church Commissioners	DLP1701
David Spence-Reid		DLP3139
Ben Young	The Land Trust	DLP1953
David Reid		DLP3510
Barbara Cooper	Kent County Council	DLP1769
Patrick Murfet	Bee Equipment Ltd	DLP1183
Jason Ransley	Dover Harbour Board	DLP1240

7 respondents stated that they agreed with the policy and no respondents stated that they objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
Strong support for the policy was received from one of the respondents.	Comment noted and welcomed.
The wording in DM44 does not fully reflect the guidance in the NPPF relating to substantial public benefits versus substantial harm in the case of total loss. Historic England suggest it is re-worded to bring it in more in line with the NPPF approach.	Policy and supporting text will be updated to more fully reflect the NPPF.
The wording in paragraph 12.14 should amended for clarity to: “substantial harm to grade II listed buildings or grade II Registered Parks and Gardens should be exceptional”.	Policy and supporting text will be updated to more fully reflect the NPPF.
Substantial harm to the setting of a heritage asset is not indicated in the NPPF, only to the significance of a heritage asset, and consequently reference to the former should be removed.	Policy and supporting text will be updated to more fully reflect the NPPF.
The NPPF makes a clear distinction between substantial harm for designated and non-designated heritage and this distinction between the two types of asset is important and should be better reflected in the wording of the policy.	Policy and supporting text will be updated to more fully reflect the NPPF.

<p>DM44 is welcome in that it refers not solely to the heritage asset but also to the setting of the asset. There is also a requirement for a Heritage Statement where a “heritage asset or its setting” are likely to be affected.</p>	<p>Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.</p>
<p>DM44 is weakened by not explicitly requiring conservation of an asset by recording, which would like it more directly to DM46. A suggested addendum to this policy would be at the end of the third paragraph: “... securing the optimum viable use of the heritage asset or ensuring its preservation through appropriate recording.”</p>	<p>The policies enable changes to heritage assets to be assessed on their own merits within Listed Building Consent or planning applications as appropriate following full assessment of the significance of the heritage asset and the impact of the proposed works on the significance, supported by submitted information including Heritage Statements.</p>
<p>No mention of Moats Bulwark, the appropriate restoration and landscaping of which would be an improvement to the area.</p>	<p>Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan.</p>
<p>There is no specific mention of the former colliery site in Snowdown. Yet again, Aylesham and Snowdown has been overlooked.</p>	<p>Specific reference to individual sites/buildings of historic interest is not necessary as they are covered by the proposed policies within the plan.</p>
<p>The whole building approach to developments involving energy conservation improvements is to be welcomed.</p>	<p>Comment noted and welcomed.</p>
<p>It is important that retro-fitting of insulation to older properties does not compromise their appearance or weather resistant properties. It would be helpful for the fourth paragraph of Policy DM44 to include reference that any installation of energy efficiency improvements do not compromise their appearance.</p>	<p>Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.</p>

<p>The Local Plan should consider relaxation of the rules regarding triple and double glazing and instead find the best, conservation-friendly solutions. Advice from the Council to homeowners on improving their properties may be beneficial.</p>	<p>The policies enable changes to heritage assets to be assessed on their own merits within Listed Building Consent or planning applications as appropriate following full assessment of the significance of the heritage asset and the impact of the proposed works on the significance, supported by submitted information including Heritage Statements.</p>
<p>Policy should be worded positively to encourage new development that enhances heritage assets.</p>	<p>Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.</p>
<p>A cable car from Dover Castle to Western Heights via a car parking area in Pencester St.James would benefit tourism.</p>	<p>The policies enable changes to heritage assets to be assessed on their own merits within Listed Building Consent or planning applications as appropriate following full assessment of the significance of the heritage asset and the impact of the proposed works on the significance, supported by submitted information including Heritage Statements.</p>
<p>Paragraph 12.18 should include a reference to the need to consult relevant Conservation Area Appraisals (CCA) and the Dover Archaeological Characterisation (for Dover Town Centre). The Dover District Heritage Strategy will not on its own provide the information needed to write the Heritage Statement. The Heritage Strategy highlights the main issues to be considered</p>	<p>Proposed written guidance on Heritage Statements will include reference to sources of information, including conservation area appraisals, Kent Historic</p>

but the applicant will need to access wider sources of information and, potentially, specialist advice.

Environment Record, etc. Paragraph 12.18 will be amended to clarify.

Summary of Proposed Changes

- Will be amended to ensure that the reference to the level of harm on significance as a result of total loss and the public benefit weighting is aligned with the NPPF.
- Policy and supporting text will be updated to more fully reflect the NPPF.
- Heritage Statements will include reference to sources of information, including conservation area appraisals, Kent Historic Environment Record, etc - will be amended to clarify.

DM Policy 45: Conservation Areas (Reg 19 Policy HE2)

In total 14 representations were made on this policy by 14 consultees.

Representations were received from:

Name	Organisation	Comment ID
Derek Leach	Dover Society	DLP3062
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1915
Peter Weatherhead	Wingham Conservation Group	DLP3177
Kelly Lawrence	Deal Town Council	DLP2168
Sarah Gleave	Dover and Deal Green Party	DLP2855
Alan Byrne	Historic England	DLP1671
Mike Eddy	Walmer Parish Council	DLP2041
	Church Commissioners	DLP1702
Bridget Fox	Woodland Trust	DLP3734
Barbara Cooper	Kent County Council	DLP1770
Keith Holness	Nonington Parish Council	DLP2190
Ms C Smith		DLP3735
Seb Willett	Langdon Parish Council	DLP1264
Christine Haggart	Ash Parish Council	DLP1234

9 respondents stated that they agreed with the policy and no respondents stated that they objected to the policy.

Summary of Representations – Main Issues

Council's Response – Proposed Changes

KCC support the policy and the commitment in the preamble to the development of further Conservation Area Appraisals.	Comment noted and welcomed.
St Margaret's-at-Cliffe Parish Council strongly support the policy.	Comment noted and welcomed.
Draft policy goes beyond the primary legislation (Planning (Listed Buildings and Conservation Areas) Act 1990) which requires only that 'special attention' should be paid to "the desirability of preserving or enhancing a Conservation Area". The draft policy states proposals which preserve or enhance a Conservation Area's character will be supported (which of course is desirable) but, while this may seem only subtle difference from the Act, decisions based upon such a policy may be open to challenge.	Policy and supporting text will be updated to more fully reflect the primary legislation.
Policy DM28 notes the importance of the impact of shutters to shop fronts in conservation areas and should be reflected in DM45.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Policy should be amended to include development/redevelopment within the setting of a conservation area should also comply with the criteria set out in DM46.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Policy should be amended to state that development will 'only' be supported where it preserves or enhances the conservation area and its setting.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The policy is welcomed as it provides support to the aims of many local communities to preserve and enhance their local conservation areas. Although the definition of 'unacceptable' will be contentious.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Support the inclusion of important views into or out of the area within the policy.	Comment noted and welcomed.

Policy should include consideration to reducing heat and energy loss and to sensitive solutions to providing energy efficient heating systems.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Policies should be positively worded and to encourage new development that enhances heritage assets.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The policy would be strengthened by including reference to tree lines and urban hedgerows. Such green links play a valuable role in framing residential areas and connecting existing habitats.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Traffic should not have an impact on the character of the CA.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
Where the local planning authority cannot dedicate direct resource to development of conservation area appraisals for all parishes then parish/town councils should be encouraged to undertake this work. A scheme of subsidy, financial assistance or professional support should be put in place to enable local communities to actively contribute to this work.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.

Summary of Proposed Changes

- Policy and supporting text will be updated to more fully reflect the primary legislation

DM Policy 46: Archaeology (Reg 19 Policy HE3)

In total 6 representations were made on this policy by 6 consultees. Representations were received from:

Name	Organisation	Comment ID
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Derek Leach	Dover Society	DLP3064
Kelly Lawrence	Deal Town Council	DLP2169
Sarah Gleave	Dover and Deal Green Party	DLP2856
Mike Eddy	Walmer Parish Council	DLP2043
Barbara Cooper	Kent County Council	DLP1771
Sara Sweeney	Kitewood	DLP3582

4 respondents stated that they agreed with the policy and no respondents stated that they objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
KCC welcomes the commitment to a Dover Town Archaeology Supplementary Planning Document (SPD), which will help ensure that the outputs of the Dover Urban Archaeological Database Project are fully integrated into policy and thereby support the protection and enhancement of Dover’s internationally important archaeological remains.	Comment noted and welcomed.
Clarification is required to note that it is in the SPD that ‘primary and secondary’ archaeological character zones will be identified.	Comment noted and amendment to supporting text made.
Commercial pressures from developers must not be allowed to override the need to investigate and record important archaeological features.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
KCC recommends that the penultimate paragraph be replaced with: “Where development proposals affect non-designated heritage assets with an archaeological interest, the District Council would expect the archaeological deposits to be preserved in-situ. Where this is not possible clear justification will be required. Where the justification is accepted a programme of archaeological excavation and recording is likely to be required to be carried out. The fieldwork will be appropriate to the significance of the archaeological deposits and must be carried out by an appropriately qualified contractor following a written specification agreed by the District Council. The programme will include all phases of desk-based and fieldwork, post-excavation analysis, publication of the results and	Policy will be amended in line with the recommendation.

deposition of the site archive in an appropriate repository.”	
Policy should be amended to afford flexibility in terms of the timescale for geophysical work to be carried.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.

Summary of Proposed Changes

- Policy will be amended to ensure appropriate protection for non-designated heritage assets of archaeological interest.

DM Policy 47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area (Reg 19 – Policy Moved to settlements chapter – Dover site allocation)

In total 9 representations were made on this policy by 9 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP40
Derek Leach	Dover Society	DLP3065
Sarah Gleave	Dover and Deal Green Party	DLP2857
Kelly Lawrence	Deal Town Council	DLP2170
Julie Davies	CPRE	DLP3730
Alan Byrne	Historic England	DLP1672
Mike Eddy	Walmer Parish Council	DLP2045
Stuart Robinson	Dover Citadel Ltd	DLP1105, 2065
Barbara Cooper	Kent County Council	DLP1772

2 respondents stated that they objected to the policy.

Summary of Representations – Main Issues	Council’s Response – Proposed Changes
An objection was received from one respondent due to the lack of reference to a commitment to scrub clearance to protect the unimproved chalk grass land.	This is covered by policies in the Natural Environment chapter.
Policy makes reference to the “Dover Western Heights Masterplan (2015)” which is not on the website.	The Dover Western Heights Masterplan (2015) is available on the

	website within the Evidence Base.
DM47(h) requires development to comply with the Delivery Principles of the Masterplan. CPRE object to development on land at Farthingloe, now housing allocation DOV012. The Masterplan needs to be amended to exclude reference to DOV012. The second line of the penultimate paragraph refers to 'views'.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The penultimate paragraph should be amended to 'views into and out from'.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
The policy rightly emphasises the importance of the intervisibility of features both within the monument and within the wider landscape in order to fully understand the historic significance of the monument.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
A suggestion to include an additional bullet point to support capitalising on opportunities to reduce risk across the whole site. As currently phrased the policy could inadvertently prevent all development, whether bringing benefits or not, and could be amended to better reflect the requirements to balance harm with benefits.	Comments noted and are largely addressed within the Plan and through the policies, where the issues are within the scope of the Local Plan.
A specific policy dealing with any developments within the Lydden Valley/former Wantsum Channel is necessary due to its potential contribution to the understanding of the creation of the English Channel.	We need to fully consider whether changes should be made to the policy to address the issue of capitalising on opportunities as they arise. This will be carried out in collaboration with Historic England due to the scheduled status of the Western Heights.
An objection was received from one respondent on the grounds that the requirement to comply with the Delivery Principles of the Dover Western Heights	Comments noted and are largely addressed within the Plan and through the

Masterplan (2015) does not provide a sufficiently robust basis to address the current challenges in conserving this important heritage asset or relate to other important aims set out in the draft Local Plan.	policies, where the issues are within the scope of the Local Plan.
KCC recommends that the District Council re-engages with the Dover Western Heights Masterplan Action Plan so that it can be taken forward and the future of the monument be secured.	Comments noted.

Summary of Proposed Changes

- No significant changes will be made

Note: Policy DM47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area policy has been relocated to the Dover settlement section of the Regulation 19 Local Plan.

DM Policy 48: Historic Parks and Gardens (Reg 19 Policy HE4)

In total 5 representations were made on this policy by 5 consultees. Representations were received from:

Name	Organisation	Comment ID
Derek Leach	Dover Society	DLP3066
Sarah Gleave	Dover and Deal Green Party	DLP2858
Kelly Lawrence	Deal Town Council	DLP2171
Mike Eddy	Walmer Parish Council	DLP2047
Barbara Cooper	Kent County Council	DLP1773

4 respondents stated that they agreed with the policy and 1 respondent had no comments to make on the policy.

Summary of Representations – Main Issues	Council's Response – Proposed Changes
KCC support the policy.	Comment noted and welcomed.
Policy DM 48 Historic Parks and Gardens to be renumbered accordingly to take account of an additional policy regarding the Lydden Valley/Wantsum Channel.	Archaeological sites, whether designated or undesignated, are covered by the policies within the plan, in

	particular policy DM44 and 46.
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Summary of Proposed Changes

- No significant changes will be made

Historic Environment – Regulation 19 Policy names and changes

Note that in the Regulation 19 Plan the policy titles and numbers in this chapter have been amended to:

Reg 18 Policy	Reg 19 Policy
<i>SP 18 – Protecting the Districts historic environment</i>	<i>SP15 - Protecting the Districts Historic Environment</i>
<i>DM Policy 44 – Designated and Non designated heritage assets</i>	<i>HE1 - Designated and Non-designated heritage assets</i>
<i>DM Policy 45 - Conservation Areas</i>	<i>HE2 - Conservation Areas</i>
<i>DM Policy 46 - Archaeology</i>	<i>HE3 - Archaeology</i>
<i>DM Policy 47 – Dover Western Heights Fortifications Scheduled Monument and Conservation Area</i>	<i>Moved to settlements chapter</i>
<i>DM Policy 48 – Historic Parks and Gardens</i>	<i>HE4 - Historic Parks and Gardens</i>

PART B – Representations made on Appendices

Appendix 1 - Settlement Hierarchy

In total 12 comments were made on the Settlement Hierarchy. A summary of the representations received and the council's response to these representations is set out below.

General Representations on the Settlement Hierarchy

In total 13 representations were made to this Appendix by 13 consultees. Representations were received from:

Name	Organisation	Comment ID
Peter Jull		DLP41
Mrs Susan Taber		DLP549
Mark Norcliffe		DLP392
Dr Raju Sakaria		DLP624
Mrs Rosemary May		DLP2680
James Mitchell		DLP652
Mrs Klaire Lander		DLP3602
Rosie Rechter		DLP953
Barbara Cooper	Kent County Council	DLP1774
Cllr Peter Walker	DDC (Aylesham, Eythorne and Shepherdswell Ward)	DLP2044
Keith Holness	Nonington Parish Council	DLP2191
Chris Shaw		DLP1203
Robert Botwright		DLP2308

Summary of Representations – Main Issues	Council's Response – Proposed Changes
2 representations support the Hierarchy	Comments noted and welcomed.
Question the designation of Shepherdswell as a Local Centre, citing the closure of one of its two pubs together with its Post Office in the last 2 years, the current part-time post office and medical service and	The position of Shepherdswell in the hierarchy is based on it having one public house

<p>the lack of any premises that serves food in the evenings.</p>	<p>and no post office (Section 5 Settlement Summaries and Table 2 of the Rural Settlement Hierarchy Study)</p>
<p>Ripple, Northbourne, Goodnestone and East Langdon should not be categorised as large villages.</p> <p>Suggest that Studdal, Staple with Barnsole could expand with limited adverse impact on their existing character and should therefore be classified as larger villages.</p>	<p>Comments noted. The position of these villages in the hierarchy reflects the range of the services and facilities present.</p>
<p>Ewell Minnis should be defined as a hamlet, given that it is similar in scale to Wingham Green.</p>	<p>Only settlements that have at least one sustainability indicator facility are included and where settlement confines are defined, are included in the Hierarchy. Ewell Minnis does not meet such criteria.</p>
<p>Object to Deal's classification as the second settlement in the District as the infrastructure is not present to support mass development of the town and the charm of the town is slowly being lost.</p>	<p>With a population of 30,085 in 2011, Deal is home to approximately 27% of the population of the District and clearly the second settlement within the hierarchy of settlements in Dover District behind the town of Dover with 43,070 in 2011.</p>
<p>The position of Eythorne as a Local Centre is misplaced and based on inaccurate information.</p>	<p>The settlement summary for Eythorne in Section 5 'Settlement Summaries' of the Rural Settlement Hierarchy Study has been corrected to reflect the closure of two of the three pubs in the village in recent years.</p>
<p>Object to the impact on Nonington of increased transport resulting from development in Aylesham and Elvington as the methodology employed in the Rural Settlement Hierarchy to demonstrate sustainable transport is limited to establishing the proximity of new housing to a bus stop and/or train station.</p>	<p>Comments noted. The methodology used in the Rural Settlement Hierarchy Study is based on nationally accepted indicators of sustainability in rural communities and AMR survey indicators.</p>

Some of the rural settlements, including Betteshanger, need more protection, especially on biodiversity grounds.	Comments noted. Policy SP3 requires any development coming forward in rural settlements such as Betteshanger not to result in harm to biodiversity, which is also protected by Policy SP17 of this Plan.
It is important that growth in local rural services centres and village designations must be supported by infrastructure and services, including public transport, to ensure that they can provide for sustainable growth.	Comments noted. Delivery of infrastructure and healthy communities is addressed by Policies SP15 and SP13 while Policy DM34 addresses community facilities in place making.
Ringwould facilities are more limited than the Hierarchy states. The Pub only offers a limited service and the shop has been closed since 2019 and is a site allocation (RIN004)	The Settlement Hierarchy has been updated to reflect these changes.

Appendix 2 - Housing Trajectory

In total 2 representations were made on the Housing Trajectory by 2 consultees. Representations were received from:

Name	Agent / Organisation	Comment ID
Dr Raju Sakaria		DLP625
Rosie Rechter		DLP954

Comment	Councils Response
Why does the cumulative supply balance have to be in excess of target?	The housing growth strategy as set out in the Regulation 18 version of the Local Plan provides for housing in excess of the Local Housing Need target. This to allow for supply resilience and contingencies.
The trajectory is very steep, especially as DDC has no plan to address insufficient infrastructure to support the proposed development	The Local Plan proposes a series of housing allocations that will increase the number of sites for housing. This will result in a stepped increase in housing delivery.

	As the Local Plan progresses towards examination and more certainty is known about the final sites for the Plan, an Infrastructure Delivery Plan will be produced to help mitigated the impact of development
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PART C - Representations made on Evidence Base Documents

Sustainability Appraisal (SA) and Habitat Regulation Assessment (HRA)

Consultation Comment	SA Report Reference	Response / Action Taken
SA23 (Natural England)		
<p>We advise that the following is revised:</p> <p>“SA 9.1: Does the Plan avoid, mitigate and offset adverse effects on designated and undesignated ecological assets within and outside the District, including the net loss and fragmentation of green infrastructure?”</p> <p>We advise that the term offset should be removed.</p>	Chapter 3 – SA Framework	SA objective 9.1 edited.
We advise that biodiversity net gain targets are included to provide evidence of a measurable uplift in biodiversity through the execution of the Local Plan.	Appendix B – Biodiversity Policy Context.	Reference to draft national biodiversity net gain target added.
We further advise that water use targets in line with our recommendations above are included in the SA.	Appendix B – Biodiversity Policy Context.	Reference to future national water use target added.
SA25 (Historic England)		
We are content that the sustainability appraisal report for Dover local plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.	General comments	Noted.

Consultation Comment	SA Report Reference	Response / Action Taken
DLP1539 (Environment Agency)		
D5 reiterates the shortfalls in demand to 2031.	Table 3.1: Key sustainability issues	Noted.
Appendix B para B.145 reiterates the statistics from the outdated Kent Environment Strategy.	Appendix B – Water Quality	The most up to date evidence available was relied on in the production of Appendix B. The references and associated facts and figures in Appendix B will be updated through subsequent iterations of the SA.
The reasoning behind the domestic water efficiency standard presented in paras 6.84 - 6.87 is well argued.	Chapter 6 – SA of Water Efficiency Policy options	Noted.
DLP1819 (Highways England)		
Strategic highway infrastructure policy option B is likely lead to a situation where other development coming forward, not allocated, would be exempt from contributions (Para 6.413). Highways England is supportive of this policy towards the A2 and will work with Dover Council as part of the RIS3 programme for improvements on the A2.	Chapter 6 – SA of Transport and infrastructure Policy options	The Council has elected to include a policy supporting upgrades to the A2 because it represents the option which is likely to yield the greatest financial support for the strategic infrastructure project.
With regards to Highway network and safety, the Council has chosen to focus on a flexible approach to Transport Assessments and Travel Plans in order to force the onus on developers to prove their management of the highway network and overall impact. Highways England agrees		Noted.

Consultation Comment	SA Report Reference	Response / Action Taken
with the flexible approach indicated in Option A and chosen within the DDLP.		
The Council is not seeking to introduce CIL as a financial obligation, but proceed with utilising existing S106 and S278 Agreements as mechanisms for collecting developer contributions. Highways England agrees with this approach.		Noted.
With regards to the Strategic Highways Infrastructure, the SA notes in Para 6.407 that the Council considered three options. Option A was selected as it was likely to offer the greatest financial support for upgrades to the A2 as a strategic infrastructure project. Assessment by both Dover Council and Highways England will provide the final test of the proposals and determine appropriate mitigation needs. For this reason, Highways England is confident that the potential negative effects of the DDLP policies can be effectively managed throughout the life cycle of the plan.		Noted.

Consultation Comment	SA Report Reference	Response / Action Taken
<p>With regards to Sustainable Travel and the policies outlined within the DDLP, the SA notes that while sustainable travel is encouraged and supported in the DDLP with improved connection for public transport and active travel (cycling and walking), a minor adverse effect is also recorded for improvements on the SRN. Improvements to the SRN are likely to increase capacity and improve journey time reliability, which by their very nature, may attract more private vehicle use vs lowering overall car use. This is an accepted side effect of improvements to any road network and as such is not considered to have a significant impact. What is more important is that the attractiveness of the public transport modes and active cycle/walking links are designed in such a way as to make the choice of a car the last consideration. Prioritising other modes over that of the vehicle is likely to encourage a significant mode shift. As such, Highways England has no concerns with regards to how sustainable travel is managed within the DDLP.</p>	<p>Chapter 6 – Secondary, cumulative and synergistic effects</p>	<p>The minor negative effect recorded for SA objective 4 (sustainable travel) is acknowledged in recognition of the fact that a significant number of homes (1,875) were to be delivered in relatively rural areas where good accessibility to a wide range of local services and facilities and jobs is less readily available. Overall, these adverse effects are recorded as relatively minor in acknowledgement of the Draft Local Plan’s focus on only delivering homes in rural locations at a scale consistent with their accessibility, infrastructure provision and level of services available. This judgement also acknowledges that considerable investment in the strategic highway network is planned over the Plan period.</p>
<p>SA12, SA13 (Campaign To Protect Rural England (CPRE))</p>		
<p>D3 sets out that the Plan provides an opportunity to set out measures to mitigate exceedances in the AQMAs without inhibiting the need for the District to grow. It will be important that allocations, both individually and cumulatively, do not increase air pollution resulting in the need for the establishment of new AQMA.</p>	<p>Key sustainability issues for Dover District (Table 3.1)</p>	<p>Noted. It is considered that this issue is covered through the existing wording.</p>

Consultation Comment	SA Report Reference	Response / Action Taken
<p>E4 notes that the District has an obligation to contribute to the national carbon reduction targets through the generation of low carbon and renewable energy, including decentralised energy networks, and encouraging energy efficiency measures in new and existing buildings. Whilst adaptation and mitigation will be part of the solution the location of new development can either help or hinder. The SA should recognise that a sustainable pattern of development will also help address the climate change challenge. The sustainability framework (Table 3.2) should be enhanced to ensure that the Plans location of new development supports a sustainable pattern of development for existing and future residents.</p>		<p>Additional wording added to Tables 3.1 and 3.2 to reference the importance of a sustainable pattern of development in combating climate change.</p>
SA24 (Southern Water)		
<p>Southern Water have commented that the following points in the Sustainability Appraisal look to highlight foul capacity issues in the Dover District Area (4.77, B.154, C.92, C.94, C.95, C.103). In respect of the above statements, Southern Water are currently carrying out a project in Whitfield to overcome the foul issues that would be caused by increased housing during the timeline of the Local Plan. The aim of the project is to provide storage upstream of Sandwich Road pumping station that will prevent the flooding of the local properties. The flooding of local properties has occurred since 2014 and has recently been exacerbated by the new development in the area as mentioned in the paragraphs noted above. At the</p>	<p>Appendix B – Water Quality</p>	<p>Reference to Southern Water’s work at Whitfield has been added to 4.77, Appendix B and C.</p>

Consultation Comment	SA Report Reference	Response / Action Taken
<p>time the project was prepared, the area in Whitfield was projected to experience growth of 5,750 properties by 2035, taking the overall number of properties draining to Sandwich Road pumping station to 7,453. We have calculated as part of the project that 1,200m³ of storage will be required for these 7,453 properties to prevent further flooding of the network. This storage has taken the form of a shaft, and it is intended that this storage will then be converted into an oversized wet well for a long term solution which consists of pumping approximately 12km to Broomfield Bank WTW. Therefore the foul network should not be seen as a blocker to development in the Whitfield area and Southern Water would request for this to be noted within the draft sustainability report.</p>		
DLP3569 (Savills)		
<p>There are a number of areas of the SA that we consider flawed as there is limited information available to detail how the site has been assessed against each criteria. Further detail is therefore required to outline how the SA corresponds with the draft strategic or development management policies. Savills has provided comments on the SA, in relation to the promotion at the Land east of Northbourne Road in the context that the present version applies to the reduced allocation set out within GTM003, rather than the entirety of the promoted site. These comments should be considered as part of any revision to</p>	<p>Site GTM003 SA findings.</p>	<p>Justification for effects identified for the site at Great Mongeham can be found in paragraphs 5.36 and 5.38 and Appendix D. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site option has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given</p>

Consultation Comment	SA Report Reference	Response / Action Taken
<p>the SA, should the allocation be expanded across the wider site.</p> <p>The SA States that the proposal will result in significant adverse impacts to resources, as well as minor negative effects to the Historic Environment, Climate Change, Transport and Access to Amenities. This is not considered justified as there are multiple ways to ensure or mitigate these impacts, which have not yet been accounted for in the SA.</p> <p>In accordance with this, Table 4.2 sets out the proposed changes to the SA findings as suggested by Savills and following the production of further technical work.</p> <p>The SA does not account for the relative sustainability of the site, specifically when considering its close proximity to local bus services and the wider Great Mongeham settlement.</p> <p>The proposed SA findings demonstrate the potential benefits of the wider proposal on each objective, including the potential for biodiversity net-gain across the site and the use of renewable technology on the site to promote resilience across the site. As such, it is considered that the proposal will be able to enhance the baseline levels on the site.</p>		<p>location had not been defined at this stage in the plan-making and associated SA process.</p> <p>Site GTM003 has been allocated in the Draft Local Plan Site Allocations Policy 1: Housing Allocations, which contains reference to appropriate mitigation measures. The significant effects of Site Allocations Policy 1 are set out in Table 6.4 of the SA Report. Accompanying justification for the effects identified are set out in paragraphs 6.183 to 6.245.</p> <p>Paragraph 6.248 states with regards to the significant negative effects identified for SA objective 5 (natural resources), as long as the loss of greenfield land is minimised, and in particular land recognised as having agricultural or mineral value, the physical loss of these finite resources cannot be mitigated further. Similarly, other potential environmental adverse effects identified against SA objectives 2 (health and well-being), 4 (travel) 7 (climate change adaptation), 8 (climate change mitigation), 9 (biodiversity), 10 (historic environment) and 11 (landscape) are a product of the location of the selected allocations.</p> <p>Table 6.11 of the SA Report summarises the negative effects that could arise from the implementation of the individual Draft Local Plan policies in relation to each SA objective and how these are likely to be mitigated by other policies in the Draft Local Plan.</p>

Consultation Comment	SA Report Reference	Response / Action Taken
SA28 (Barratts)		
<p>Of the options considered, Barratt consider DDC should proceed with spatial options A, B or E whereby development is distributed more evenly across the district in areas on suitable and achievable sites that can be delivered in areas where new homes and infrastructure is required. This is preferable to the proposed approach within the Regulation 18 Local Plan which seeks to continue a focus of development in Dover Town. It is also recommended that DDC seek to maximise growth and move forward with an ambition to deliver the highest growth option to boost significantly housing in accordance with NPPF paragraph 59. Recommendation: DDC proceed with spatial options A, B or E and seek to deliver the highest growth option.</p>	<p>Growth/spatial options SA – Chapters 4 and 6</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4 and Appendix C.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial options had not been defined at this stage in the plan-making and associated SA process.</p> <p>Paragraph 6.143 sets out the councils reasoning behind the selection of the preferred housing growth option: The minimum objectively assessed housing needs of the District in line with Growth Options 1 or 2 using a spatial strategy guided by the District’s settlement hierarchy (Spatial Option C) but also avoiding the District’s key environmental constraints (Spatial Option D). To ensure deliverability the spatial strategy is also influenced by site availability (Spatial Option A). This combination of growth and spatial options is considered to be consistent with the guidance set out in the Strategic Housing Market Assessment (2017) which concludes that a cautious approach is needed to the housing target unless significant economic interventions, such as regeneration,</p>

Consultation Comment	SA Report Reference	Response / Action Taken
SA3 Robert Botwright		
<p>RIN004, on the former Ringwould Alpines site, and the associated RIN002, have both been incorrectly described in the HELAA as brownfield/part brownfield historically. Furthermore, site RIN004 should be record as lying within the Kent Downs AONB, and that a traffic assessment would be required. It seems there has been an error or accidental omission as these points, as these are now missing from the current Site Allocations Policy 1 Non-Strategic Housing Allocations. This should be corrected.</p>	<p>Site RIN002 and RIN004 SA findings.</p>	<p>The SA of site options against SA objective 5 (Resources) focusses on the agricultural land classification of land and its environmental quality rather than its greenfield or brownfield status. The SA of site options against SA objective 11 (Landscape) draws on the Council's HELAA Landscape Environment Assessment – Landscape sensitivity Assessment. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p>
SA8, SA9 David Stewart		
<p>Table 4.2 incorrectly assesses the impact of growth scenario C. Each category needs to be reassessed to accurately reflect detrimental impact of this growth option.</p>	<p>Growth/spatial options SA findings – Table 4.2</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4 and Appendix C.</p> <p>The SA of the growth/spatial options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location in these broad growth/spatial options had not been defined at this stage in the plan-making and associated SA process.</p>

Consultation Comment	SA Report Reference	Response / Action Taken
<p>Table fails to correctly assess the impacts of the development of sites EAS002 and EAS012 on Travel, Employment, Health and Wellbeing, Air Pollution and Natural Environment. Reassessment is required to take account of these impacts.</p>	<p>Eastry residential site options SA findings – Table 5.4</p>	<p>Justification for effects identified for the sites options in and around Eastry can be found in paragraphs 5.33 and 5.34 and Appendix D. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>SA11 Gary Bristow</p>		
<p>Objection to further housing growth in Deal. Sites DEA020 and DEA008 are identified as remote options in the Plan, but in the same breath these sites are put forward for consideration. The weakest performing site options are located in generally the remotest locations south of Walmer (WAL002) and west of Sholden (DEA020 and DEA008) where there is generally greater scope for significant adverse effects on the Districts environment. I would request, these sites are removed from the plan.</p>	<p>Deal residential site options SA findings – Table 5.2</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix D. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact</p>

Consultation Comment	SA Report Reference	Response / Action Taken
		scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.
SA16, SA17, SA18, SA19 Dee Damms		
<p>Objection to the allocation of site SHE003 on the grounds of A) Impact on narrow lanes, particularly those without pavements on Westcourt Lane and Church Hill. B) More traffic congestion. Traffic will also be aggravated by major developments in Eythorne/Elvington. C) Inadequate access points to new sites and especial problems for emergency vehicle access. D) Impact on natural habitats for flora and insects as well as roadside nature reserves. E) Increased risk of flooding F) Harm to villages local distinctiveness and quality of life. G) Lack of infrastructure for schooling and access to GPS H) Characterisation of Shepherdswell in the same settlement hierarchy as Wingham, St Margarets and Ash, villages with considerably more facilities. I) Failure of DDC to give communities adequate time to consider the plan with the eight weeks consultation taking place in a pandemic lockdown.</p>	<p>Shepherdswell with Coldred residential site options SA findings – Table 5.4</p>	<p>Justification for effects identified for the sites options in and around Shepherdswell with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix D. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
<p>Objection to the allocation of site SHE004 on the grounds of A) More traffic and congestion problems in the village B) Inadequate access points to new site and problems for emergency vehicle access C) Harm to villages local distinctiveness and quality of life D) Harmful impact on landscape and appearance of countryside. Damage to</p>		

Consultation Comment	SA Report Reference	Response / Action Taken
<p>distinctive and unique views across east Kent. Development close to North Downs Way, much used by walkers, which provides villagers particularly young, older people and dog walkers safe access to the countryside without danger from vehicles E) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes, especially those without pavements on Cox Hill. Increased danger to pedestrians and cyclists. B) More traffic and congestion. C) Impact on natural habitats, roadside nature reserves, flora and insects. D) Increased risk of flooding. E) Harm to villages quality of life. F) Failure of DDC to give communities adequate time to consider the plan in a pandemic lockdown.</p>		
<p>Objection to the allocation of site SHE004 on the grounds of A) Impact on narrow lanes B) More traffic and congestion C) Inadequate access points to new site D) Impact on natural habitats for flora and insects and nature reserve E) Harm to villages local distinctiveness and quality of life F) Failure of DDC to give communities adequate time to consider the plan during a pandemic lockdown.</p>		

Consultation Comment	SA Report Reference	Response / Action Taken
SA20 Russell Thompson		
<p>With regards to DM Policy 11, the consultee raises that existing developments in the District is of the same bland design. Local Plan should promote more sustainable housing developments that offer exciting environmentally sensitive designs. Local Plan should require all new housing to be built to the governments proposed 2025 Green Standards as a minimum.</p>	<p>SA of DM Policy 11 (Type and Mix of Housing)</p>	<p>A record and appraisal of the reasonable alternatives considered for DM Policy 11 can be found in paragraphs 6.159-6.162. The reasons for the selection of the preferred option can be found in paragraph 6.163. Table 6.4 sets out the likely effects of DM Policy DM 11. Justification for the two significant positive effects identified can be found in paragraphs 6.184 and 6.197.</p>
SA22 Charles Pottle		
<p>Objection to the allocation of sites in Sheperdswell, in particular SHE003. The objection cites a number of sustainability issues that make the sites unsustainable: The infrastructure and road network in the village will not be able to cope with additional housing. The roads are single width country lanes - totally unsuitable for the massive increase in traffic from 100+ new homes. There are no footpaths and no possibility or space for any. Very dangerous and the plans do not address this in any way. Poor access to public transport, will lead to congestion. Water and sewage systems are also cited as under pressure. Suggests alternative locations where there is the road, water, education and health infrastructure to accommodate growth.</p>	<p>Shepherdswell with Coldred residential site options SA findings – Table 5.4</p>	<p>Justification for effects identified for the sites options in and around Shepherdswell with Coldred can be found in paragraphs 5.33 and 5.34 and Appendix D. The Council's justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>

Consultation Comment	SA Report Reference	Response / Action Taken
SA5 Andrew Carson		
<p>Objection to the allocation of site WAL002 on the grounds that the gas network is problematic, the drains block regularly and the Glenn road is not suitable for more traffic.</p>	<p>Deal residential site options SA findings – Table 5.2</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix D. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p>
SA15 Thomas Moggach		
<p>Objection to the allocation of site WAL002 on the grounds that A) This is an area of great natural beauty and the development would seriously damage the landscape and wildlife habitats in the area. B) This land only has one road leading to it and has flooded in the past.</p>	<p>Deal residential site options SA findings – Table 5.2</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix D. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact</p>

Consultation Comment	SA Report Reference	Response / Action Taken
		scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.
SA21 Simon Dundas		
The consultee suggests the spatial options should take into account whether an area has reached its maximum housing figure, advocating that is not always reflected in a population based approach. Opposed to further rural housing growth on the grounds that A) Existing infrastructure cannot cope with additional housing, B) Impact on tourism - adding more housing to existing villages will destroy the rural image tourists enjoy for walking and cycling.	Definition of reasonable spatial options for SA – Paragraph 4.27	The spatial options identified have been defined based on a general assumption that additional growth will be supported by new and improved infrastructure, services and facilities to accommodate the existing and future needs of communities.
SA26 Aaron Snow		
Table 5.2 Deal residential site options SA Findings (Chapter 5): Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b, SA6, SA3.	Deal residential site options SA findings – Table 5.2	Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix D. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E. The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given

Consultation Comment	SA Report Reference	Response / Action Taken
		<p>location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>
SA27 Jason Snow		
<p>Table 5.2 Deal residential site options SA Findings (Chapter 5) Transparency providing how these SA figures were calculated, and the dates when assessment was carried out, the qualifications of the person who deemed WAL002 suitable for this plan have not been provided. The details and findings within the SA do not provide the accurate and correct information this SA is incorrect. Examples are SA2b,SA6,SA3.</p>	<p>Deal residential site options SA findings – Table 5.2</p>	<p>Justification for effects identified for the sites options in and around Deal can be found in paragraphs 5.29 and Appendix D. The Council’s justification for the selection of the preferred site allocations over the reasonable alternatives can be found in Appendix E.</p> <p>The SA of the site options has been undertaken comprehensively based on the most up to date evidence available at the time of the assessment. The range of potential significant effects identified represent precautionary judgements based on the fact that the exact scale, density and design of development within any given location had not been defined at this stage in the plan-making and associated SA process.</p> <p>The SA of the site options was undertaken in 2020 in the run-up to the consultation on the Draft Dover District Local Plan (Reg 18).</p>

Consultation Comment	HRA Report Reference	Response / Action Taken
HRA10 (Natural England)		
Natural England support the screening assessments considering likely significant effects on Internationally designated sites.	General	Noted.
Natural England supports all the recommendations made in paragraph 6.7 and would expect to see all the recommendations to be included in the next stage of the Local Plan.	HRA Recommendations (paragraph 6.7).	Noted.
A determination on the adverse effect on integrity of the Dover Local Plan cannot yet be made with respect to the Thanet Coast and Sandwich Bay SPA and Ramsar site. This is because the updated SAMM strategy and relevant tariff details, which are proposed to mitigate for the impacts of increased recreational disturbance resulting from growth, are yet to be confirmed and subsequently considered at the appropriate assessment stage of HRA.	Chapter 6: Conclusions	The HRA of the next iteration of the Dover Local Plan will reevaluate the effect of the Dover Local Plan on the Thanet Coast and Sandwich Bay SPA and Ramsar site, in light of its revised contents and associated evidence and strategic documents, such as the updated SAMM strategy and relevant tariff details.
HRA11 (Southern Water)		
Paragraph 5.169 highlights that “The North East Kent (Thanet) SIP has identified water pollution to be a key threat in relation to these European sites. In particular, the SIP outlined changes in water quality to watercourses that connect to the European sites has been as a result of insufficient treatment of water at WwTW.” The North Thanet	Water quality effects, specifically effects on Sandwich Bay SAC / Thanet Coast SPA and Ramsar / Thanet	Noted. The change will be implemented as appropriate in the next iteration of the HRA Report.

Consultation Comment	HRA Report Reference	Response / Action Taken
<p>SIP states that “Water quality in water courses has suffered from insufficiently treated Sewage Treatment Works discharges.” The action that is related to this statement is “The Environment Agency will collate water quality information in consultation with Natural England to help improve the understanding of water chemistry and biology for the Thanet Coast & Sandwich Bay SPA/SACs. This will aim to improve our knowledge of the sites and establish whether further investigation is desirable.” The Environment Agency (EA) is the water industry's environmental regulator and defines the environmental permits and associated effluent discharge standards that water companies are required to meet from their Wastewater Treatment Works (WWTWs). Southern Water operates within the regulatory parameters of the water industry, in which permit levels and standards are set and monitored by the EA. Southern Water would therefore ask that this statement is changed to (see new text underlined) “In particular, the SIP outlined changes in water quality to watercourses that connect to the European sites has been as a result of insufficient <u>discharge permits and therefore</u> treatment of water at WwTW.”</p>	<p>Coast SAC (paragraph 5.69).</p>	
HRA9 Richard Andrews		
<p>The Zone of Influence (Zol) for this is based on visitor surveys of another, much less well-known and less visited SAC (Lydden to Ewell Downs SAC) leading to a presumed Zol of 4km. The Dover to Kingsdown SAC has a very different catchment of visitors as it contains the world-</p>	<p>Recreation effects on Dover to Kingsdown Cliffs SAC (paragraphs 5.111-5.115) and</p>	<p>No detailed visitor survey data was available at the time of assessment for Dover to Kingsdown Cliffs SAC to determine a specific Zone of Influence. Future iterations of the HRA will be informed through discussions with land managers and Natural England and by any additional</p>

Consultation Comment	HRA Report Reference	Response / Action Taken
<p>famous White Cliffs of Dover, and so the ZOI for this is likely to be much greater than 4km and therefore influenced by a much greater number of new dwellings than only 6,010. So, the magnitude of effects has almost certainly been significantly underestimated by this flawed comparison.</p>	<p>associated recommendations paragraphs 5.133-5.141).</p>	<p>studies, such as visitor surveys of Dover to Kingsdown SAC, to inform the HRA of the Dover Local Plan.</p>
<p>The HRA admits that there is an effect that requires mitigation (Paragraph 5.115). However, the mitigation measures proposed (paragraph 5.133 onwards) do not effectively deal with the specific risks to Dover to Kingsdown SAC for the following reasons. Monitoring through visitor surveys every 5 years, in itself, is not a form of impact mitigation; monitoring alone does not stop visitors trampling and eroding the qualifying chalk grassland of the SAC. Alternative open space provision is recognised as not being particularly effective mitigation for coastal sites, as paragraph 5.137 admits. The HRA goes on to say that in such coastal cases, the focus should instead be on access management and monitoring, but it then gives no detail or certainty on how this will be delivered through the Plan for Dover to Kingsdown SAC - one of the region's busiest sites. In fact, the very next paragraph goes back to talking about alternative open space (which is not applicable to coastal sites).</p>		<p>Future iterations of the HRA will be informed through discussions with land managers and Natural England and additional studies to inform more detailed mitigation measures relation to Dover to Kingsdown SAC.</p> <p>In addition, to safeguard the SAC from additional pressure from recreation, it is recommended that specific planning applications, especially larger ones in proximity to the SAC, will need to consider the requirement to undertake project level HRA and where appropriate would be expected to incorporate necessary safeguards in line with the policy safeguards in the Dover Local Plan.</p>
<p>Paragraph 5.139 talks about Project-level HRA under the heading of 'mitigation'. This is fundamentally flawed, as any future HRA cannot be a form of mitigation. Furthermore, this is simply deferring the decision-making (integrity test) over</p>		<p>Project level HRA is not referenced as a mitigation measure but as an additional safeguard to protect the integrity of the European Sites, offering an opportunity to deliver more detailed and effective mitigation measures</p>

Consultation Comment	HRA Report Reference	Response / Action Taken
potential adverse effects, and therefore does not meet the legal tests of HRA for Plans.		that cannot be determined through the HRA of the Dover Local Plan.
The HRA talks about financial contributions (paragraph 5.140) as a mechanism for mitigation, despite not specifying the mitigation it will pay for, and relates it only to Thanet Coast SPA and Ramsar site.		Not applicable. This mitigation measure relates to the Thanet Coast SPA and Ramsar site only.
The recreational effects of the Plan on Dover to Kingsdown SAC remain a recognised adverse effect that is effectively unmitigated, and therefore the Plan cannot be legally adopted due to significant uncertainty over adverse effects and mitigation. The National Trust at White Cliffs are currently undertaking their own more-detailed HRA related to future visitor increases in consultation with Natural England.		All publicly available data relating to the Dover to Kingsdown Cliffs SAC will be reviewed and considered in the preparation of the HRA of the next iteration of the Dover Local Plan, both of which will undergo consultation.
HRA4 Alan Stokes		
Consultee objects to the development of Site GUS001 (The Lane Guston) on the grounds that – 1. Road access is limited, 2 – Parking is limited, 3 – Pollution from the development will have an adverse impact on the adjacent children’s play area, 4 – Further erosion of countryside.	Site GUS001 (The Lane Guston).	Site GUS001 (The Lane Guston) is identified in the HELAA as potentially suitable, however is not proposed as an allocation and therefore has not been subject to HRA.

Consultation Comment	HRA Report Reference	Response / Action Taken
HRA8 Andrew Hodgson		
<p>Consultee objects to the allocation of development north and south of Aylesham in Strategic Policies 5 and 6 on the grounds of insufficient infrastructure, or planned infrastructure to accommodate growth and associated safety concerns.</p>	<p>Strategic Policies 5 and 6, specifically development north and south of Aylesham.</p>	<p>The consultee's concerns do not relate to the HRA of Strategic policies 5 and 6, specifically their influence on the integrity of European Sites.</p>
HRA5 John Turgoose		
<p>Consultee objects to the allocation of development on Land at Rays Bottom between Liverpool Road and Hawksdown (WAL002) in Policy 1 on the grounds of 1. Road Access, specifically concern that Liverpool Road and Glen Road would not be able to accommodate future traffic growth associated with the site. 2. The drainage system on Liverpool Road is in poor condition. The development of this site will put further and unacceptable strain on the existing drainage system.</p>	<p>Site WAL002 (Land at Rays Bottom between Liverpool Road and Hawksdown)</p>	<p>It is not clear whether the consultee's concerns with regards to drainage extend to pollution run-off or exclusive flood risk. However, the HRA concludes that the development of the site would not affect European Sites as a result of a potential deterioration of water quality associated with pollution run-off from the site.</p>
HRA1, HRA2, HRA3, HRA6 Peter Jull		
<p>The recommendations in paragraph 4.119 of the HRA Report should be revised once the findings of the hydrological study are completed and it is clear as to whether there is a hydrological connection between the Little Stour and Wingham catchment and the Stodmarsh Ramsar.</p>	<p>Water quality effects on Stodmarsh SAC, SPA and Ramsar (paragraph 4.119)</p>	<p>The HRA of the next iteration of the Dover Local Plan will reevaluate the effect of the Dover Local Plan on the Stodmarsh SAC, SPA and Ramsar site, in light of the forthcoming hydrological study.</p>

Consultation Comment	HRA Report Reference	Response / Action Taken
SHE003 is not in the Wingham River catchment area but is listed as such in Table 4.1	Water quality effects on Stodmarsh SAC, SPA and Ramsar (Table 4.1)	Noted. The change will be implemented as appropriate in the next iteration of the HRA Report.
The species count of European Golden Plover for which the Thanet Coast and Sandwich Bay Ramsar site was partly designated is 30 years out of date – the species count needs to be updated to inform the designation of the site and enable an accurate appropriate assessment to be carried out.	Species Count Data Informing the Dover Local Plan and HRA	<p>The HRA has appropriately assessed the potential impacts of the Dover Local Plan in relation to Thanet Coast and Sandwich Bay in line with its designation as an SAC, SPA and Ramsar site.</p> <p>The provision of bird surveys to come forward on a site by site basis within the Dover Local Plan is considered appropriate to assess the cumulative trigger of significance and to inform the provision of offsite mitigation. Specifically, given the nature of the offsite habitat that would be required, Dover District Council can have sufficient confidence in the event that significant number of qualifying bird species are affected that alternative offsite mitigation would be deliverable in the short-term and as such would be in place and functioning before adverse effects on integrity of the European site could occur.</p> <p>To provide additional confidence in this approach, the next iteration of the HRA will outline a commitment to ensure that cumulative numbers of qualifying bird species being affected will be monitored by Dover District Council.</p>
If wintering bird surveys are required to assess the cumulative impact of development, then all sites should be assessed at the same time, to assess what mitigation is appropriate for the Local Plan as a whole. If sites are found to be undeliverable due to bird populations then this should be known before Regulation 19. If individual sites cannot start construction until after a winter season has passed to enable the required survey to be made, delays may impact on the 5 year housing land supply. The Council should commission a comprehensive wintering bird survey next winter to properly inform the Regulation 19 document.		

Representations on Appendix 3

In total 28 representations were made on this appendix by 10 consultees.

Representations were received from:

Name	Agent / Organisation	Comment ID
Derek Leach	The Dover Society	DLP3067
Jane Cook	St Margaret's-at-Cliffe Parish Council	DLP1908
Robert Botwright		DLP2308
Rosie Rechter		DLP957
Alan Byrne	Historic England	DLP1674
Mr William Hickson	Savills – Hannah Haddad	DLP3569
Beat Hochstrasser	Elizabeth Welch	DLP1127
Sara Gomes	The Environment Agency	DLP1537, DLP1538, DLP1539, DLP1540, DLP1547
Kevin Bown	Highways England	DLP1819, DLP1820, DLP1762, DLP1781, DLP1782, DLP1785, DLP1792, DLP1793, DLP179, DLP1794, DLP1796, DLP1797, DLP1750
Barbara Cooper	Kent County Council	DLP1775, DLP1776, DLP1777
Elizabeth Welch	Hobbs Parker	DLP1127

Whole Plan Viability Study

Comment	Councils Response
Highways England has reviewed the transport and infrastructure section (8.40 – 8.42) and notes that the Council is assuming a cost of approximately £4,000/unit general development (for major units and excluding non-strategic sites) towards sustainable transport schemes. Refinement of the expected costings/unit are likely to arise through the Infrastructure Delivery Plan (IDP) and engagement with the promoters of potential Strategic Sites would result in schemes with an approximate £20,000/unit costings for Strategic sites (Para 10.16). These costings impact the percentage of affordable housing per development and residual value of the land. For example, for each £5,000/unit sought for developer contributions,	Comments noted. Council will refine details thought the IDP

<p>reduces the amount a landowner can pay for a parcel of land by about £175,000/ha. Where a 30% affordable housing requirement, it becomes problematic for developers to then bear significant contributions which are over/above £10,000/unit. The implications of this are that there is a balance to be had between prioritising affordable housing and infrastructure scheme collections. While Highways England would leave the finer details of the developer contributions to Dover Council to develop, consideration would need to be given to larger infrastructure schemes and their funding needs within the IDP. (DLP1762)</p>	
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Climate Change Topic Paper

Comment	Councils Response
<p>We note historical references to the Code for Sustainable Homes in paras 3.36- 3.38. Para 3.39 says "At the time of making the announcement to abolish the Code for Sustainable Homes, the Government were clear that elements of the code would be incorporated into changes to the Building Regulations. To date this has not happened." This is not up to date, as the requirements above in the Local Plan, and para 7.11 of this paper both show. (DLP1537)</p> <p>In Section 7.12, we would recommend mentioning the use of SuDS, ensuring that reference to the requirement of groundwater protection is included. (DLP1537)</p> <p>2.6 Topic Paper states: Hotter, drier summers may have adverse health impacts and may exacerbate the adverse environmental effects of air and water pollution. Even though the topic paper on climate change identified the potential for adverse environmental effects of water pollution, this has not been adequately addressed in the local plan. ((DLP1537)</p>	<p>Addressed in revisions to be made to the Climate Change chapter.</p>

Housing and Economic Land Availability Assessment (HELAA)

Comment	Councils Response
<p>Maps for "Dover, Whitfield, Guston & Tempe Ewell" are too small. (DLP3067)</p>	<p>Noted</p>
<p>Support for Land at Northbourne Road but feels that there may be justification to allocate the wider site and allocate 33 units (DLP3569)</p>	<p>Noted</p>

Infrastructure Topic Paper

Comments	Councils Response
<p>We would recommend including wastewater treatment capacity among the infrastructures needed to support future proposal for new homes. This is particularly important for Dover DC, given that the district relies fully on groundwater abstraction for drinking water supply, and that groundwater recourses are already at high risk of degradation.</p> <p>Topic Paper states: Southern Water has a statutory obligation to provide wastewater services to existing customers and planned new development. This is correct, however there is no mention of Southern Water having an obligation to protect the quality of the water environment due to the provisions of the Water framework Directive. This is the reason that when considering growth / new development, the impacts on water quality should be given consideration. The local plan needs to place a higher importance on water quality, which should be done through policies directed towards water quality. The Water Cycle Study correctly states that the water quality of the area does not achieve Good status. This is sufficient reason for placing more emphasis on protecting and enhancing the quality of water bodies in the area. (DLP1547)</p> <p>The County Council would request the inclusion of waste management within the Infrastructure Delivery Schedule. The County Council notes that the Infrastructure Topic Paper only mentions waste briefly. It is included as a category of physical infrastructure within section 3.11, but no further detail is provided in subsequent sections when all the other physical infrastructure categories are discussed. The County Council would welcome further engagement in respect of the waste needs to support sustainable growth. (DLP1775)</p> <p>Potential developments at Aylesham and Shepherdsweil have impacts for Network rail use, and there are large parts of Dover with low levels of car ownership and higher levels of unemployment that are dependent upon good public transport links.</p> <p>Inappropriately placed development without good sustainable and active transport links could exacerbate people's access to services, facilities, and employment (Para 4.12)</p>	<p>Wastewater will be addressed in Reg 19 Plan and IDP.</p> <p>Water Quality will be addressed in more detail in the Reg 19 plan.</p> <p>Waste Management will be addressed within Local Plan and IDP.</p> <p>Rail and other sustainable transport infrastructure needs will be reviewed as part of IDP</p>

Dover Economic Growth Strategy (2021)

Comment	Councils Response
<p>Highways England has focussed on the 'Infrastructure for Business' in reviewing this document and notes that promoting a mix of physical infrastructure, multi-modal transportation options digital infrastructure (such as broadband and connected network) with human capital (access to talent) demonstrates a willingness to look holistically at how transport can be used to benefit economic growth within Dover. One of the key target activities is to continue to support and lobby for the dualling for the A2 from Lydden to Dover Eastern Docks and improvements at Brenley Corner. As previously mentioned, Highways England will work with Dover Council to develop strategies that improve connections on the SRN in a safe, reliable manner that do not impact the day to day operation. (DLP1785)</p>	<p>Comments noted</p>

The Natural Environment Topic Paper

Comment	Councils Response
<p>Topic Paper States that DM Policies 15 and 16 are frequently used existing policies being retained however it seems that DM 16 has now been replaced by DM39. It is hoped that DM16 is still retained in some form? (DLP1908)</p> <p>Para 3.7 and the Evidence Base above para 5.16 refer to a Water Cycle Study dated 2009. This has surely been superseded by the 2020 version. (DLP1538)</p> <p>In the Water Quality section we would recommend including drinking water safeguard zones, nitrate vulnerable zones and the risks of degradation of groundwater resources. Although the Water Cycle Study identified that "small increases of in wastewater flows are expected across Dover, following development", the need of wastewater provision of new, and in certain cases, existing developments is paramount to deliver long term groundwater resources protection for drinking water purposes to ensure the water supply needs are met in the district. We believe this should be clarified in the document. (DLP1538)</p>	<p>Addressed in revisions to be made to the Environment / Climate Change chapter.</p>

<p>8.3 section - We would recommend to comment on the fact that, not only groundwater sources in Dover District are over-abstracted, but also they are at high risk of degradation, as identified by the numerous drinking water safeguard zones and nitrate vulnerable zones in the district. With regard to the point which summarised need of wastewater provision, we reiterate, as above that this provision of central in groundwater protection.</p> <p>Within SA 5, we would recommend specifying “surface and ground water”. (DLP1538)</p>	
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Open Space Report

Comment	Councils Response
<p>The 2019 Open Space Assessment Report identifies the site referred to as ‘off Mill Lane’ Eastry as one of the four lowest scoring amenity greenspaces sites in Dover. Referenced as No. 393 it scores 34.4% in terms of quality and 28.0% in terms of value. Given the low score the representation attached demonstrates how development could proceed on part of the site (avoiding any impact on the protected trees), whilst offering improvements to the remainder of the open space. It may also be possible to open up the remainder of the site to the public which could, in turn, provide connectivity to adjacent open space. (DLP1127)</p>	<p>Comments are noted. The assessment report does not recommend removal or changes to the open space designation based on the scoring. Site submissions will be assessed as part of the HELAA and SA.</p>

Water Cycle Study

Comments	Councils Response
<p>1.2, presents more recent figures for water consumption than those quoted above from the Kent Environment Strategy. Pleased to see this document presenting up-to-date information from the latest Water Resource Management Plans.</p> <p>4.20, Affinity Water's target consumption is for its whole supply area, and its Dour resource zone is already below the target for 2025. Other of its zones (north and west of London) have more unmetered customers and therefore higher consumption.</p> <p>5.20 suggests that the Council could "aspire to even more stringent standards" of water efficiency than the 110 litres</p>	<p>Comments will be reviewed and included in the updated Water Cycle Study</p>

standard. I would caution that under current Building Regulations it could not require such standards, it could only encourage them. The preferred options under para 7.3 are consistent with this. (DLP1540)

Section 7 of the report (Options and recommendations) the “Environmental focus” is centred on the use of SuDS, however we believe there should be a mention to the potential legacy of contamination which should be taken into account as essential part of the Water Cycle study, with the scope of achieving growth that is well-integrated, appropriately located and sustainable in the context of clean and safe water provision. Proposals for Sustainable Drainage systems involving infiltration must be assessed and discussed with the Environment Agency to determine their suitability in terms of the impact of any drainage into the groundwater aquifer. In the same section 7, with regard to the item focused on wastewater, the study identifies the need for adequate wastewater treatment facilities to be in place prior to new development and the need to phase developments to allow the wastewater treatment capacity to be the upgraded. We are in full agreement with this aspect and we would like to add a comment with regard to the need of increased suitable wastewater drainage cover (extension of existing network) and potentially promote the use of first sewerage to remove the load on area of high groundwater vulnerability. On this regard we would recommend to consider in the study the Drainage and Wastewater Management Plans (DWMPs) which the water companies have started drafting in line with Water UK guidelines, and the potential beneficial impact DWMPs might have on safe water provision for a sustainable development.

Heritage Strategy

Comment	Councils Response
Excludes external sources of heritage data (such as the Kent County Historic Environment Record and the National Heritage List for England.) (DLP1674)	The evidence base text/links will be amended to include Kent HER and NHLE.

Urban Archaeological Database Characterisation (DDC/KCC 2020)”

Comment	Councils Response
<p>The County Council welcomes the inclusion of this document in the evidence base for the Local Plan. The archaeological characterisation represents the most up-to-date attempt to tell the story of Dover’s development over time and assess the significance of this story and the heritage assets that underpin it. It will serve as a very useful tool for developers trying to assess the impact of their proposals and for planners who will draw upon it to inform their decision-making. It will also be of great interest to the community who may wish to learn more about the history of the town and the archaeological remains both beneath their feet and in some cases still visible in front of them. This is a once in a generation document of great importance.</p> <p>Please note, however, that on the District Council website, the reference to this document should be corrected to “An Archaeological Characterisation for Dover (KCC/DDC 2021)”. (DLP1776)</p>	<p>The evidence base text will be amended to the correct document title.</p>

PART D - Representations made on Omission Sites (Sites not proposed in the Local Plan)

Some representations received during regulation 18 were commenting on sites they considered to be an Omission (missing from) the Draft Local Plan or had comments on sites that formed part of other evidence base documents such as the HELAA. Informal comments on some sites were also made outside of the formal representation process but are relevant to the site assessment. All of these representations and comments are detailed within the table below.

Rep ID	HELAA Ref	Site address	Comments Summary	Additional Information submitted	Council Response
DLP2068	ASH006	Land off Sandwich Road, Ash	The representation notes that the previous Inspector's refusal on the site was in the context of DDC having a 5 year housing land supply, that the site is situated outside Confines, and that the previous proposal would have a negative impact on the character and appearance of the built and natural environment. The representation seeks to address these issues and submitted new proposals	Landscape Strategy	The HELAA 2020 identifies the site as being unsuitable. Having reviewed the information submitted that position remains unchanged. Furthermore, the adopted Ash Neighbourhood Plan 2021 sets out the proposed housing allocations for Ash and these have been agreed by an Inspector. Given this, the Local Plan will not seek to make housing allocations in Ash.
DLP1174	AYL005	Land off Holt Street, Snowdown, Aylesham	The representation provides additional information on the proposed use of the site in addition to an indicative masterplan.	Indicative Masterplan	Site has been re-assessed as part of the update to the HELAA based on the new information submitted.

Rep ID	HELAA Ref	Site address	Comments Summary	Additional Information submitted	Council Response
TC4S045	CAP001	Land adjacent to 101 New Dover Road	Representation made in support of the site at Regulation 18. Site was also submitted to the Targeted Call for Sites by the landowner. Notification received that a land agent has been appointed.	Site Location Plan	Site was assessed as unsuitable in the HELAA 2020. No evidence has been submitted to address the issues highlighted in the HELAA 2020 and therefore no change is proposed. The site continues to be unsuitable.
DLP2052	DEA012	Land between the A256 and North Deal	<p>Site references as Cottington Park. covers a reduced site area to the previous scheme considered and proposes:</p> <ul style="list-style-type: none"> - 975 new dwellings of which 30% will be affordable housing units -Self build housing - 2FE primary school - Cycle ways and pedestrian routes - New public open space covering approx 400 acres - A new facility for the Dover Outreach Centre - Links to Deal Town Centre - Low carbon development - Local convenience services - Job creation - Business space for SMEs - Sports facilities - the development will enable the re-location of Deal and Betteshanger Rugby Club to the site and enhance facilities at Deal Town Football Club - Sustainable transport connections incorporating electric busses and bikes - A fully independant drainage network 	<p>Flood risk mapping</p> <ul style="list-style-type: none"> - Vision document - Phase 1 Land Contamination Assessment - Landscape and Visual Appraisal - Ecological Constraints Assessment - Archaeological Assessment - Arboriculture Technical Note - Drainage Scoping Assessment - Transport Appraisal - Site Plans - Utility Searches 	Site has been re-assessed as part of the update to the HELAA based on the new information submitted. Site considered to be unsuitable.

Rep ID	HELAA Ref	Site address	Comments Summary	Additional Information submitted	Council Response
DLP1955	DEA023	Site south of, Marlborough Road, Deal	Site was also submitted through the Targeted Call for Sites. The representation advises that the site is currently designated as Open Space, however questions the value of the open space designation given that it is not publicly accessible. The representation (as a previous application on the site did) seeks to provide qualitative improvements to the provision of open space here, as part of the wider development of the site, in order to address the qualitative loss of open space.	Drainage Impact and Flood Risk Assessment Proposed Layout Plan	The site was previously eliminated from the HELAA as it is designated public open space. Outline application (20/00779) was refused despite an Officer recommendation for approval, and the Inspector dismissed the appeal, concluding that the identified deficiency of Open Space in the vicinity would outweigh the proposed qualitative improvements, and the appeal should not be allowed. No change is therefore proposed to the HELAA.
DLP1955	DEA046	Land lying north west of Cross Road, Walmer	A representation was made at Regulation 18 in support of the site and the site was also submitted through the Targeted Call for Sites. The representation advises that the site is currently designated as Open Space, however questions the value of the open space designation given that it is not publicly accessible. The representation (as a previous application on the site did) seeks to provide qualitative improvements to the provision of open space here, as part of the wider development of the site, in order to address the qualitative loss of open space. The promoter has also provided a Drainage Impact and Flood Risk Assessment in support of the site, as well as a proposed layout plan.	Drainage Impact and Flood Risk Assessment Proposed Layout Plan	The site was previously eliminated from the HELAA as it is designated public open space. The site was not within the KKP Open Space assessment but was recommended to be retained as open space in the OS Topic Paper, due to a quantity shortfall of amenity greenspace. Furthermore, an outline application (20/00779) was refused despite an Officer recommendation for approval, and the Inspector dismissed the appeal, concluding that the identified deficiency of Open Space in the vicinity would outweigh

Rep ID	HELAA Ref	Site address	Comments Summary	Additional Information submitted	Council Response
					the proposed qualitative improvements, and the appeal should not be allowed. No change is therefore proposed to the HELAA.
DLP1845	DOV001	Land to the right of Gordon Lodge at the top of Vale View Road	A representation was made at Regulation 18 in support of the site. Site is proposed for 23 units.	An Arboricultural Assessment, sketch of Potential Landscape Treatment, a note on Landscape and Visual Matters and a Transport Assessment were also submitted.	The information submitted has been reviewed and the TA was sent to KCC Highways for comment. Given the continued highway concerns and the fact that the site remains designated public open space, no change is proposed. The site remains unsuitable.

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DLP1221	DOV017	Dover Waterfront	Representation made in support of the site along with an updated Masterplan with revised housing numbers and employment/ retail floorspace.	Updated Strategic Plan	Existing Core Strategy allocation. Site assessed as suitable in the HELAA 2020. No change proposed to the HELAA. Site allocation policy will be updated in the Reg 19 Local Plan.
DLP1636	EAS007	Land east of Foxborough Hill, Eastry	Site is promoted for mixed-use development incl 6 dwellings (SBCH) and 3 buildings containing 8 industrial units for office and light industrial use (1000sqm employment space total).	Site Location and Existing Site Plan	Site was assessed as potentially suitable in the HELAA 2020.
DLP1510	EAS008	Gore Field, Gore Lane, Eastry	Representation received in support of this site at Regulation 18.	N/A	Site has planning permission and therefore will not be taken forward in the HELAA to avoid double counting.
DLP1612	EAS015	Land adjoining Walton Cottages, Woodnesborough Lane, Eastry	<p>The representation proposes:</p> <ul style="list-style-type: none"> -30 specialist older persons homes, with a developable area of 1ha on a 3ha site - It is proposed that this low density allows for open space provision and space for biodiversity, as well as keeping development away from the two listed buildings on site <p>The representation argues that the method for calculation of need for Specialist Older Persons Housing is out of date, having used the Strategic Housing for Older People (SHOP) tool which has since been decommissioned. The representation argues that Dover's need for specialist housing is much higher than the 642 units claimed, in the region of 3,586-3,905.</p>	N/A	The representation doesn't adequately address the issues raised in the HELAA 2020 and no further evidence is provided. Given that, the site remains unsuitable. The comments on Specialist Older Persons Housing Need will be responded to separately - see comments and council's response to comments on the Housing Chapter of the Local Plan.

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			The representation argues that the Council should produce a robust minimum figure for specialist housing for older people over the Plan period, and provides a suggested Policy example on Affordable Specialist Housing which may help to deliver units without compromising the overall objectives of the Plan		
DLP649	EYT002	Farm land behind and accessed from Adelaide Road	Representation made in support of the site at Regulation 18. Title deeds provided to confirm right of access to site from Adelaide Road.	N/A	The information submitted has been sent to KCC Highways who have commented that: 'The proposed number of properties will require a Full TA and Travel Plan and a secondary emergency access to the site will be required. A crossroad junction is not ideal although it is hoped that most people will walk to the local school and nearby amenities from this site so not many forward movements from the access would occur but the form of access will need further consideration based on the outputs of the TA'. Site has been re-assessed in the HELAA based on the information submitted and KCC comments. The site is now considered to be unsuitable.

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DLP1406	EYT016	Land to the rear of St Peter's and St Paul's Church, Church Hill, Eythorne	The representation questions why the site was found to be unsuitable on heritage grounds and argues that the site was dismissed erroneously on heritage grounds due to the presence of the listed St Peter & St Paul's Church, despite application 17/00246 having been permitted on land which is closer to the church, with no heritage objections raised on that application.	N/A	The site does appear closer to the listed Church than the application (17/00246) site, and the access to this site skirts the Church's graveyard. Sites are assessed on case by case basis. Despite the screening that is present, the heritage concerns remain and no evidence has been submitted to address the heritage issues raised in the HELAA 2020 report. Site remains unsuitable.
DLP3254	GUS001	Site between play area at Guston and Meadowcroft	A representation has been made in support of the site. Advises that the promoter is willing to be work flexibly with the Council on unit numbers and housing types to be delivered on site.	Detail to address highways concerns raised in the HELAA	The information submitted has been reviewed by KCC Highways. The site was assessed as potentially suitable in the HELAA 2020 and whilst additional information has been provided to address some of the issues identified, other concerns still remain. Given this, the site remains potentially suitable.

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DLP3110	LAN005	Land at Eastside Farm, The Street, East Langdon	<p>A representation was received in support of the site, including an Indicative Layout Plan and Transport Statement. Proposed on site is:</p> <ul style="list-style-type: none"> - 10 dwellings on land to the east of the existing Farm - A rerouted (within the site) access between properties <p>The representation also argues that while the site is outside Confines, the built environment of East Langdon extends to Eastside Farm, and accordingly development of this site would not be out of character</p>	Indicative Layout Plan and Transport Statement	<p>The representation was sent to KCC Highways for comment. View is that site is not sustainable with few village amenities and no footways to connect to bus services.</p> <p>Given this and the fact that no further evidence has been submitted to address the heritage concerns and landscape impact in relation to the site, the site is still considered to be unsuitable.</p>
DLP1411	NOR002	The Former Packhouse, The Drove, Northbourne	<p>Representation made in support of the site. Representation proposes a revised and scaled down scheme of 30 - 35 units to mitigate traffic impacts.</p>	Updated Masterplan	<p>The revised scheme has been sent to KCC Highways for comment. KCC have commented that:</p> <p>There are still concerns over the suitability of The Drove to serve a development of 30 homes as access into the site is constrained, with poor visibility. Links to public transport are poor and there is no footway provision within the village.</p> <p>Given the continued highway concerns, the assessment in the HELAA 2020 remains unchanged. Site is still potentially suitable.</p>

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DLP2060	NOR004	Home Farm at Little Betteshanger, Northbourne	Representation in support of the site, which addresses issues raised in the HELAA 2020. Site promoted for 10 self build units. Site promoter advises a planning application is being prepared for the site. Site also submitted as part of the targeted call for sites REF-TC4S084	N/A	Site was assessed as unsuitable in the HELAA 2020. The evidence submitted does not adequately address the issues highlighted in the HELAA 2020 and therefore no change is proposed. The site continues to be unsuitable.
DLP1408	PRE015	Harnden Farm, Stourmouth Road, Preston	Representation in support of the site, which addresses issues raised in the HELAA 2020. Site promoted for 6 units.	N/A	Site was assessed as unsuitable in the HELAA 2020. The evidence submitted does not adequately address the issues highlighted in the HELAA 2020 and therefore no change is proposed. The site continues to be unsuitable.
DLP513	RIN002	Land at Ringwould Alpines, Dover Road, Ringwould - site submitted 4 times by Lee Evans for B1, care home, holiday accommodation	<p>A representation has been received which questions the PDL status of land and states that it should be recorded as greenfield.</p> <p>A representation has also been received from the site promoter requesting that RIN002 and RIN004 should be allocated together to prevent RIN002 from becoming landlocked. The two sites combined have capacity for up to 41 dwellings</p>	N/A	The spreadsheets will be updated to show the site is greenfield. Site is identified as suitable in the HELAA 2020. No evidence has been submitted that would alter that assessment. No change proposed. Site will be reviewed when the proposed site allocations are updated for Regulation 19.

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TC4S046	SAN003	Land at Jubilee Road, Sandwich	Site submitted to Targeted Call for Sites where Housing team noted it as redundant. Intended to be developed for 100% affordable housing. However the site recently became an Asset of Community Value, and the grassland to the south of the site is designated as Open Space.	N/A	No action - site remains unsuitable. The building was listed as an asset of community value in June 2021. This does not mean the site would be sold to a community group, the sale of a site could be delayed by 6 months to allow a community group time to raise funds to buy the asset. The asset of community value listing can also be, at the Councils discretion a material consideration in refusing development of any planning application and in Plan making.
DLP2051	SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Representation provides further information in support of this HELAA site to demonstrate how the site could be developed in a way that would minimise harm to the scheduled monument on the site. An illustrative masterplan plan has also been provided. The representation details discussions that have been undertaken with Historic England who we understand have now removed their objection to the proposals. However we are yet to receive written confirmation of this. A Note on Archaeology has however been provided. With regards to flooding the site promoter states that the issues raised in the HELAA 2020 can be mitigated and has attached a Flood Risk Scoping Assessment for consideration.	N/A	Site has been re-assessed as part of the update to the HELAA based on the new information submitted. Site is now considered suitable.

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DLP1142	SAN009	Harp Meadow (Beers' Yard), land rear of 1 to 13 Woodnesborough Road, Sandwich	Representation received in support of the site, which responds to the issues raised in the HELAA 2020.	Intrusive Site Investigation Report submitted (dated 2015)	Site was assessed as unsuitable in the HELAA 2020. The evidence submitted does not adequately address the issues highlighted in the HELAA 2020 and therefore no change is proposed. The site continues to be unsuitable.
Made outside of formal process	SAN011	Discovery Park, Ramsgate Road, Sandwich	Representation requesting boundary edits to the polygon.	N/A	Polygon for the site has been updated.
DLP1625	SAN014	Land adjacent to Rope Walk, Whitefriars Meadow, Sandwich	Representation made in support of the site. Site promoter suggests that the site should be allocated in the Local Plan given its sustainable location. Submission refers to initial heritage feasibility assessment and flood risk assessment though these haven't been submitted with the rep.	N/A	Site was assessed as unsuitable in the HELAA 2020. The evidence submitted does not adequately address the issues highlighted in the HELAA 2020 and therefore no change is proposed. The site continues to be unsuitable.
Made outside of formal process	SHE013	Land around Coldred	Representation queries why site was deleted from the HELAA and asks that it be re-assessed. Site is promoted for 5 self build dwellings. A planning application has also been submitted.	N/A	Site has been re-assessed as part of the update to the HELAA based on the new information submitted. Site is now considered suitable.
DLP1615	SHE014	Land off Mill Lane (additional)	Site has been re-submitted for assessment as part of the Targeted Call for Sites - REF TC4S082. A	Indicative Layout Plan	Site has been re-submitted through the 2021 Targeted Call for Sites and

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			representation in support of the site has also been made.		will be assessed through that process REF - TC4S082.
DLP932	SHO001	Land at Churchfield Farm, Vicarage Lane, Sholden	Representation advises that the site has permission for a 64 bed care home and 48 residential units. The site promoter is considering a new application to remove the care home element from the previous permission, increasing the residential element from 48 to 100 units	N/A	Site has planning permission and therefore will not be taken forward in the HELAA to avoid double counting. If the site promoter wishes to amend the existing planning permission and apply for permission for a revised scheme, then that should be done in the usual way. No change required
Made outside of formal process	STA008	Mill Road, Staple - smaller site	Representation made to remove Reed Cottage from STA008 boundary.	N/A	Site area will be updated to exclude Reed Cottage
DLP1638	STM010	Land located between Salisbury Road and The Droveaway, St Margarets-at-Cliffe	Representation made in support of the site. Site is promoted for between 7 and 12 units. Site is confirmed as available. Site has also been submitted through Targeted Call for Sites (REF -TC4S073)	Submission also includes: Options for site layout, Land Registry Plan and an Access and Transport technical note.	The transport information provided with the submission has been sent to KCC Highways for comment. KCC have commented that: 'No clarification provided over rights of access over Salisbury Road which is private and as such not part of the adopted highway network. Access may be possible via the Droveaway, however there does appear to be a gap between the red line boundary and the adopted highway which will need to be clarified. This smaller scale

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					development is far less likely to cause traffic conflict issues (when compared to 78 dwellings) There may need to be some localised widening on The Driveway opposite the site which could have an impact on existing tree planting. Visibility at the junction of Salisbury Road/The Droeway is constrained, as such it access via The Droeway would be more appropriate'. The site has been re-assessed as part of the update to the HELAA. The site is now suitable.
Made outside of formal process	SUT005	The Homestead, Homestead Lane, East Studdal	Representation states that the whole site has erroneously been shown to have planning permission, when only the section fronting Homestead Lane has planning permission (19/01050).		Site has been re-submitted through the 2021 Targeted Call for Sites and will be assessed through that process REF - TC4S064.

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DLP2058	TIL003	Danefield House, St Mary's Grove, Tilmanstone	Representation made in support of this site and responds to the issues identified in the HELAA 2020. Site is promoted for 20 units.	Representation includes a Transport Technical Note, Access Arrangements and TRICS assessment.	The transport information provided as part of the representation has been shared with KCC Highways for comment. KCC have commented that: The Technical Note indicates access only from St Mary's Grove, rather than also from Dover Road as suggested in the accompanying letter. Appears suitable visibility may be achievable at some point along site frontage in St Mary's Grove. Existing road would also need widening up to Dover Road, or at least passing places provided. The measured speeds suggested have not been verified but in any case appear too high for imposition of a 30 mph speed limit, and it has also not been demonstrated that the other necessary criteria for a 30 mph limit have been met. As such there is concern regarding the lack the lack of visibility at the junction of St Mary's Grove with Dover Road. Unlikely on its own to have a severe capacity impact on the highway network. No footways serving site.

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					Given the continued highways concerns, the proposed loss of priority habitat on the site, and the fact the proposal wouldn't accord with SP3 given the size of the proposed development and the sustainability of the location, Tilmanstone being classed as a small village or hamlet in the settlement hierarchy, the existing HELAA 2020 assessment remains unchanged. The site continues to be unsuitable.
DLP1634	WAL001	Land off, Station Road, Walmer	Representation made concerning Land off Station Road Walmer. The site benefits from planning permission for 233 units. The site promoter confirms that the planning permission has now been implemented. The site promoter requests that the site be allocated to accommodate additional growth beyond that which has already been granted planning permission. The representation also requests that the site be included in the settlement confines.	N/A	Site has planning permission and therefore will not be taken forward in the HELAA to avoid double counting. If the site promoter wishes to amend the existing planning permission and apply for permission for a revised scheme, then that should be done in the usual way. No change required
Made outside of formal process	WAL006	Land off Dover Road, Walmer	Representation queries why the site isn't included as a proposed allocation in the draft Local Plan given it has planning consent. The representation also requests that the settlement confines should be re-drawn to include the site. A planning application for Reserved Matters is currently under consideration.	N/A	Site has planning permission and therefore will not be taken forward in the HELAA to avoid double counting. No change required

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DLP1920	WHI009	Land to rear of Archers Court Road, Whitfield	Representation made in support of the site to the Regulation 18 consultation. Representation acknowledges site already has consent for 28 units and that a new application is currently being considered by the LPA for 64 units. Information submitted includes: Land Registry Plan, Title plans, Site Location Plan, Tree and Topography plan, Indicative Location and Site plans.	N/A	Site has planning permission and therefore will not be taken forward in the HELAA. No change required
DLP1635	WIN006	Land at Broomhill, Gobery Hill, Wingham	Representation submitted in support of site. Site was refused planning permission on highways grounds and this is now being appealed. Site promoter has confirmed that the site remains suitable, available and achievable.	N/A	Site was assessed as potentially suitable in the HELAA 2020. No further evidence has been submitted that would alter that assessment.
Made outside of formal process	WOR001	Land to the rear of The Street	Representation to Regulation 18 consultation queries why site is included on both lists of the submitted sites and rejected sites. The representation also states that a larger area has been considered in the HELAA than that was submitted. The site promoter has submitted a plan for a smaller development area, that only covers the former greenhouses on the site, and proposes 5 units on this site.	N/A	Site was assessed as unsuitable in the HELAA 2020 given it is designated Local Green Space in the Worth Neighbourhood Plan 2015. Given this position hasn't changed, no change is required to the assessment. Site has also been submitted as part of the Targeted Call for Sites.
DLP2751	WOR007	Land to the rear of Jubilee Road, Worth	Representation objects to the inclusion of WOR006 and the omission of WOR007 as a proposed allocation in the Draft Local Plan.	N/A	Site has been re-assessed as part of the update to the HELAA. The development of this site would not be in accordance with Local Plan strategic growth plans. Site is considered to be unsuitable.

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DLP1252	Part of SHO002	Land South West of Sandwich Road, Sholden	Representations were made by the site promoter, Richborough Estates stating that the wider land which is under landowners' control is also suitable for development and should be included as part of larger allocation for 250 dwellings.	Vision Document, Highways Impact Assessment; Landscape and Visual Technical Note	Part of the site has planning permission for 110 units and will not be taken forward in the HELAA. The remainder of the site was previously assessed as unsuitable in the HELAA due to landscape and highways impact. The site has been re-assessed as a result of the new information and is still considered to be unsuitable due to landscape impact, potential coalescence with Great Mongeham and highways impact.

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