



Appendix F: Regulation 20 Representations Summary and Council Response

March 2023





Appendix F: Regulation 20 Representations Summary and Council Response

Table of Contents

Introduction 7

PART A: SUMMARY OF MAIN ISSUES RAISED 8

Summary of Main Issues 8

PART B: SUMMARIES OF REPRESENTATIONS AND COUNCIL RESPONSES 11

Local Plan Introduction 11

Vision And Objectives 14

Strategic Policies 17

Introduction to Strategic Policies..... 17

SP1: Planning for Climate Change..... 17

SP2: Planning for Healthy and Inclusive Communities 19

SP3: Housing Growth 20

SP4: Residential Windfall Development 29

SP5: Affordable Housing 31

SP6: Economic Growth..... 34

SP7: Retail and Town Centres 37

SP8: Dover Town Centre 39

SP9: Deal Town Centre..... 41

SP10: Sandwich Town Centre 41

SP11: Infrastructure and Developer Contributions 42

SP12 Strategic Transport Infrastructure 45

SP13: Protecting the District’s Hierarchy of Designated Environmental Sites and Biodiversity Assets 48

SP14: Enhancing Green Infrastructure and Biodiversity 51

SP15: Protecting the District’s Historic Environment 53

Housing and Employment Site Allocations 54

Introduction to Housing and Employment Site Allocations:..... 56

Dover Site Allocations 57

Introduction to Dover Site Allocations: 57

SAP1: Whitfield Urban Extension..... 58

SAP2: White Cliffs Business Park (phases 2, 3 and 4) Whitfield 60

SAP3: Dover Waterfront 61

SAP4: Dover Western Heights..... 62



SAP5: Fort Burgoyne, Dover..... 62

SAP6: Dover Mid Town 63

SAP7: Bench Street Dover 63

SAP8: Land Adjacent to the Gas Holder, Coombe Valley Road, Dover 64

SAP9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover..... 64

SAP10: Buckland Paper Mill, Crabble Hill Dover 65

SAP11: Westmount College, Folkestone Road, Dover 65

SAP12 Charlton Shopping Centre, High Street Dover 66

SAP13: Dover Small Housing Sites 66

Deal Site Allocations 67

Introduction To Deal Allocations: 67

SAP14: Land off Cross Road, Deal: 68

SAP15: Land at Rays Bottom, Walmer 68

SAP16: Deal Small Housing Sites 70

Sandwich Site Allocations 72

Introduction to Sandwich Site Allocations:..... 72

SAP17: Land South of Stonar Lake, Sandwich..... 74

SAP18: Sandwich Highway Depot 74

SAP19: Land at Poplar Meadow, Sandwich 75

SAP20: Wood’s Yard, rear of 17 Woodnesborough Road, Sandwich 76

SAP21: Land adjacent Sandwich Technology School, Deal Rd, Sandwich 77

SAP22: Land at Archers Low Farm, St Georges Road, Sandwich 80

SAP23: Sydney Nursery, Dover Road, Sandwich 81

Aylesham Site Allocations 82

Introduction to Aylesham Allocations: 82

SAP24: Land to the South of Aylesham..... 83

SAP25: Aylesham Development Area 86

SAP26: Former Snowdown Colliery, Aylesham..... 87

SAP27: Land at Dorman Avenue North, Aylesham (AYL001)..... 88

Local Centres: Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown, Eythorne and Elvington 89

Introduction to Local Centres: 89

Eythorne and Elvington Site Allocations 90

Introduction to Eythorne and Elvington: 90

SAP28: Land between Eythorne and Elvington:..... 90

SAP29: Land at South-Eastern side of Roman Way, Elvington 92



SAP30: Chapel Hill, Eythorne 93

Eastry Site Allocations 93

Introduction to Eastry: 93

SAP31: Statenborough Farm, Eastry 94

SAP32 Land at Buttsole Pond, Lower Street, Eastry 94

SAP33: Eastry Small Housing Sites 95

Kingsdown Site Allocations 96

Introduction to Kingsdown: 96

SAP34: Land at Woodhill Farm, Ringwould Road, Kingsdown 96

SAP35: Land adjacent to Courtlands, Kingsdown 98

Shepherdswell Site Allocations: 100

Introduction To Shepherdswell 100

SAP36: Land to the North and East of St Andrews Gardens, Shepherdswell 100

SAP37: Shepherdswell Small Housing Sites 102

St Margaret’s-at-Cliffe Site Allocations 104

Introduction to St Margarets -at-Cliffe 104

SAP38: Land adjacent to Reach Road, St Margaret’s-at-Cliffe: 104

SAP39: Land to the west of Townsend Farm Road, St Margaret’s-at-Cliffe: 105

SAP40: St Margaret’s-at-Cliffe Small Housing Sites 105

Wingham Site Allocations 109

Introduction to Wingham: 109

SAP41: Footpath Field, Wingham 109

SAP42: Wingham Small Housing Sites 109

Larger Villages: Caple-le-Ferne, Lydden, Preston, Worth, Alkham, East Langdon 110

Introduction To Larger Villages: 110

Alkham Site Allocations: 110

Introduction to Alkham 110

SAP43: Land at Short Lane, Alkham 111

Caple-le -Ferne Site Allocations: 112

Introduction to Capel-le-Ferne: 112

SAP44: Land to the east of Great Cauldham Farm, Capel-le-Ferne: 113

SAP45: Capel-le-Ferne Small Housing Sites 115

East Langdon Site Allocations: 120

Introduction to East Langdon: 120

SAP46 Land adjacent Langdon Court Bungalow, The Street, East Langdon: 120

Lydden Site Allocations: 122



Introduction to Lydden 122

SAP47 Land adjacent to Lydden Court Farm, Church Lane, Lydden 122

Preston Site Allocations: 124

Introduction to Preston: 124

SAP48 Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston 124

Worth Site Allocations 126

Introduction to Worth 126

SAP49 Worth Small Housing Sites:..... 126

Smaller Villages and Hamlets: Ringwould, Chillenden, Nonington, Woodnesborough, Staple, Coldred.
..... 129

Introduction to Smaller Villages and Hamlets Allocations..... 129

Introduction to Chillenden:..... 129

SAP50: Land adjacent to Short Street, Chillenden..... 129

SAP51: Land opposite the Conifers, Coldred 130

Introduction to Nonington:..... 130

SAP52: Prima Windows, Easole Street, Sandwich Road, Nonington 130

Introduction to Ringwould:..... 131

SAP53: Land at Ringwould Alpines, Ringwould..... 131

Introduction to Staple:..... 133

SAP54 Land at Durlock Road, Staple 133

Introduction to Woodnesborough:..... 133

SAP55: Woodnesborough Small Housing Sites..... 133

Development Management Policies 134

Introduction to Development Management Policies: 134

Climate Change 134

Policy CC1: Reducing Carbon Emissions..... 134

Policy CC2: Sustainable Design and Construction..... 136

Policy CC3: Renewable and Low Carbon Energy Development..... 137

Policy CC4: Water Efficiency 138

Policy CC5: Flood Risk 138

Policy CC6: Surface Water Management 139

Policy CC7: Coastal Change Management Areas 140

Policy CC8: Tree Planting and Protection..... 141

Place Making 142

Policy PM1: Achieving high quality design, place making and the provision of design codes 142

Policy PM2: Quality of Residential Accommodation 143



Policy PM3: Providing Open Space 144

Policy PM4: Sports Provision 145

Policy PM5: Protection of Open Space, Sports Facilities and Local Green Space..... 146

Policy PM6: Community Facilities and Services 147

New Homes 148

Policy H1: Type and Mix of Housing..... 148

Policy H2: Rural Local Needs Housing..... 149

Policy H3: Meeting the Needs of Gypsies and Travellers 150

Policy H4: Gypsy and traveller windfall accommodation 152

Policy H5: Self-build and Custom Housebuilding 152

Policy H6: Residential Extensions and Annexes 153

Policy H7: Houses in Multiple Occupation 153

Employment and the Local Economy 154

Policy E1: New Employment Development 154

Policy E2: Loss or Redevelopment of Employment Sites and Premises 155

Policy E3: Businesses Operating from a Residential Property 155

Policy E4: Tourist Accommodation and Attractions 156

Retail And Town Centres..... 157

Policy R1: Primary Shopping Areas 157

Policy R2: Sequential Test and Impact Assessment 158

Policy R3: Local Shops 158

Policy R4: Shop Fronts..... 159

Transport and Infrastructure 159

Policy TI1: Sustainable Transport and Travel 159

Policy TI2 - Transport Statements, Assessments and Travel Plans 160

Policy TI3: Parking Provision on new Development 162

Policy TI4: Overnight Lorry Parking Facilities 162

Policy TI5: Digital Technology 163

The Natural Environment..... 164

Policy NE1: Biodiversity Net Gain 164

Policy NE2: Landscape Character and the Kent Downs AONB..... 166

Policy NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy 167

Policy NE4: Air Quality 167

Policy NE5: Water Supply and Quality 168

Policy NE6: The River Dour 169

The Historic Environment 170



Policy HE1: Designated and Non-designated Heritage Assets.....	170
Policy HE2: Conservation Areas	171
Policy HE3: Archaeology	171
Policy HE4: Historic parks and gardens.....	172
Local Plan Appendices.....	173
Local Plan Appendix A: Evidence Base	173
Local Plan Appendix B: Local Plan Policies in relation to Neighbourhood Plans:	176
Local Plan Appendix C: Local Plan Monitoring Indicators:.....	176
Local Plan Appendix D: Housing Trajectory:	176
Local Plan Appendix E: Settlement Hierarchy.....	177
Local Plan Appendix F: Supporting Documents Required for Planning Applications	181
Local Plan Appendix G: Local Plan Site Allocations.....	181
PART C: ANNEXES.....	182
ANNEX 1: Group Representations	182
ANNEX 2: Omission Sites.....	182
ANNEX 3: Late Representations.....	187
ANNEX 4: Sustainability Appraisal Representations	188
ANNEX 5: Habitat Regulations Representations	202

Introduction

- i Appendix F provides a summary of the representations received pursuant to Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- ii Part A sets out the number of representations made, together with a summary of the main issues raised in the representations, in accordance with the requirements of Regulation 22 (1) (c) (v).
- iii Part B provides a summary of representations received in Plan order, with a brief summary of the Council's response to issues raised. Where an additional modification to update or clarify issues is proposed a cross-reference to the Schedule of Additional Modifications is included.
- iv Part C contains five Annexes to this Appendix which address group representations received (Annex 1), representations which propose omission sites (Annex 2), late representations which arrived after the expiry of the Public Consultation period (Annex 3), representations received on the Sustainability Appraisal (Annex 4) and representations received on the Habitats Regulation Assessment (Annex 5).

PART A: SUMMARY OF MAIN ISSUES RAISED

Number of Representations Made

- 1.1 Public Consultation on the Dover District Council Local Plan (Regulation 19 – Submission Version) ran from 8am 21st October to 5pm on 9th December 2022. During this period **1,928** representations were made from **586** representors.
- 1.2 Of the total representations received, 8 were group representations totalling 1,706 signatories. These are set out in Annex 1.
- 1.3 59 representations proposed 55 alternative or additional sites to those that have been selected for allocation in this Local Plan. These Omission Sites are listed in Annex 2. The representation number is also identified here to indicate against which policy the representation was made.
- 1.4 Three representations proposed Local Green Spaces/Open Spaces. These are listed in Annex 2.
- 1.5 A small number of representations were received after the closing date. Those that were made by post were deemed duly made due to the postal strikes that took place during the months of November and December 2022. Those that were received by email were deemed inadmissible. These are listed in Annex 3.
- 1.6 Of the total 1,928 representations received, almost half (47%) were made on the Site Allocations Policies of the Plan, approximately 20% on both the Strategic Policies and the Development Management Policies of the Plan, with the remainder made against the introductory sections, the Appendices and the Evidence base.

Summary of Main Issues

Housing Strategy

Housing Growth (Policy SP3)

- 1.7 **Housing Requirement** – whether the housing requirement is too high or too low. Representations express the view that the housing requirement should be increased. Concern has been raised that economic growth assumptions have not been factored in and that the buffer should be increased due to over-reliance on strategic sites delivery. Several representations express the view that the housing requirement should be decreased following the announcement by government that the housing targets are not mandatory, and due to the impact that additional housing has on the local area, the amount of greenfield land required to deliver the target and insufficient infrastructure provision.

- 1.8 **Housing Supply** – Concern raised about the over reliance on large strategic sites in the housing supply, and the delivery potential and rate of the Whitfield Urban Expansion (SAP1) is questioned. Suggesting further smaller sites in the rural areas should be identified.
- 1.9 **Distribution of housing allocations** – disagreement regarding the appropriateness of the spatial strategy. Contrary views expressed in relation to the balance between development at Dover/Whitfield and the rural settlements. A number of representations suggest further development is needed in the most deliverable (rural) areas of the District, on the contrary concern is raised that the amount of development in the rural area is too high. Several representations suggest that the amount of development in Deal and Sandwich (as District and Rural Centres) should be greater.
- 1.10 **Gypsy and Traveller Accommodation** – insufficient sites allocated and the actual need is higher than the GTAA states. (Policies H3 and H4)
- 1.11 **Windfall housing** - Concern raised about the flexibility of approach allowing development outside of settlement boundaries, and on the contrary that the policy is too restrictive. (Residential Windfall Development –Policy SP4)
- 1.12 **Affordable Housing** - Several objections stating the viability evidence is weak and it is not justified to exclude Dover Urban Area from the affordable housing requirement. (Affordable Housing –Policy SP5)

Specific Housing Site Allocations

- 1.13 *Representations were received on all but one (SAP31) of the allocations proposed in the Plan. Those considered to raise main issues are:*
- SAP1 (Whitfield Urban Expansion) – objections to the requirement to update the SPD/masterplan for the site, and to take account of changing policy requirements.
 - SAP15 (Land at Rays Bottom, Walmer – WAL002) – significant objections from residents, raising a range of issues.
 - SAP16 (Bridleway Riding School, Station Road, Deal - TC4A008) – concern raised regarding loss of sport use (riding school).
 - SAP19 (Land at Poplar Meadow, Adjacent to Delfbridge House) – whether the site is available for housing given representations regarding potential use of site for retail.
 - SAP21 (Land adjacent to Sandwich Technology School – SAN013) – whether there is justification to safeguard part of site for education use and not sports use.
 - SAP22 (Land at Archers Low Farm, St George’s Road, Sandwich – SAN023) – significant objection from residents. Recent appeal decision refused development at site due to landscape impact along Sandown Road.
 - SAP24 (Land to the South of Aylesham – AYL003) – representations raised regarding relationship with emerging Canterbury Local Plan, scale and related impacts of development in Aylesham, including impact on surrounding road network.
 - SAP28 (Land between Eythorne and Elvington – EYT003/EYT009/EYT012) – Scale of development in Elvington/Eythorne (which are separate Local Centres but located in close proximity) in relation to access to and impacts upon services and infrastructure.
 - SAP34 (Land at Woodhill Farm, Kingsdown – KIN002) – Impact of site on landscape and setting of AONB and potential capacity of site.
 - SAP36 (Land to the North and East of St Andrews Gardens, Shepherdswell – SHE004 & TC4S082) – significant number of representations raising objection regarding impact on local road network, local infrastructure, and loss of green space.
 - SAP40 (Land located between Salisbury Road and The Droveaway, St Margaret’s-at-Cliffe - STM010) – significant number of representations raising objection regarding the suitability

of the site with reference amongst other issues to impact on the Dover to Kingsdown Cliffs SAC, the Kent Downs AONB and the Heritage Coast

- SAP44 (Land to the east of Great Cauldham Farm, Capel-le-Ferne – CAP006) and SAP45 – Capel-le-Ferne Small Housing Sites - significant number of representations raising objection about highway impact and scale of development in Capel. In addition, representations raise concern about the impact of CAP011 (Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne) due to the impact upon the AONB.
- SAP50 (Land adjacent to Short Street, Chillenden – GOO006) – site is subject to surface water flooding

Transport and Infrastructure provision and delivery

- 1.14 A significant number of representations express concern about lack of or deficiencies in existing infrastructure provision, including local road networks, GP surgeries, primary and secondary schools and bus services. (Site specific policies and Infrastructure and Developer Contributions – Policy SP11)
- 1.15 The delivery of upgrades to the Strategic Road Network are critical to the delivery of the Local Plan. Other upgrades are also required to the Local Road Network. The Statement of Common Ground with National Highways and Kent County Council Highways and Transportation sets out how issues raised in representations have been addressed and what further work is to be completed. (Strategic Transport Infrastructure –Policy SP12)

Employment and Local Economy

- 1.16 Representations that Employment Land should be identified and allocated in Deal. (Economic Growth –Policy SP6)

Climate change and Environment

- 1.17 **Climate change mitigation:** Several representations raise concern that the Local Plan policies do not go far enough in mitigating climate change, and the Plan should be requiring more than the minimum Buildings Regulations standards, by requiring net zero standards, Future Homes Standard now, and/or carbon offsetting requirements. (Planning for Climate Change – Policy SP1 and Reducing Carbon Emissions – Policy CC1)



PART B: SUMMARIES OF REPRESENTATIONS AND COUNCIL RESPONSES

Representations are presented in Local Plan order. Issues are summarised and a brief Council response is noted. Where a factual update or clarification is proposed, cross reference is made to

‘SD06 - Schedule of Additional Modifications’ submitted alongside this Statement.

Representations received on the Sustainability Appraisal (SA) and the Habitat Regulations Assessment (HRA) are summarised in Annexes 4 and 5.

Local Plan Introduction

49 Representations have been received from the following consultees:

5 Sue Ward	1233 Esquire Developments
11 Martin Brandon	1303 James Kenyon
16 Peter Jull	1306 Marine Management Organisation
94 Christopher Shilling	1307 Canterbury City Council
126 Mandy Gass	1328 Patricia Smith
371 William Ratchford	1428 National Grid
517 Sharon Danby	1439,1441, 1724, 1728 Walmer Town Council
541, 1050 Dover and Deal Green Party	1451 Tunbridge Wells Borough Council
662 Mr Robert Hogben	1458 Environment Agency
667 Rhona Kyle	1535 Adisham Parish Council
693 Deal Town Council	1612 Ringwould with Kingsdown Parish Council
702,710 Dr John Garcia-Rodriguez	1619 D C King
809 Dr Nagy Rafla	1639 Tilmanstone Parish Council
810 Lorna Biggs	1653 Alkham Parish Council
908 Kent County Council	1762 Dennis Hill
944 Hawarden Farming (Judith Hawarden)	1770, 1774, 1775 Mari Jones
1152 National Highways Kevin Bown	1787 Rosemary Rechter
1167 Woodchurch Property Ltd	2009 Denise Bottle
1169 Historic England	2016 Mr Paul Dawkins
1192 Gladman Developments	2038 Karen Phillips
1203 James Blomfield	2040 David Reid

Support

Representations 1303, 1307, 1428 and 1454 support the Plan. Representations 908, 1152, 1169, 1458, 1535, 1619, 1639 and 1653 support the Plan conditional on a number of issues and amendments to specific parts of the Local Plan.

Issue: Document Structure and Accessibility:

- Local Plan Policies should be more robust, tighter definitions with less room for argument (11, 662)
- Local Plan document is too large and needs to be broken down into a more readable document (1724)
- Colour choices in the document are difficult to read.

Issue: Engagement and Duty to Cooperate:

- Plan has not been advertised sufficiently and there should have been more time to respond (126, 1770, 1774)
- Making a comment on the Regulation 19 Local Plan is too complicated. Especially in terms of the portal, making group representations and the legal terminology (517, 126, 541,662, 667, 693, 1328, 1612, 1762, 2038)
- Plan fails on duty to cooperate owing to lack of engagement with site promoters (809)
- DDC has not full consulted with statutory consultees including KCC (1203)
- Would like to see evidence of Regulation 18 Engagement. (810)

Response

The Regulation 19 Consultation on the Dover District Submission Local Plan was carried out in accordance with the Town and County Planning Regulations (Regulations 18 and 19) and the adopted Statement of Community Involvement (SCI), for a 7 week period. A number of resources were created and made available by the Council to assist consultees in navigating the document and the online portal and in clarifying legal terminology which were available throughout that time period. There were posters, social media posts, adverts, exhibitions and direct invitations to participate where requests had been made. More information on the advertising of the consultation, engagement methods and guidance which was provided for residents and other interested parties can be found in the Part 2 Regulation 22 Consultation Statement (of which this is an appendix).

Information regarding the consultation on the earlier Regulation 18 Consultation can be found in Part 1 of the Regulation 22 Consultation Statement, which was published as a background document to the Regulation 19 consultation.

With regards to the Duty to Cooperate the Council has met the requirements as set out in the Duty to Cooperate Statement and Statements of Common Ground with individual organisations. The Duty to Cooperate does not apply to Town and Parish Councils, however it is considered that consultation in accordance with the Statement of Community Involvement has taken place with these bodies, as set out in the Regulation 22 consultation statements Part 1 and Part 2.

Issue: overarching policy comments:

- Plan doesn't do enough to achieve the Climate Emergency Target of net zero Target by 2015 as declared by the council. (517,662)
- Not enough protection for agricultural land, land that provides flooding defence, the Natural Environment and The Historic Environment. More emphasis should be on building on brownfield sites. (571, 662)
- Infrastructure cannot keep up with the pace of development. (517, 662)
- Following the December 2022 announcement mandatory housing targets are no longer being imposed. (517)
- The Regulation 19 submission document refers to the "pre application process" which excludes the public. This should be changed to improve transparency. (1439)
- Amend paragraph 1.15 to add the Marine Management Organisation to list of agencies with which the Council engages. (1306)



Response:

Once adopted the Local Plan is a legal document that needs to cover a large number of planning related issues in detail to ensure that policies can be accurately implemented. Reducing the size of the document could affect the quality of the content. The document meets accessibility requirements and other formats are available on request.

Specific policy related matters are responded to in this Summary Report against the relevant areas of the Plan. Policy wording needs to be carefully wording and sufficiently flexible to ensure it applies to all types of development and scenarios.

Additional Modification AM2 adds the Marine Management Organisation to list of agencies with which the Council engages in paragraph 1.15.

Monitoring and Review

- No mention of how the Local Plan will be enforced (1728)
- Plan is no longer compliant since Canterbury City Council released their Regulation 18 document with inclusion of the Adisham Plans. This needs joint planning. (16, 702, 710)

Response:

As set out in this section of the Local Plan, the policies and implementation/effectiveness of them will be reviewed annually through the Authority Monitoring Report. A number of indicators are included within Appendix c which set out how this monitoring will be undertaken.

As explained in the Duty to Cooperate Statement and accompanying Statement of Common Ground (SoCG) with Canterbury City Council, both Councils have continued to liaise on matters of plan making, and have made representations on relevant Local Plan consultations. In response to the CCC representation relating to the Aylesham development on this Local Plan, a modification has been proposed (See AM51) which is agreed with CCC in an updated SoCG March 2023.

Key Characteristics of Dover District

- Concern raised relating to expansion at Whitfield, including impacts on character and the town centre, noting that the district is a net exporter of labour and travel to jobs outside the district is unsustainable (5)

Response:

Representations on the Whitfield Urban Expansion are addressed in the responses to SAP1.

Key Issues for the Local Plan

- The plan does not meet the stated goal of mitigating climate change. Building in and around Shepherdsweil (and other villages) will result in a large number of additional journeys by car. (94)
- Lack of research and presentation about the role of farming - employment, food production, carbon capture (994)
- The Local Planning Authority is powered by developer interests, planning processes should be overseen by public officials without any conflicts of interest (1050)
- The councils' previous actions are not compatible with the key issues listed on page 18. (1441)



- An omitted key issue is the development of digital infrastructure as this is insufficient in parts of the district. (1775)

Response:

Policies SP1 and CC1 – CC8 provide clear policy guidance to ensure that the new development necessary in the District over the plan period contributes to the mitigation of, and the adaption to, the harmful impacts of our rapidly changing climate. The plan and the site selection process were subject to a rigorous sustainability appraisal where policies and sites are assessed against a series of sustainability criteria. These include (SA5) that the Plan prioritises the remediation and development of poorer quality brownfield land over greenfield land and poorer agricultural land over the district’s best and most versatile agricultural land. The Local Plan has been approved by full council as well as being created with the involvement of the Planning Advisory Group (PAG) which is made up of elected public officials. The Key issues listed in the Local Plan submission document are the issues the Council aspires to resolve within the Local Plan period 2020-2040. Policy TI5 and the Infrastructure Development Plan outlines the plans to improve digital technology throughout the district.

Vision And Objectives

32 Representations have been received from the following consultees:

37, 61 Sue Ward	1170 Historic England
137 Christopher Shilling	1205 Gladman Developments
216 Tina Matcham	1255 Dean Lewis Estates
227,234, 327, 328, 329 Kent Wildlife Trust	1335, 1336, 1337 The Land Trust
367 Susan Sullivan – Friends of Betteshanger	1388 Lee Evans on behalf of Mr & Mrs Laflin and Rubix Estates
450, 451 Sharon Danby	1414 Mr and Mrs Tobin
544, 1049 Dover and Deal Green Party	1438, 1440, 1442, 1443 John Lonsdale on behalf of Walmer Town Council
554 Dover Harbour Board	1628 Mr Colin and Linda Tearle
898 Caroline Raffan	2000 Martin Garside
912, 914 Kent County Council	

Overarching Vision

Support

Representations 216, 554, 1170, 1255, 1388 and 1628 support the overarching vision of the Plan. 1414 supports the vision and objectives but wishes for an amendment to the Plan to include the omission site promoted.

Issue: General Comments:

- Object to the Plan’s sustainability credentials, with worsening effects of climate change, building on agricultural land, pollution, loss of tourism, lack of housing for young people, need to retrofit existing homes, protection of rural communities and proper planning for infrastructure (450).
- Doubt that the vision and objectives will be met by the Strategic, Site Allocations and Development Management policies (1438, 1442).

Response:

Comments noted.

Spectacular and Sustainable Environment

- Support the inclusion of biodiversity and net gain in the vision but requests examples of how and when the district will reach net zero carbon as well as details of how the natural environment will be enhanced in urban areas as well as rural (227)
- Object to a permission and current live applications which would result in the removal of turtle doves from sites (367)

Response:

Comments noted.

Thriving Places

Support

- Representations 912 and 1335 support the heritage references and the references to Dover town centre sensitive restoration and improved connections with investment in high quality design and place making respectively, in the Vision.

Issue:

- Objects to the Vision as the expansion of Whitfield will destroy the district's rural and historic nature and further harm Dover town centre, reducing food production and biodiversity, and remove PROWs rather than enhancing them (37)

Response:

Comments Noted.

Strategic Objectives

Support

Representations 554, 1170, 1205, 1255, 1388 and 1628 support the Strategic Objectives of the Plan.

Issue: General Comments:

- Object to new housebuilding due to the embedded carbon in new homes, and homes should be retrofitted instead with Future Homes Standard insisted upon. Flooding is also a concern (451)
- Doubt that the strategic objectives will be met by the Strategic, Site Allocations and Development Management policies and question the integrity of the Council in terms of conflicts of interest. (1442)
- Object on the basis that the Plan misses the main housing challenges faced by the South East, and the opportunity to revitalise the town of Dover, with too much reliance on building on greenfield land (2000)

Response:

Comments noted.

Spectacular and Sustainable Environment

- The Plan will not meet the aims for its environment by building extra houses in Shepherdsweil (1370)
- Urge the council to 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. (227)



- Recommends using nature-based solutions to help tackle the climate emergency and for flood management, also supporting habitat connectivity (234)

Prosperous Economy

- Encourage the inclusion of sustainable tourism with inclusive and accessible tourist opportunities (327)

Vibrant Communities

- Nature is linked to better health, reduced levels of chronic stress and obesity and better concentration, so high quality green infrastructure should be at the heart of creating vibrant communities (328)
- Lack of accountability in pre-app discussions. Doubt in the Plan's ability to deliver equitably distributed prosperity (544, 1438)

Thriving Places

Support

Representation 1335 appreciates the objective to conserve and enhance heritage assets in a manner appropriate to their significance

Issues:

- Object to the lack of mention for horse riders when connectivity is discussed (61)
- Supports the inclusion of improving the health and wellbeing of residents, however this should be linked with nature and the benefits of daily contact with it (329)
- Heritage assets, including the form of the pattern of tracks, lanes and field boundaries, should be integrated into masterplans for the new villages (943)

Response:

Comments noted.

Additional Modification AM3 adds clarification to paragraph 2.2 that ecological connectivity should create a coherent ecological network, as well as deliver a net gain in biodiversity.

Key Diagram

Support

1337 welcomes the identification of Fort Burgoyne on the Key Diagram.

Issue:

- 1049 and 1440 request that the Kearsney rail line is added to the key diagram

Response:

Kearsney rail line is on the Key Diagram.



Strategic Policies

Introduction to Strategic Policies

3 representations have been received from the following consultees:

297, 348 Kent Wildlife Trust	365 Mark Norcliffe
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Support

Representation 297 supports DDC in its declaration of a climate emergency and carbon neutral and zero carbon emitter targets, noting that a Climate Change Strategy and Action Plan will be essential to reduce emissions and increase absorption, but the proposed policies are not felt to be sufficient to achieve carbon neutrality in the district.

Issues:

- Should be a focus on providing for connection with nature in all policies relating to health and communities (348)
- Object to contradiction between the aims stated in the vision and objectives and the provisions of the strategic policies (365)

Response:

Comments noted. Policies SP1 and CC1 set out the Plan's response to the challenges of the climate emergency.

SP1: Planning for Climate Change

22 Representations have been received from the following consultees:

153 Aylesham Parish Council	1059 Robert Hogben
215 Marion Gourlay	1171 Historic England
298 Kent Wildlife Trust	1182 Andy Beeching
415 Sharon Danby	1189 Rosalind Beeching
601 CPRE Kent	1206 Gladman Developments Ltd
649 The Woodland Trust	1274 Church Commissioners
684 Deal Town Council	1346 David Powell
708 John Garcia-Rodriguez	1444 Walmer Town Council
739 Terence Hopper	1592 Sandwich Town Council
916 Kent County Council	1643 Tilmanstone Parish Council
1051 Dover and Deal Green Party	1776 Mairi Jones

Support

Representations 649, 916, 1171, 1206, and 1346 find this policy sound.

Issue: Policy not ambitious enough

- Disappointed Council doesn't use its powers under Planning and Energy Act 2008 to set energy efficiency standards above the minimum Building Regulations requirements for new homes. Plan should be more ambitious (1643, 1059)
- FHS should be delivered in full now (153)

- Suggest alternative wording, from Plymouth and South Devon Joint Local Plan 2019 (415, 1051, 1444)
- Policy should include reference to UK legally binding target of net zero by 2050 (684)
- Policy should also require mitigation and adaptation to apply to existing buildings when they come under the planning system as planning applications. (1592)
- Policy should include a target for in/offsetting residual carbon (298)

Response:

Legally binding target of net zero by 2050 is a national policy and is referenced in paragraph 3.7. It is considered that this Policy as submitted represents a sound approach to delivering significant meaningful reductions in emissions across this District, within the context of also needing to demonstrate whole Plan viability.

Issue: Inconsistency with spatial strategy of the Plan

- Allocations on greenfield sites and use of Garden Village concept will result in increased car travel in conflict with the aims of this policy. Spatial strategy should focus development on towns. (215, 601, 708, 739)
- Transport and Land Use policies should demonstrate integrated approach (298)

Response:

The spatial strategy of this Local Plan seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (in terms of both viability and delivery) greenfield sites have had to be identified to meet the District's housing needs and ensure a continuous supply of housing across the plan period.

Other issues:

- References to Kent and Medway Energy and Low Emissions Strategy and Kent Environment Strategy should be added (916)
- Policy should incorporate use of nature-based solutions such as green roofs (298)
- Include wording in support of tree planting and woodland creation (649)
- Need to provide clarification as to what constitutes “qualifying development” and what a Climate Change Statement should contain (1274)
- General comments on Alkham Valley (1776)
- Site specific comments on SAP50 (1182, 1189)

Response:

References to Kent and Medway Energy and Low Emissions Strategy and Kent Environment Strategy are already included in paragraph 3.10. Nature based solutions to adapting to climate change are addressed in Policy CC2, support for tree planting and woodland in Policy CC8. Development covered by the requirement to be supported by a Climate Change Statement is all new built development as set out in paragraph 3.14. Additional modification proposed to paragraph 3.15 to clarify what a Climate Change Statement should contain.

Additional Modification AM5 adds clarification to paragraph 3.15 as to what a Climate Change Statement should address.

SP2: Planning for Healthy and Inclusive Communities

13 representations have been received from the following consultees:

38 Sue Ward	740 Terence Hopper
138 Christopher Shilling	919 Kent County Council
299 Kent Wildlife Trust	1052 Dover and Deal Green Party
307 Sport England	1347 Lander Planning on behalf of David Powell
452 Sharon Danby	1445 Walmer Town Council
593 John Townsend	1792 Mairi Jones
711 John Garcia-Rodriguez	

Support

Representations 307, 1347 support this policy

Issues:

- Lack of mention of PROW, cycling and horse riding in the Plan. (711, 740 and 1792) asks for more attention to be given to paths and cycle routes along the Alkham Valley Road as a recreational resource with infrastructure such as crossings provided. 711 objects on the ground that Aylesham and Elvington are not well-served communities and 740 objects to the centralising of employment, education and leisure facilities resulting in more car travel
- More housing in Shepherdswell will worsen air pollution and pedestrian safety on Church Hill. All developments will worsen air quality (452 and 593)
- Policy should make provision for protecting the natural environment and biodiversity with varied natural areas as nature is important for human health and wellbeing (299)
- The large homes are not needed, small manageable homes are needed and more green spaces
- The Plan does nothing to replace or transform housing in deprived wards to become future proofed or zero carbon homes, leaving people in outdated unhealthy housing and trapped in food and fuel poverty by rising rents
- Alter policy wording to say “education, health and social care” at criteria 1 (919)

Response:

Travel via non-car methods is addressed in Policy T11 and PROW and cycling connections referred to where relevant in site policies. Policy NE4 establishes requirements on all development proposals that might lead to significant deterioration in air quality to submit Air Quality Assessments in accordance with relevant guidance and the DEFRA Emissions Factor Toolkit and requires that all major development should demonstrate a shift to the use of sustainable low emission transport in accordance with policy T11. Evidence on housing types required is underpinned by the Council’s SHMA.

Additional Modification AM6 adds reference to social care to criterion 1 and spaces for biodiversity and nature to criterion 9.



SP3: Housing Growth

97 representations have been received from the following consultees:

12 Martin Brandon	742 Terence Hopper
119 Vince Croud	827 Harris Lamb
131 Sue Ward	841 Plainview Planning Ltd
154, 174 Aylesham Parish Council	829 Womenswold Parish Council
333 Vanessa Broughton	858 Matthew Cook
278, 499 Dover and Deal Liberal Democrats	863 Leanne Turner
300 Kent Wildlife Trust	884 Martin Garside
416, 956 Sharon Danby	948 Town and Country Housing
558 Dover Harbour Board	765, 1003 Kitewood Estates
585 Emmanuel College	700 Catesby Estates
886 Persimmon Homes	819, 1006 Northbourne Estate
602, 971 CPRE Kent	1062, 1284 Robert Hogben
718 Richborough Estates Ltd	1017 Danescroft and Pentland Homes
921 Kent County Council	1150 Beat Hochstrasser
976 Langdon Parish Council	1187 Rosalind Beeching
1016 Alison Heine	1159 Lance Austin
1010 Chris Graham	1204 Esquire Developments
1056 Dover and Deal Green Party	1256 Dean Lewis Estates
1168 Woodchurch Property Ltd	1297 Eythorne Parish Council
1179 Andy Beeching	1309 Fernham Homes Ltd and Walker Residential Ltd
1186, 1190 Alex Child Villiers	1317 Womenswold Residents
1193 James Blomfield	1329 Rebekah Bates
1207 Gladman Developments Ltd	1384 Jan Gray
1267 Church Commissioners	1446, 1729 Walmer Town Council
1295, 1304, 1860, 1918, 1925, 1930 Quinn Estates	1425 Jill Cliff
1299 Fernham Homes	1433 Jane Marsden, Andrew Mollart and Sarah Wells
1310 Canterbury City Council	1519 Easton Builders
1326 William Hickson	1527 Hume Planning on behalf of Dover District Council
1348, 1349 David Powell	1566 Hume Planning on behalf of Kent County Council
1390 Mr P and Mrs S Laffin and Rubix Estates	1588, 1607 Sunningdale House Ltd
1415 Mr and Mrs Tobin	1630 Mr Colin and Linda Tearle
1431 Home Builders Federation (HBF)	1699 Guy Osborne
1468 George Jenkins	1852 Ramac Holdings
1521 Guy Van Petegem	1884 Rosemary Anne Holmes
1523 Kavanagh Motor Services Ltd	1911 Andrew Street
1569 Kentish Projects	1938 Jill Jones
1659 Alkham Parish Council	1961 Pearl Thorne
1721 Mr K Ledger	1891, 1893 David Wilson Homes
1773 Mairi Jones	1875 Mr and Mrs Armitage
	1906, 1909 Mrs J Jarvis

Number of homes being planned for:

Support

Representations 154, 1310, 1532, 1527, 1566, 1569, 1588, 1607, 1630, 1519, 1521, 1433, 827, 1390, 1630, 1349, 1415 – supports policy in terms of number of homes the plan is seeking to meet.

Representation 921 supports commitment to resist development that cannot be supported by necessary infrastructure.

Issues:

12, 131, 278, 416, 1062, 1190, 1056, 1425, 1446, 956, 1468, 1187, 1179, 1284, 1329, 1062, 1329, 1961 consider the number of homes being planned for should be lower, citing the following:

- 12 – exceptional circumstances should be argued to reduce housing requirement – pandemic, economic and cost of living crisis
- 131 – Dover is a net exporter of labour, there are insufficient jobs to support the new homes
- 416, 1190, 1056, 1446, 956, 1468, 1187, 1179, 1284, 1329, 1062 – Number of homes should be re-assessed following governments announcement that housing targets are not mandatory
- 12, 1329 –lack of infrastructure and impact upon local communities
- 1329 – water stress
- 12, 278, 1961 - Traffic and transport
- 131, 1425, 1062, 1961 – loss of agricultural land and capacity to supply food
- 131, 416, 1056, 1446 – raise issues in relation to climate change carbon emissions of new homes and building on farmland reduces capacity to sequester carbon
- 416 - Unacceptable impacts upon heritage and landscape
- 416, 1056, 1446, 1184, 1875 – underestimates the evidence that a large proportion of population growth is due to an aging population
- 1425, 1961 – loss of habitats

700, 718, 841, 1003, 1207, 1267, 1431, 1891 consider the number of homes being planned for should be higher, citing the following reasons:

- 718, 1431 – no evidence that the number of homes would support the level of economic growth proposed.
- 700, 718, 841, 1003, 1006, 1207, 1267, 1431, 1860, 1891 – an increase buffer on the housing supply should be provided (minimum of 10% and 20% suggested), to much reliance on Whitfield Urban Expansion.
- 841 and 1431, 1891 suggest additional small sites should be identified to deliver early, due to heavy reliance upon Whitfield Urban Expansion.

Response:

The number of homes being planned for meets the requirements of national policy to plan for the housing needs of the District, calculated using the standard methodology. There are not considered to be any adverse impacts (that cannot be mitigated) to justify meeting less than the standard methodology.



The government announcement that housing targets are not mandatory has not been put into policy. The additional reasons set out in the consultation on a revised NPPF that could justify a reduction from the standard methodology are not considered to be applicable to Dover District.

There is no requirement in national policy to provide a buffer on the housing target. The buffer is sufficient to ensure the housing target can be met. The supply of sites provides a continuous sufficient supply across the plan period as set out in the housing trajectory, and in the short term, as shown by the five-year housing land supply position.

The assumptions regarding the Whitfield Urban Expansion (WUE) delivery are reasonable and realistic (see Housing Topic Paper Update 2023). Whitfield Urban Expansion is the most sustainable location for significant growth in the District, and providing further sites in the less sustainable locations, requiring further greenfield land would result in a less sustainable pattern of development that is not necessary to meet the housing needs of the District.

Strategy for distribution of housing – General Comments

Support

Representations 416, 765, 827, 1056, 1168, 1299, 1309, 1362, 1390, 1433, 1446, 1917 support the strategy, including for the following reasons:

- 416, 1056, 1446 support para 3.29
- 1390, 1433 supports apportionment of growth taking account of hierarchy
- 1309, 1168 support strategy to allocate sustainable and accessible sites adjacent to existing urban areas/settlements
- 558 – supports the strategy which seeks to focus development where it supports regeneration and makes best use of brownfield land

General:

Representation 971 supports a development strategy with brownfield first, sustainable communities, rural housing where there is a local need, development in locations supported by public transport and facilities.

Issues:

- 11, 1062, 1193 – object to extending existing settlements which impacts upon sense of place and makes it difficult to plan for infrastructure
- 1326 – market signals should be considered and more sites allocated within the rural areas to support this
- 1056 – unlikely new housing at villages will help retain services such as public transport, retail and schools
- 1721 – Plan has not considered potential for new settlement in the Dover-Deal corridor
- 1891 – Strategy should be re-considered to identify more small/medium scale sites due to issue of delivery of strategic sites (Whitfield)
- 602 – Continuation of previous strategy does not meet vision. Settlement hierarchy has been set aside, strategy is not sustainable
- 718 – Spatial option C scores significant positive in twice as many categories as any other option and should be pursued. Sites away from Dover more deliverable (viable)
- 718 – Towns should have been included in hierarchy to understand greater sustainability credentials of them, in particular Deal



- 1006 – Spatial distribution should be revisited to direct more housing to the rural areas. Unsustainable with majority of housing in Dover, Whitfield, Sandwich and Aylesham
- 1006 – Settlement hierarchy is a blunt tool with notable imbalances. For example Worth 25 homes, Nonington 35 homes and Capel more than worth even though it has access to SRN and is a sustainable location.

Response:

The Council considers the strategy promotes a sustainable and appropriate pattern of development, taking into account the reasonable alternatives. The strategy is deliverable and will need the housing needs of the area. The strategy aligns growth and infrastructure and makes effective use of land in urban areas.

Strategy for distribution of housing – Location Specific:

Support:

- 416, 1056, 1446 – Support increase in no. of sites in Dover Town
- 1017 – supports delivery of Whitfield Urban Expansion, as most sustainable and reliable source of strategic scale growth for the Plan Period
- 1390 – support for level of growth proposed at Deal
- 700, 1309, 1852 – supports level of growth in Sandwich
- 1527 – support housing growth alongside community facilities and local convenience store that will enhance the sustainability credentials of the settlements. Settlements well served by existing facilities. Proposal will also enhance cycle and footpath linkages and bus services to surrounding area.
- 1348, 764, 1630 – supports levels of growth at Local Centre settlements (St Margarets and Kingsdown specifically) growth at St Margaret’s at Cliffe and Kingsdown
- 1415 – supports level of growth at smaller villages

Object:

Whitfield

Need to provide better facilities and transport links to reduce car dependency (416). Traffic impact to Alkham Valley Road unacceptable (1659)

Deal

416, 1056, 1446, 1961 concerns about traffic congestion and lack of infrastructure

886, 1299, 1918, 1925 more development should be proposed in Deal and site capacities should be maximised

Sandwich

742, 1309, 1891 – more development should be proposed in Sandwich, there is more suitable land and sites should be maximised

Aylesham

154 - Aylesham has contributed significantly to housing growth over recent years and future growth should be kept to a minimum

174 - Aylesham and Sandwich have equal weighting in the settlement hierarchy identified as 'rural service centres' but are not receiving equal weighting in terms of housing development and investment. Population of Aylesham now likely to be more than Sandwich. Aylesham must receive equal investment in comparison to other rural services centres to ensure it thrives, including investment in cultural capital.

829 – Proposals in combination with those proposed in the Canterbury Plan will have unacceptable impacts

829, 1317, 419, 1446 –A number of representations raise concern about lack of infrastructure including water, sewerage, secondary school, doctors, shops, public transport (bus and train)

829 - Insufficient parking at stations with no footways

829, 1317 – Impacts on rural road network

829, 1317 – Greenfield site, loss of farmland

1256, 1193 – Aylesham is a highly sustainable location that can support more development

Elvington and Eythorne

119, 858 - no benefits to combining the communities. Individual village status/heritage will be lost.

602 – The settlements should not have been put together to make a combined local centre. There is poor connectivity between the 2 settlements.

119, 858, 863 - Insufficient services and facilities, including lack of GP, school places, hospital, dentist and policing.

119, 858, 863, 602, 416, 1446 - No bus service/poor public transport

858, 863, 1297 – Raise concern about loss of habitat, agricultural land and green space between settlements

858, 1297 – impact on landscape and views from surrounding properties

858, 863 – Roads unable to cope

1446 – existing sewerage system cannot cope

863 – housing not affordable to local people

119 - employment allocation must provide jobs for local people

1297 – no assessment of the actual needs of the area has been carried out to ensure sympathy to and protection of the area. New development will have significant negative effects for a lifetime.

Ash

1893 – Local Plan should assess and consider sites in Ash to meet housing and employment needs of the District

Kingsdown

1010 – questions growth at Kingsdown as there is no public transport or jobs/services in the village

956 – designation of Kingsdown as a local centre is not justified

Shepherdswell – cannot accommodate large scale development



East Langdon

976 – growth at East Langdon not justified due to lack of services and scale of existing settlement

Capel-le-Ferne

1193 – scale of growth at Capel-le-Ferne is not supported due to lack of services and unsustainable location, impact on local road network, no transport modelling been carried out

Ringwould

1304 – sites at designated settlement should be optimised such as at Ringwould

Alkham

1773 – development needed for the parish to grow, more young families needed balanced against conservation and environmental constraints.

Response:

Growth at individual settlements has been informed by the overall spatial strategy, where possible, to locate the majority of development in locations which have access to a range of services and facilities, informed by the Settlement Hierarchy evidence. This has also been influenced by site availability and suitability, environmental constraints, and factors of delivery. A balanced approach has been taken to the scale of development proposed in the rural settlements of the District, with the level of housing proposed being proportionate to their access to services and facilities, as well as taking account of other constraints.

In terms of issues raised regarding infrastructure, it is accepted that new development proposals and increases in population may affect existing infrastructure and local services and may require new provision or enhancement to provision to meet their needs.

Therefore, all relevant service providers including (but not limited to) KCC (Highways, Education, Public Transport, health, waste, social and community teams), the NHS, rail, bus, water and utility companies and internal DDC departments for open spaces, sports and play are consulted at all stages of the plan making process to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate additional development.

If additional capacity is needed, this is then planned for through the Local Plan process and outlined the Infrastructure Delivery Plan (IDP), which supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required.

The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions through the developer obligation process (as set out in Policy SP11). Where the providers have raised concerns with specific local infrastructure, these have been addressed within the specific site policies. DDC will continue to work with these stakeholders in understanding the districts infrastructure needs and update the IDP as the position changes.

In relation to concerns regarding the highway network, as part of the Local Plan preparation, all potential sites were assessed to determine their specific impacts and potential cumulative effects on the road network. Where it is considered that mitigation was required (in consultation with Kent Highways), this is identified within site specific policies and the Infrastructure Delivery Plan (IDP) which supports the Local Plan.



Where the impacts of development were considered to be 'severe' and there were no deliverable options for mitigation, sites were considered unacceptable. As part of a planning application, developers will need to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable transport options. This will need to address issues identified in the Local Plan policies and the IDP. KCC Highways will review this and determine whether the traffic generated from a scheme creates an issue that requires resolution through the provision of local road and/or footpath and cycle path improvements. If off-site improvements are needed, then the developer may enter into a separate legal agreement with KCC Highways.

Additional Modification AM9 clarifies that the Plan does not propose that the villages of Eythorne and Elvington become a single Local Centre.

Land supply including Five Year Housing Land Supply

Support:

1390, 1630 – support the proposed 5YHLS position
1309, 1299 – supports the assumptions in the housing trajectory

Issues:

416, 1056, 1446 – should not provide additional sites given the baseline position of 6.03 years as will create destructive suburbanisation of a rural district

585, 700, 1003, 1006, 1295, 1267, 1523, 1566, 1569, 1468, 1588, 1607, 1519, 1521, 1256, 1699, 1911, 1930, 1925, 1918 – over reliant on growth on strategic sites at Whitfield and Aylesham. Additional suitable sites should be identified for short term delivery

1304 – not all sites identified will come forward in plan period, seek to optimise development land at designated settlements

718 - Table 3.2 supply figure is different to Appendix D trajectory, and different again to 5YHLS position

Response:

The supply of sites provides a continuous sufficient supply across the plan period as set out in the Housing Trajectory, and in the short term, as shown by the five-year housing land supply position. A buffer is provided on the five-year supply as well as the Plan's housing requirement to account for sites that may not come forward.

The assumptions regarding the Whitfield Urban Expansion (WUE) delivery are reasonable and realistic (see Housing Topic Paper Update 2023). Whitfield Urban Expansion is the most sustainable location for significant growth in the District, and providing further sites in the less sustainable locations, requiring further greenfield land would result in a less sustainable pattern of development that is not necessary to meet the housing needs of the District.

The Table 3.2 supply figure is different to Appendix D trajectory, as the Appendix D trajectory is the plan period trajectory and includes the non-implementation discount applied to extant permissions across the plan period. The non-implementation discount is not applied for the purposes of the five year housing land supply calculation, as the extant consents meet the definition of deliverable for the purposes of five year housing land supply.



Additional Modification AM8 to paragraph 3.40 and Table 3.2 to make clear that the Council does not wish to confirm its 5 Year Housing Land Supply through the Local Plan Examination and therefore the buffer is changed to 5%.

Balance of brownfield/greenfield land

Issues:

12, 416, 1297, 1056, 1317, 1446, 1384, 1062, 884, 131, 1425, 863, 858, 416, 884, 1729, 1961, 1938, 1906, 1909 – priority should be given to brownfield land and too many homes are proposed on greenfield sites

1295 – brownfield sites should be optimised to provide best use of land

602 – the Council should do more to unlock brownfield sites

Response:

The housing growth strategy seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (viability and delivery) greenfield sites have had to be identified to meet the District's housing needs and ensure a continuous supply of housing across the plan period.

Small Site Quota

Issues:

948 – large sites should be split into smaller parcels to enable SME's and RP's to develop

1204 – When built out brownfield register sites are removed, the Council does not meet 10% of its housing supply on sites under 1ha

Response:

Some site allocations in the Local Plan are made up of multiple smaller sites in separate ownerships and which would be able to come forward as separate phases.

The Council considers it does meet the small and medium sites 10% housing supply requirement. An update to the data has been provided within the Housing Topic Paper 2023 and an additional modification is proposed to reflect this, see below.

Additional Modification AM9 updates paragraph 3.52 confirming that the Council meets this 10% supply requirement.

Windfall Allowance:

Issues:

700, 1003 – relying on past delivery is not justified due to change in policy proposed in SP4 which will restrict future delivery

Response:

Policy SP4 is less restrictive than current Policy DM1, the reliance on past delivery is therefore considered to provide robust evidence.



Non-implementation Discount:

Issues:

718 – not justified at 5% only using data from 4 years. Should be increased to 20%

Type of Homes:

Issues:

154 – more homes need to be provided for disabled people and the number of dwellings built to accessible standard should be increased

1884, 1875 – Social housing and not more 4/5 bed houses should be planned for

1431 – Limited reference to provision for older person's housing to meet the needs identified in the SHMA. Policy supporting standalone proposals for homes for older people should be included in the Plan.

Response:

Policy H1 and Policy PM2 already address the issues of housing mix to meet identified need, accessibility standards, and older persons housing. Strategic Housing sites SAP1, SAP24 and SAP28 are all required to provide for older persons housing as part of the housing mix.

Development Viability:

Issue:

718 – Whole Plan Viability study has not been updated despite increase in labour, materials and interest rates since it was produced.

Response:

A recent review of the Whole Plan Viability Study was carried out in August 2022. There is therefore no further need for the study to be updated at this stage.

Gypsy and Traveller Provision:

Issue:

1016 – GTAA is out of date and insufficient pitches have been identified. Policy needs to reflect Lisa Smith judgement issued Oct 2022 and revisions to planning definition in PPTS.

Response:

The Plan seeks to meet the cultural and PPTS needs in accordance with the judgement. The GTAA is not considered to be out of date. The Council has sought to identify as many sites as possible to meet the need. Even if specific sites were identified to meet the full need, windfall proposals would still come forward. See Housing Topic Paper Update 2023.

General comments

Issues:

300 – policy makes no reference to biodiversity.

333 – better brownfield and sites without restrictions available including Betteshanger (DOV/20/0041)

416 – insufficient supply of affordable homes available due to number of holiday and second homes



Response:

Biodiversity is covered by other policies in the Plan. The Betteshanger site referred to is included in the extant supply.

Request for specific wording changes to policy

Issues:

1527 – requests change to SP3 to incorporate Elvington and Eythorne proposals for 300 homes as part of the strategy

1630 – to clarify what proportionate means

718 – Table 3.1 to be provided by settlement hierarchy locations

Response:

Comments noted.

Additional Modification AM10 clarifies the role of the villages of Elvington and Eythorne in the strategic approach to housing in the rural areas of the district.

Site-specific issues

The following responses make comments on site specifics which are summarised and responded to under the specific sites:

1159 – SAP15 (WAL002)

1150 – Open space in Eastry see 951, 1153 and 181

1186 and 1190 – SAP 32 (EAS002)

Miscellaneous

Issues:

499 comments in relation the net zero, improvements to transport network and cycle lanes.

Response:

Addressed in responses to relevant sections of the Plan.

SP4: Residential Windfall Development

29 Representations have been received from the following consultees:

17 Peter Jull	1290 Persimmon Homes South East
252 Kent Downs AONB Unit	1300 Fernham Homes Ltd
405 Kevin Holyer	1313 Fernham Homes Ltd and Walker Residential Ltd
455 Sharon Danby	1342 Amy Beaney
603 CPRE Kent	1416 Mr and Mrs Tobin
663 Talina Wells	1464 Walmer Town Council
722 John Garcia-Rodriguez	1469 George Jenkins
751 Langdon Parish Council	1640 Tilmanstone Parish Council
796 Esquire Developments	1733 Quinn Estates Ltd
893 Alexa Childs	1743 Martin Sturge



922 Kent Council Council	1861 Quinn Estates Ltd
958 Sharon Danby	1876 Tony and Valerie Armitage
1208 Gladman Developments Ltd	1882 Rosemary Ann Holmes
1248 Kent Planning Consultancy	1892 Barrett David Wilson Homes
1275 Church Commissioners	

Support

Representations 252, 922, 1290, 1300, 1313, 1469 and 1733 find this policy sound. Representation 455 agrees with criteria b), c), h), i) and j) of this policy.

Issue: Changes to Settlement Boundaries

- Changes requested to the settlement boundaries of Woodnesborough, Preston and Finglesham respectively (1416, 1743, 1342)
- SP4 should provide greater flexibility for windfall development in all locations and each site should be judged on its own merits (1275).
- Policy should be amended to allow for exceptional cases of minor residential development at smaller specified settlements where local housing need cannot be delivered within settlement boundaries (1861)
- Policy should state that existing settlement boundaries will be respected until agreed with town and parish councils in accordance with the principles of the Localism Act 2011 (958,1464,1876 and 1882)
- Brownfield land outside of settlement boundaries should be deemed to fall within settlements (248)
- All existing built development, as well as site allocations, should be included within settlement boundaries (796)

Response:

Town and Parish Councils were directly involved in the setting of the confines of settlements (as set out in Part 1 of the Regulation 22 Statement). The Council considers the settlement boundaries as shown on the Proposals Map, and as agreed with town and parish councils as part of the preparation of this Plan, to be sound.

Other comments noted.

Additional Modification AM11 clarifies the settlement boundary review procedure and the role of settlement boundaries in the determination of planning applications over the lifetime of the Plan.

Issue: Categorisation of settlements

- 455 does not agree with Kingsdown’s categorisation as a Local Centre
- 722 disagrees with the classification of Aylesham as a Rural Service Centre
- 751 does not agree with East Langdon being categorised as a large Village
- 1861 objects to the fact that not all settlements are listed in the policy

Response:

The methodology for the categorisation of settlements within the District, for the purposes of Policy SP4, is set out in the Rural Settlement Hierarchy Topic Paper which forms part of the Evidence Base



for this Plan. The Council considers this approach to be sound and does not consider that amendments to the Hierarchy are required.

As noted in the footnotes to this Policy, due to their geographical proximity with the urban area of Dover, River, Temple Ewell and Whitfield are deemed to form part of Dover for the purposes of this study only. Likewise, the settlements of Sholden and Walmer are considered, for the purposes of this Study only, as falling within the urban area of Deal. These settlements are therefore not included in this survey. In addition, only those settlements that had at least one of the sustainability indicator facilities surveyed were subsequently included in the Hierarchy.

Other Issues:

- Concerned about the effectiveness of this policy and that use of the phrase ‘commensurate with the scale of’ could give rise to large windfall development in Dover and Deal (17).
- Is windfall development now needed following the recent government announcements (455)
- Over-reliance on windfall in the Plan, how do the proposed allocation at Eythorne and Elvington comply with criteria b) and how is BMV agricultural land is defined (603)
- Plan 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 its objectives (1892)
- Object to the lack of mention of Tilmanstone in the Plan (1640)
- Object to the non-allocation of a site in Chillenden (405)
- Threshold for windfall development should be higher in Conservation Areas (663)

Response:

It is considered that the criteria of the Policy provide clarity on the issue of scale. Government announcements of November 2022 do not reflect the legislative and regulatory context in which this Plan has been developed. Allocation SAP28 at Eythorne and Elvington is one of the strategic allocations in this Plan and the requirements of Policy SP4 are therefore not applicable. The approach to meeting the housing need of the district is set out in Policy SP3. Tilmanstone is mentioned in the second tier of this Policy. Representation 405 is considered against the Chillenden section of the Plan. Criterion e of this policy requires windfall development to preserve or enhance heritage assets, which include Conservation Areas, thus setting an additional requirement for Conservation Areas.

SP5: Affordable Housing

23 Representations have been received from the following consultees:

80 Town and Country Housing	1269 Savills on behalf of Church Commissioners
253 Kent Downs AONB Unit	1296 Icen Projects on behalf of Quinn Estates
457 Sharon Danby	1350 Lander Planning on behalf of David Powell
559 Savills on behalf of Dover Harbour Board	1405 Lee Evans on behalf of Mr P & Mrs S Laflin & Rubix Estates
604 CPRE Kent	1417 Lee Evans on behalf of Mr and Mrs Tobin
782 McCarthy Stone	1436 Home Builders Federation
789 Langdon Parish Council	1474 Walmer Town Council
923 Kent County Council	1538 Adisham Parish Council
949 Dover and Deal Liberal Democrats	1594 Sandwich Town Council
1057 Dover and Deal Green Party	1631 Rubix Estates on behalf of Mr Colin and Linda Tearle



1063 Robert Hogben	1856 Planning Issues on behalf of Churchill Retirement Living
1210 Gladman Developments	

Support

- Representations 1210, 1405, 1538 and 1631 support this policy. Representation 604 supports the policy overall but believes that the Council should ensure commuted sums are spent in District. Representation 923 supports the policy overall but suggests that policy should be clear about balance needed with other infrastructure needs, such as highway mitigation. Representations 1417, 1856 welcome the flexibility of criterion 3. 1856 proposes additional point to be added to note that if any other suitable alternative as may be agreed with the Council, taking account of site specific circumstances.

Response:

Support and comments noted. Policy application allows for flexibility and assessment on case-by-case basis using independently assessed viability studies. Specific site requirements and balance of overall requirement vs site specifics or other infrastructure requirements will be assessed at time of planning application.

Issue: Thresholds

- Support requirement for policy to apply to 6 or more homes in designated rural areas (253)
- Designated rural areas settlements should be specifically listed (1350)
- Lower allowance should be made for lower provision in lower value areas (1436)
- All sites owned by public bodies should meet higher requirement of 50% (1594)

Response:

Support and comments noted. A footnote which lists the Designated Rural Areas is included within implementation section of policy, along with a list of settlements in 3.91. Specific requirements for lower value areas requiring lower provision are not supported by the Local Plan viability evidence and the policy already allows for viability case to be submitted. Public ownership sites are able to provide higher than 30% if they wish to, but cannot be required to by policy.

Issue: Exclusion of Dover Urban Area

- Several objections state that the viability evidence is weak / not justified to exclude Dover Urban area from AH requirement and policy unsound on that basis (80, 457, 949, 1057, 1474)
- Policy should be amended to include requirement that sites of 8 or more in Deal area only be permitted if applicant has delivered AH on other schemes in Dover urban area (1057)
- Support the exclusion of Dover Town area from policy (559, 604, 1856)

Response:

This nil position for Dover Urban Area is based on the evidence provided within the viability study and updates which support this Local Plan. This does not prevent affordable housing providers from delivering affordable housing schemes within the Dover Urban Area where they are viable, and this is explained within supporting text. Specific requirements for Deal/ Walmer area as suggested are not supported by evidence.



Issue: Tenure mix

- SP5 (2) should be clearer that social rented is preferable to Affordable rented because there is higher grant funding. Affordable home ownership and shared ownership have option to convert to intermediate rent to home buy (80)
- Increase in social rented, zero carbon publicly owned homes are most needed (457, 1057, 1474)
- The policy should enable neighbourhood planning areas to amend the affordability mix subject to any Local Housing Needs Assessment at the neighbourhood level. (789)
- First Homes should not be at expense of rented housing and are not affordable. Para 3.85 needs to be clearer with regards to local connections / key workers/ income cap requirements. (80)

Response:

Tenure mix proposed in policy is in accordance with national policy and local evidence such as SHMA and First Homes position statement. Site specific Affordable Housing provision will be assessed on a case-by-case basis at planning application stage, taking into account location of site, latest evidence of need such as local needs surveys and advice from housing department. The policy also allows for viability case to be submitted and changes in tenure mix (a) would be the first assessment made, as explained in supporting text.

Issue: Older Persons Housing and Brownfield Site Exemption

- Not justified to apply policy to older persons housing schemes, as not in accordance with evidence base or NPPF (782)
- Extra care and sheltered housing for older people should be removed as they often come forward on brownfield sites (1436)
- Specialist older persons and brownfield/urban sites should have nil rate (1856)

Response:

The majority of brownfield sites allocated are in the Dover Urban area. The policy allows for viability case to be submitted for other brownfield sites elsewhere in the district. Evidence and national policy supports the requirement that all C3 use (Dwellinghouses) should be required to meet the Affordable housing policy.

Additional Modification AM14 clarifies the requirements of SP5 in relation to C2 use/older persons/ specialist housing schemes.

Issue: Delivery of Affordable Housing

- Not enough Affordable Housing has been provided (1063, 1269)
- Increasing housing requirement / buffer / allocating other sites would increase delivery of Affordable Housing (1269, 1294)
- Management/Estate charges should be apportioned on a floor area and not on a unit basis (80)
- 100% affordable projects should be prioritised and supported through the local plan. (80)
- Large sites should be broken into smaller parcels to allow Small and Medium Enterprises and Registered Providers to develop (80)



Response:

Comments are noted.

SP6: Economic Growth

17 Representations have been received from the following consultees:

301 Kent Wildlife Trust	1476 Walmer Town Council
458 Sharon Danby	1614 Sandwich Town Council
560 Dover Harbour Board (agent Savills)	1862 1934 Quinn Estates
750 Terence Hopper	1877 Mr and Mrs Armitage
802 Langdon Parish Council	1885 Rosemary Anne Holmes
1058 Dover and Deal Green Party	1053 Dover Harbour Board (Strutt and Parker)
1311 Canterbury City Council	1268 Church Commissioners
1338 The Land Trust (Agent Bloomfields)	

Support

Representations 1311 and 1338 support this Policy.

Issue: Criteria 1 Discovery Park

- Support the allocation of Discovery Park, but a favourable status for ‘Sandwich Industrial Estate’ and ‘Ramsgate Road’ should be sought (1614).

Response:

‘Sandwich Industrial Estate’ and ‘Ramsgate Road’ are existing employment sites listed in Table 8.1 which follows Policy E2. The relevant planning tool for Discovery Park is an existing Local Development Order (Discovery Park Enterprise Zone). This is why Discovery Park does not have its own policy.

Issue: Criteria 2 Fort Burgoyne

- Concerned about the inclusion of Fort Burgoyne – a hibernation site for hundreds or thousands of bats and therefore could have a significantly detrimental effect on the local bat population (301).

Response:

Criteria ‘j’ of Policy SAP5 clearly states that that detrimental impacts on biodiversity will not be permitted. Criteria ‘f’ provides more detail to ensure biodiversity impacts are addressed. All bat species are protected, and any survey and mitigation activities will require a licence from Natural England.

Issue: Criteria 2 Dover Waterfront

- Support the allocation of Dover Waterfront but considers the estimated floorspace in Table 3.5 to understate development potential and deliverable floorspace. This should be amended to read 10,000sqm rather than 2350sqm (560).

Response:

Table 3.5 does not seek to establish an upper limit or target for employment floorspace at Dover Waterfront. Please refer to Policy SAP3 which establishes the requirement for a mix of uses.



Development should have regard to SP8. New employment development at Dover Waterfront can exceed the floorspace listed in Table 3.5 provided it satisfies the criteria in Policy SAP3.

Issue: Criteria 5 Port Facilities

- Support criteria 5 which supports the expansion of port facilities (560).
- Port activities can have a wide impact and on highways in particular and the provision of an inland terminal and lorry parking would assist to remove HGV's from the highway and relieve pressure on the port and the A20. Amendments to Policy TI4 to include an area of search for a co-joined inland terminal and lorry park (1053).

Response:

Comment noted. See response to Policy TI4.

Issue: Employment Development at Deal

- Object to a failure to positively plan for commercial development in and around Deal (1862)

Response:

Comment noted. Paragraph 3.119 addresses this issue.

Issue: Employment Development in Villages

- An economic use should be incorporated in villages to reduce out-commuting / pressure on roads (802).

Response:

Comment noted: Policy E1 seeks to support new employment development at designated settlements and in the countryside subject to appropriate location, scale and design. The plan has sought to reach a balance between the needs and aspirations of rural businesses and enterprise and the need to foster sustainable patterns of the development.

Issue: Green Economic Growth

- There is no mention of green economic growth / opportunities for climate friendly recovery sectors. 'Quality' of growth is more important than 'quantity' of growth. This is a more resilient economy (458, 1058, 1476,1877, 1885)
- Upgrading rented stock to zero-homes standard will create jobs for local trades people (458).
- Public Works Loan Board or municipal loans could be used in Dover as in East Sussex, where they've invested in skilled jobs transforming existing homes into zero carbon homes across seven district councils (458, 1058, 1456).
- A third sector would include fitting and maintenance of renewable energy installations (458, 1058, 1476).
- Policy does not do enough to grow a climate friendly sustainable economy (1058).

Response:

The Council's Economic Growth Strategy sets out in detail the Council's plans to grow the local economy.

Additional Modification AM15 adds reference to green growth matters in the Council's Economic Development Strategy.



Issue: Educational Attainment and Incubation of New Business:

- Forge deeper links with Further Education Institutions given skills gap to Green Homes agenda (458, 1058).
- Encourage higher education establishments to develop facilities in the District (458, 1058).

Response:

Comments noted. Paragraph 3.123 states that the council will support higher education providers to encourage new investment into the District. SP8 refers to an opportunity area at the Kent College Campus for expansion of further and higher education facilities. The Council's Economic Growth Strategy identifies the following target activity: "Work with local partners, including Dover Technical College and the East Kent College Group, to develop skills and training programmes linked to new sectors and investments in Dover District". The strategy also has the following objective under the 'Revitalising our Town Centres Theme': "Develop a new role for town centres as hubs for start-up and scale-up enterprises through the provision of new, flexible workspace concepts and available, through application, town and small business grants".

Issue: Tourism and tourist accommodation:

- AirB&B owners should have to register with the Council for business rate Council Tax (458, 1058, 1476).
- The Council should look at zero carbon tourism / transport activity projects within Dover Town (458, 1058, 1476).
- A coach park with toilets is needed in Dover (458, 1058, 1476).

Response:

Comments noted. Dover District Council has a Growth Strategy for Tourism and The Visitor Economy. Some Airbnb owners do pay business rates and there is an ongoing national debate relating to whether Council Tax should be payable. Stembrook gentlemen's toilets were recently improved.

Issue: Inland Border Facility Site:

- Inland Border Facility (Whitfield): Site purchased for the Dover Inland Border Facility by DfT could be used for grazing under solar (458, 1058, 1476).

Response:

Comments noted. At the current time the Department of Transport's intention for the Inland Border Facility site is unknown. The status of the site is set out in more detail at paragraph 4.86 of the plan.

Other Issues:

- The rural economy is challenged by increasing cost of imports and climate problems. Diversification into agri-forestry could become popular. Land should be used for food rather than livestock. This is key to meeting climate targets and market gardens could provide employment (458, 1058).
- The Local Plan needs to do more than allocating sites and floor space. The local economy needs pump priming, national fuel security enhanced and people lifted out of fuel poverty (458, 1058, 1456).
- Policy fails to consider small business and self-employed persons who do not easily fit in to larger employment zones and are better located in the communities they serve. Many smaller employment sites suit these businesses (e.g. SAP20) but are being converted to housing (750).
- Policy should encourage Incubation Hubs (458, 1058).

- DDC should provide evidence of the number of new homes required to support the level of economic growth proposed in the Local Plan.

Response:

Comments noted. The planning system does not have a significant role in the detailed growing strategies, business formats of agriculture, horticulture or forestry activities. The Council's Economic Growth Strategy sets out the Council's detailed plan to grow the local economy. Paragraph 3.140 refers to the Economic Growth Strategy and its reference to developing a new role for town centres as hubs for start-up and scale-up enterprises. Responses to representations received on Policy SP3 of this document address the number of homes being planned for and the standard methodology.

SP7: Retail and Town Centres

7 Representations have been received from the following consultees:

39 Sue Ward	924 Kent County Council
618 Lidl Great Britain	1172 Historic England
745 Terence Hopper	1595 Sandwich Town Council
792 Langdon Parish Council	

Support

1172 and 792 express general support for the policy.

Issue: Sandwich Retail Need:

- There is still a qualitative need for an additional foodstore in Sandwich. There is limited representation from convenience retailers and only one medium sized foodstore. As a result, expenditure leaks to destinations further afield, with only 14% retained within Sandwich. This is not a sustainable pattern of shopping. Further growth is earmarked for sandwich and the disparity will grow. Object because the local plan does not make provision for additional convenience floorspace, either as a retail allocation or criteria-based policy (618).

Response:

See SP10 'Sandwich Town Centre'

Issue: Retail use at SAP19:

- SAP19 would be equality suitable for retail development and has had retail permission in the recent past. Retail is less vulnerable given risk (618).

Response:

See SP10 'Sandwich Town Centre'.

Issue: Character of Village Centres:

- Should include wording in relation to ensuring that such uses maintain the overall character of the village centre (792).

Response:

Paragraph 86 of the NPPF refers to 'a suitable mix of uses (including housing) and reflects their distinctive characters;' All the Town Centre policies refer to 'character'.



Additional Modification AM16 clarifies the Policy with regard to the need to reflect the individual and distinctive character of settlements.

Issue: Consolidation of the Centre in Sandwich:

- Consolidation of the centre in Sandwich will be difficult due DDC allowing many of the shops to be converted to housing. Do not restrict the provision of shops, services and other businesses to a narrow area in the town. Given the town's scale, such a policy would be very restrictive to future trade within the town (745).

Response:

The policy seeks to ensure that overall vitality and viability of town centres is maintained and strengthened, and the needs of local people are met.

Additional Modification AM16 clarifies the objective of refining and consolidating the town centres and primary shopping area boundaries of Dover, Deal and Sandwich.

Issue: Additional Households in Town Centres:

- Criteria 4 – additional households in these locations will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants /residents (924).

Response:

Comment noted. There are further details on infrastructure provision in the IDP and Policy SP11.

Issue: Upper Floors in Primary Shopping Areas:

- Plan should support proposals to bring upper floors back into use within Primary Shopping Areas, including for residential and office use, unless the current use is for retail and the business is both viable and valued by the local community (1595)

Response:

Policy R1 sets out the proposed policy on bringing upper floors back in to use in Primary Shopping Areas.

Issue: Ground Floors in Primary Shopping Areas:

Issues:

- Plan should not allow permit change of use on the ground floor of any unit within the Primary Shopping Areas and this includes the prohibition on any loss of any square metres of retail space on ground floors (1595).

Response:

Policy R1 sets out the proposed policy on not permitting residential on the ground floor in Primary Shopping Areas.

Issue: The Role of Heritage in Town Centres:

Issues:

- Welcome the focus on town centres and developing tailored strategies for each Town Centre, but the role heritage could play in the future could be enhanced (1172).



Response:

Comments noted.

Additional Modification AM16 adds reference to historic qualities and assets to this Policy.

Other issues:

- Since Covid, shopping habits have changed, with far more done online and there is now empty commercial property (39).
- The plan does not meet the aims of SP7 (4) in terms of ensuring housing development takes place on the outskirts of Sandwich. and so is failing in that respect. Consider the sites SAN010and SAN019 (745).

Response:

Comments noted.

SP8: Dover Town Centre

8 Representations have been received from the following consultees:

41 Sue Ward	972 Talina Wells
459 Sharon Danby	1067 Dover and Deal Green Party
561 Dover Harbour Board	1173 Historic England
925 Kent County Council	1477 Walmer Town Council

Issue: Connectivity of the Town Centre with the Sea Front

- Welcome reference to improvements to the connectivity of the Town Centre with the seafront. The policy and para 3.158 should be clarified to make clear what measures are already being implemented, and what further measures are identified which should be delivered through the development of Dover Waterfront and the Bench Street Opportunity Area (561).

Response:

Comment noted: The Plan needs to be relevant for a significant number of years, and therefore measures implemented, and future changes, will not be static.

Issue: Car-free Development

- This policy could further encourage car-free development within the Town Centre where existing and future controlled parking zones are present, to reduce unnecessary car-based journeys, especially from Whitfield (925).

Response:

Comments noted.

Issue: Additional Households in Town Centres:

- Any increase in households in Dover town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents (925).

Response:

Comment noted. There are further details on infrastructure provision in the IDP and Policy SP11.

Issue: The role of heritage in the Town Centre:

Issues:

- Should more explicitly acknowledge the town's rich historic environment (1173).
- Welcomes General Principle 5 which highlights the role that Dover's heritage can play in successful development, and which links the policy to the forthcoming Supplementary Planning Document (SPD) for the archaeology of Dover Town (925)
- Bullet point 5 of SP8 is welcomed but the implementation section could be strengthened by including reference to development briefs as an additional layer to ensure heritage is understood and celebrated, and that local character and distinctiveness is properly understood and embedded in the planning of a site (1173).

Response:

Comments noted. See proposed Additional Modification AM89 to Policy PM1

Other Issues:

- Impossible to create a more vibrant town centre when the major focus on building is at Whitfield. Dover Town should have been a priority (41).
- Plan for Dover Town Centre is ambitious, but in order to comply with the climate emergency all regeneration should involve renewables and be zero carbon (459).
- High street shops could be renovated and have flats above for locals to rent or buy (459).
- Sunday farmers' market should be tempted back all year round to increase footfall (459, 1067, 1477)
- Incentivise retail start-ups along London Road, Dover between the Charlton Centre and the Cadet centre (459, 1067, 1477).
- Air pollution to be reduced e.g. living walls of vertical planting / urban hedges (rep suggests locations) (459, 1067, 1477).
- Public buildings in Mid Dover offer opportunities to enhance national and local energy security if they were to gain solar power installation that could be used by neighbouring care homes, or doctors' surgeries (459, 1067, 1477).
- More toilet facilities are required (459, 1067, 1477).
- Encourage more cycling and make the area more pleasant for pedestrians with green living walls (459, 1067, 1477)
- More green infrastructure at the heart of continuing regeneration (459).
- Suggestions for public realm improvements and site improvements in Dover town Centre (see rep). A holistic tourism strategy is needed (972).
- There is a need for pleasurable, retail-browsing experiences; This means stopping the Dover gridlock events, and cutting business rates for independent, innovative start-ups (1067, 1477).
- Since Covid, shopping habits have changed, with far more done online and there is now empty commercial property (39).

Response:

Comments noted. The Council's development strategy is discussed in detail at SP3. The Council's Economic Development Strategy was published in November 2021 and sets out some of the Council's 'target activities' as they relate to the town centre. Furthermore, a 'Growth Strategy for tourism and the visitor economy' was published in May 2021. An updated Air Quality Action Plan is expected to be published for consultation in April 2023.



SP9: Deal Town Centre

3 Representations have been received from the following consultees:

926 Kent County Council	1479 Walmer Town Council
1068 Dover and Deal Green Party	

Support

Representation 926 welcomes consideration of the role of the historic environment

Issue: Infrastructure Provision:

- With reference to paragraph 1, any increase in households in Deal town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents (926)

Response:

Comment noted. There are further details on infrastructure provision in the IDP and Policy SP11.

Other Issues:

- Deal Town Centre threatened by congestion. The town would benefit from the '20 is Plenty' policy to make the centres more attractive (1068, 1479).
- Need to incentivise retail start-ups (1068, 1479).
- The plan for a 'Park and Pedal', scheme at Borrowpit Carpark, Walmer is excellent. It would offer opportunities to SMEs to provide small electric hopper buses via CIC and help the town retain footfall (1068, 1479).

Response:

Comments noted.

SP10: Sandwich Town Centre

7 Representations have been received from the following consultees:

175 Aylesham Parish Council	1069 Dover and Deal Green Party
645 Lidl Great Britain	1480 Walmer Town Council
738 Terence Hopper	1596 Sandwich Town Council
927 Kent County Council	

Support:

Representation 927 welcomes consideration of the role of the historic environment

Issue: Approach to Aylesham and Sandwich

- Sandwich has a policy to improve the town and protect the Historic Environment. Aylesham is not getting an equal weight in housing development and investment but has the same weighting in the settlement hierarchy (175).

Response:

Aylesham is not a centre to which development and visitor footfall is being directed. The community could consider if they would wish to prepare a Neighbourhood Plan which would assist the community to agree a vision for the village centre, including where development will be directed and what it should look like.



Issue: Sandwich Retail Need:

- The DRTCNA is based on conservative assumptions that the retail market is in equilibrium, but there is still a qualitative need for an additional foodstore in Sandwich. There is limited representation from convenience retailers and only one medium sized foodstore (Co-op). As a result, expenditure leaks to destinations further afield, with only 14% retained within Sandwich. This is not a sustainable pattern of shopping. Further growth is earmarked for sandwich and the disparity will grow (645).
- SAP19 would be equality suitable for retail development and has had retail permission in the recent past. Retail is less vulnerable given risk (645).
- Need to make provision for additional convenience floorspace, either as a retail allocation or criteria-based policy (645)

Response:

The Council’s Retail and Town Centre Needs Assessment does not identify need for an addition food store in Sandwich. SAP19 had planning permission granted for convenience retail in 2014 but it was never started.

Issue: Infrastructure Provision:

- Any increase in households in Sandwich town centre will require a proportionate increase in infrastructure provision, commensurate with the profile of occupants/residents (927).

Response:

Comments noted. There are further details on infrastructure provision in the IDP and Policy SP11.

Miscellaneous Issues:

- Object because the policy does not Insert new criteria stating: ‘Carry out a full, evidence led, review of pedestrianisation and vehicular traffic in the town centre’ (1596)
- Lacklustre approach. No mention of increasing footfall to businesses by providing extra housing for potential residents. The settlement hierarchy has been ignored. It does not capitalise on positive attributes such as schools, historic environment, road and rail connections and Discovery Park (738)
- The town would benefit from the 20 is Plenty policy to make the centres more attractive (1069, 1480).
- Need to incentivise retail start-ups (1069, 1480).

Response:

Comments noted.

SP11: Infrastructure and Developer Contributions

21 Representations have been received from the following consultees.

42 Sue Ward	1154 National Highways
169 Aylesham Parish Council	1270 Savills on behalf of Church Commissioners
303 Kent Wildlife Trust	1301, 1314 DHA Planning on behalf of Fernham Homes
306 Sport England	1351 Lander Planning on behalf of David Powell
460 Sharon Danby	1481 Walmer Town Council (John Lonsdale)
562 Dover Harbour Board	1597 Sandwich Town Council
588 John Townsend	1727 Walmer Town Council (T Byfield)
606 CPRE Kent	1781 Mairi Jones
929 Kent County Council	1887 Mr and Mrs Armitage



1070 Dover and Deal Green Party	1976 Neil Oldfield
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Support

Representations 306 and 1351 support this policy. Representation 929 welcomes the inclusion of County Council infrastructure and services

Issue: Viability:

- Support flexible approach to viability considerations (562)
- Object - Viability considerations and site-specific circumstances has allowed developers to reduce progressively the Section 106 payments and it is not the Council’s role to have regard to any planning application’s financial viability (460, 1481)

Response:

The 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.

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. Therefore, the policy reference to allowing assessment of viability is required for the policy to be sound.

Issue: Community Infrastructure Levy (CIL):

- CIL would provide developers, planners and residents with the certainty of knowing what the community costs would be. (460, 1481)
- Objection to SP11 on the basis that the Council has not adopted a CIL charging schedule (1070)

Response:

As set out in policy supporting text, it is not the Council's current intention to introduce CIL in the District, as Section 106 legal agreements are considered to provide a greater level of certainty for delivery of specific infrastructure and there are now emerging national plans for a new Infrastructure Levy which would replace CIL.

Issue: Highways:

- SP11 should be more succinct about transport infrastructure and link sites to specific projects. The wording of the policy does not provide sufficient indication of when infrastructure will be sought. Reference to site-by-site viability is noted, however it is essential that sufficient detail is included within the whole plan viability assessment. (929)
- Supporting text to be updated to reflect the need for SRN impacts always to be mitigated, but that the method of ensuring so may vary (1154)
- There are number of issues not clearly addressed, such as if developers would be made to better fund road improvements not just section 19 (1727)
- Assessment of traffic on local roads including that generated by construction is needed before S106 contributions are made (588)



Response:

Specific highway projects, where they have been identified by KCC/NH, are already included in site specific policies and the IDP. See most up to date SoCG with KCC and/or for any updates to specific highway mitigation projects. The Local Plan viability work does take account of site-specific viability issues.

Policy T12 requires Transport Assessments/Statements and Travel Plans to be undertaken prior to applications being assessed, to ensure relevant mitigation is secured through S106 process.

Additional Modification AM17 provides clarification of Strategic Road Network mitigation.

Issue: Timing and detail of Infrastructure:

- Infrastructure should be in place before developments are allowed to begin (42)
- Play areas and open spaces should not be last to be delivered (169)
- DDC to ensure that any developer contributions meet with the tests set out in paragraphs 56 and 57 in the NPPF (1270)
- Any infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage (1301, 1314)
- Equal weight should be given to the consideration of walking, cycling, public transport and the highways network (1597)
- Proper cost contributions from developers and proper investments in existing and new infrastructure, legally enforceable obligations between DDC and developers. More supervision and inspection of developments and infrastructure by DDC is needed. (1976)
- Policy does not mention the recent legal compliance required under the Environment Act 2021 for 10% BNG. Recommend that the above is included or reference is made to other policies within the Plan. (303)

Response:

The PPG and legislation set out clear legal 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.

Other policies in this plan address matters such as requirements for sustainable travel, BNG and open space and play.

Issue: Specific Infrastructure improvements

- Whitfield does not have the required infrastructure, which is why there have been flooding and sewerage problems. It also has inadequate transport links (42)
- Developments should not be permitted without a nearby rail connection (42)
- IDP comment: why would S106 monies from Aylesham be spent upgrading play areas in Nonington? PC is identified as “Delivery Partners” on a number of projects due to be delivered: we have not been consulted on this prior to the Regulation 19 document being released. (169)
- Request that it is made clear what infrastructure will be required, who will provide it, where it will be delivered, when it’ll be delivered and how much it will cost (606)
- There are 19 HWRCs, not 18 (929)



- Pooling of S106 funds should be utilised to address highways safety matters in Sandwich. (1597)
- S106 funds be increased for disability access improvements within Sandwich (1597)
- Concerned that sewage regularly backs up in the base of the Alkham valley (1781)
- June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans (1887)

Response:

All specific infrastructure requirements are considered, working with the relevant providers at the time of planning applications. Where they are already known, requirements are reflected within the IDP and specific site policies. These are costed and funding and delivery detailed where this has been possible.

Comments noted around errors within the IDP and these will be updated in the 2023 update of the IDP. The term ‘delivery partners’ is a general term used to cover all parties which may have responsibility for delivering and/or maintaining infrastructure. Where PC’s are referenced, this is to cover areas such as play, open space and community facilities where the town or parish may have ownership and/or management responsibilities and to ensure they are consulted on the project delivery of community facilities in their area. Other local projects, where evidenced, can be included within the IDP as they come forward as this is a ‘living’ document.

Additional Modification AM18 updates the number of Household Waste Recycling Centres.

SP12 Strategic Transport Infrastructure

32 Representations have been received from the following consultees:

19 Peter Jull	1071 Dover and Deal Green Party
152 Aylesham Parish Council	1155, 1161 National Highways
343 Deal & Walmer Chamber of Trade	1174 Historic England
463 Sharon Danby	1212 Gladman Developments
495 Dover and Deal Liberal Democrats	1302, 1316 DHA Planning on behalf of Fernham Homes
500 Alkham Valley Society	1318 Canterbury City Council
607 CPRE Kent	1453 HS1 Ltd
758 Sindy Denyer	1482/1512 Walmer Town Council
795 Langdon Parish Council	1605 Sandwich Town Council
930 / 1036 Kent County Council	1642 Tilmanstone Parish Council
1018 DHA Planning on behalf of Danescroft Land and Pentland Homes	1671 Alkham Parish Council
1054 Strutt and Parker on behalf of Dover Harbour Board	1790 Mairi Jones
1055 Strutt and Parker on behalf of Nigel Snape	1803 Linda Symes
1060 Robert Hogben	2027 Mark Heath

Support:

- Representations 495, 1605 and 1318 support Strategic Highway measures
- 1018 supports the seeking of appropriate developer contributions

- 1054 and 1055 support the principle to remove HGV's from the highway, but requires amendments to other policies to reflect need for Inland Terminal/lorry parking
- 1453 supports HS1 'Dover in 60' project reference

Issue: Funding and Delivery

- Clarification required regarding funding and delivery of Strategic Highway mitigation schemes (1161)
- Infrastructure requirements must be demonstrated through a robust and transparent assessment at application stage (1302/1316)
- Reference the need for a Stage 1 Safety Audit to be undertaken to support the mitigation schemes at the A2 Whitfield roundabout and the A2 Duke of York roundabout. (1155)
- Reference the requirement for third party land to be identified to support the A2 Duke of York mitigation (1155)
- Strategic infrastructure upgrades have potential to impact non-designated archaeological remains, we would encourage early engagement with the Council's archaeological advisor as proposals come forward (1174)
- More clarity and detail needed to identify which development sites are anticipated to provide contributions towards each of the schemes (1212)
- Would like to work with DDC on developer contributions tariff for HS1 (1453)

Response:

The detailed requirements for mitigation requirements on a site by site basis is already set out within site specific policies where this is known already, and in all cases will be reviewed as part of a planning application and S106 negotiation at the time. This would include a review of the most up to date evidence, including the IDP and other details established through Transport Assessments and Travel Plans for example. Consultation with the relevant stakeholders will also take place at the time of the planning application, including for sustainable travel projects.

The A2 mitigation scheme RSAs will be addressed prior to Examination/Adoption of the Local Plan and do not need to be referenced within the policy.

The IDP is a living document will be updated to reflect the most up to date projects, delivery and implementation information. It also includes a draft Tariff approach based on a zoned area of the district for the SRN mitigation A2 schemes.

Additional Modification AM20 provides further information on Strategic Road Network mitigation schemes and delivery.

Issue: Specific Road Network Mitigation:

- 3.227 references KCC's Growth Without Gridlock which includes a project called 'North Deal access road'. London Road/Manor Road cannot be mitigated and is limiting growth in Deal. Local Plan should include reference to North Deal scheme and collect S106 contributions (19, 343)
- Significant upgrades are needed to key routes such as Spinney Lane and B2046 (Adisham Road) (152)

- Constraints of existing road system (A258, A2, A256) Need to dual the A2 and Separate local traffic from freight traffic (463, 1512)
- Concerned that the A250 at Denton and Wingham will not be able to cope with the increased traffic (495)
- Alkham Valley road already operating near capacity as well as being unsuitable for heavy or fast traffic. Any major road upgrades should be planned in conjunction with traffic calming measures to avoid unintended adverse consequences (500, 1671, 1790)
- Modelling forecasts indicate that infrastructure improvements are required on the A256 corridor. Given that this road corridor forms part of the Major Road Network, it would be prudent to consider policy to safeguard future upgrading opportunities on this road corridor (930)
- Modelling indicates that development is not sited in the most suitable places (607)
- Concerns that traffic surveys were undertaken post pandemic. (1642)

Response:

The North Deal access road mitigation was explored early in the plan making process and the outcome of that modelling and feasibility work is set out in the IDP. Impact upon Alkham Valley Road has been assessed and potential mitigation identified, this will be included in the updated IDP.

Issue: Sustainable Travel:

- Focus on pedestrian and cycle traffic and improving substandard bus and train services. Many rural communities are entirely car dependent (152, 1060, 463)
- Increased bus network connectivity is welcomed - but have Statements of Common Ground been signed to confirm bus operators are in agreement? (607)
- Bus services should be reinstated to meet zero carbon commitments, with better integrated rail service timetable (463, 1071, 1482, 1512)
- SP12 uses South East Transportation Strategy 2020 but bus services have since been cut by KCC in 2022. Plan does not address further funding (758)
- Engineered cycle routes needed which are lit/safe. Eythorne mentioned (2027, 1482, 1512)
- The policy should also specifically allow for the provision and maintenance of bus shelters under the heading of Bus Infrastructure (930)
- The County Council requests that this policy includes consideration for how walking and cycling opportunities, including the PRoW network, can be improved (930)
- The document is relatively silent on the emerging Dover Fastrack project (1036)

Response:

Paragraph 3.244 explains that ‘complementary infrastructure’ stated in SP12 includes Bus Shelters.

In East Kent, the majority of bus services are provided by the private bus operator, Stagecoach. However, as the Local Transport Authority, KCC maintains overall responsibility for bus infrastructure and provides funding to subsidise some routes which are not viable for private bus operators to run.

DDC are aware of the recent cuts to some bus services in the district. KCC have confirmed that most changes to bus services have been proposed by the private bus companies. This is due to a number of factors including significant financial pressures from rising costs, significantly lower passenger



numbers since the pandemic (local use of buses is around 80% of pre-pandemic levels with off peak services much less than this) and a shortage of drivers.¹

KCC continues to invest in bus routes and has boosted money available for local community transport schemes. This position is also supported by DDC within the Local Plan through Policy SP12 and the introduction of the Demand Responsive Service recently commenced in Aylesham area, part funded by developer contributions², which will be monitored through the plan period.

In addition, KCC state that it is working with operators of recently changed routes to try to provide alternative services. DDC will continue to liaise with the Public Transport teams and will reflect any updates within the IDP where this is possible.

Additional Modifications are proposed to provide clarification on a number of transport issues. These can be found against TI1 (rather than SP12) in relation to bus shelters (AM99) and against site specific policies in relation to Fastrack and other sustainable travel modes. In addition, several modifications have been proposed in relation to PROW network across the Local Plan in the Transport policies and site allocation policies.

SP13: Protecting the District’s Hierarchy of Designated Environmental Sites and Biodiversity Assets

28 Representations have been received from the following consultees:

18 Peter Jull	1061 Robert Hogben
43 Sue Ward	1072 Dover and Deal Green Party
230 Helen Williams	1101 Susan Sullivan
254 Kent Downs AONB Unit	1105 Susan Sullivan
304 Kent Wildlife Trust	1175 Historic England
395 Susan Sullivan	1352 David Powell
466 Sharon Danby	1423 National Trust
498 Dover and Deal Liberal Democrats	1447 Walmer Town Council
508 Alkham Valley Society	1484 Walmer Town Council
652 The Woodland Trust	1563 Nikky Warden
779 Marine Management Organisation	1608 Sandwich Town Council
876 Peter Findley	1661 Alkham Parish Council
936 Kent County Council	1704 Walmer Town Council
1012 Peter Findley	1788 Mairi Jones

Support

Representations 18, 254, 498, 1175, 1352 and 1423 find this policy sound.

Issue: Priority Habitats:

- Concerned that the Plan does not state there should be no loss of priority habitats. 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. (304)
- Add reference to priority habitats and species to this policy (1101, 1105)

¹ [Bus services in Kent - Kent County Council](#)

² [Get onboard with the new on-demand bus service for Aylesham and surrounding villages \(dover.gov.uk\)](#)



Response:

Protection of priority habitats is addressed under SP13 (h), and priority species are included under SP13 (i). Effective application of the mitigation hierarchy to development affecting priority habitats will ensure there is no loss of priority habitats.

Issue: Ancient Woodland:

- Criteria g welcomed but recommend requirement for a minimum 50m buffer where development adjoins ancient woodland (652)
- Boundaries of SAP1 should be changed to protect ancient woodland (652)

Response:

SAP1 f protects areas of ancient woodland near the Whitfield Urban Expansion site. A buffer of 30m is supported by representations on the site allocation policy, including by this consultee. Natural England's Standing Advice recommends a minimum 30m buffer to ancient woodland, this buffer width is considered on a case-by-case basis in this Plan.

Issue: Site-specific Designation Changes:

- Betteshanger Park was originally intended by SEEDA to be designated as an LNR, and should now be designated as an area of high biodiversity or a BOA (230, 876, 1012, 1447)
- Tilmanstone Colliery Tip should be landscaped to become a local nature reserve and an amenity of Elvington and SAP 28 (1704)

Response:

The biodiversity of Betteshanger Country Park is recognised given the presence of priority habitats and protected and designated species. The protection and enhancement of locally designated environmental sites is an important aspect of Local Plan policy. The designation of such sites is a procedure that is separate to the local plan process.

Issue: Biodiversity Assessments:

- Section h should require details of compensation for loss or damage to locally identified biodiversity assets to be submitted as part of planning applications (936)
- More robust auditing of biodiversity assessments is required (466,1072, 1484 and 1563)
- Some of the allocated sites are close to the border of other districts. It is therefore recommended that the policy allows for flexibility for works to be carried out outside the district where it may be appropriate (936)

Response:

Details of information to be submitted as part of planning applications is set out in paragraph 3.282 of the supporting text to this policy. It is considered that this cross-boundary issue cannot be addressed in a Dover specific policy without agreement of neighbouring authorities and would make monitoring/enforcement issues difficult to address. However, as with all planning applications, specific issues such as this can be considered as they come forward.

Issue: Marine and Coastal Access Act

- There is a statutory duty of the Local Authority to take account of Marine Plans and Marine Planning documents when developing local plans in accordance with the Marine and Coastal Access Act 2009. The current reference to Marine Plans in section 3.267 correctly refers to the marine plans but does not explicitly demonstrate this requirement being met.



Response:

Comment noted.

Additional Modification AM22 confirms that the Council has taken account of the South East Marine Plan in the production of this Local Plan.

Other Issues:

- Policy should state that all LWS, LNR and sites with identified high biodiversity value will be protected from development (395)
- Clarity on the definition of “locally important habitat” in Dover is required (chalk grasslands, rough-grazed grassland and semi-improved grasslands are a vital part of the ecological network). (304)
- Add Delf Stream, Sandwich Waterways and adjoining green areas to this policy (1608)
- SP13 should be accompanied by a detailed evidence base of locally important habitats, identifying key areas for the creation, restoration and enhancement. (304)
- Better traffic controls in Alkham Valley will help protect environmental assets here (508, 1661, 1788)
- Policy should require EIA on all developments over 15 dwellings on greenfield land (466,1072, 1563)
- Disagree with use of Mitigation Hierarchy (466, 1061)
- Add reference to Kent’s Plan Bee, a pollinator action plan developed by the County Council that seeks to improve the food sources and general habitat for pollinators (936).
- Hire several biodiversity officers to monitor closely and prevent loss of ancient woodland, chalk grassland, veteran trees, protected wildlife and rich habitats and to actively go out into the community, looking for ways to improve biodiversity by such things as accessing grants for hedge planting and the creation of ponds wherever possible.
- Employ experts to liaise with farmers in our area to encourage the most environmentally friendly farming and land management practices which will encourage maximum biodiversity in the countryside and maximum sequestration of carbon in soils and biomass.

Response:

The Dover District Green Infrastructure Strategy and Evidence Report provides the detailed evidence base for this policy. Protection of environmental sites is addressed by this policy and by the mitigation hierarchy as required by, and set out in, the NPPF. Chalk grasslands added to text of SP13. Plan Bee added to paragraph 3.275. Impact upon Alkham Valley Road has been assessed and potential mitigation identified through SP12. EIAs on ecology grounds are required in circumstances where development is likely to impact on a statutory designated site and is considered under separate Regulations. Comments on staffing noted.

Additional Modifications AM22 and AM23 add reference to chalk grasslands and to Plan Bee.



SP14: Enhancing Green Infrastructure and Biodiversity

21 Representations have been received from the following consultees:

207 Colin Watson	1102 Susan Sullivan
255 Kent Downs AONB Unit	1104 Susan Sullivan
305 Kent Wildlife Trust	1213 Gladman Developments Ltd
349 Kent Wildlife Trust	1353 David Powell
398 Susan Sullivan	1435 RSPB
471 Sharon Danby	1485 Walmer Town Council
664 The Woodland Trust	1496 Environment Agency
877 Peter Findley	1536 Adisham Parish Council
937 KCC	1564 Nikky Warden
1040 KCC	1610 Sandwich Town Council
1073 Dover and Deal Green Party	

Support:

Representations 255, 1353 and 1536 find this policy sound.

Issue: Biodiversity Net Gain

- welcome reference to BNG in this policy but wish to see requirement for 20% (305, 471, 664, 1073, 1485, 1564)
- Support policy but it should make clear that 10% BNG is aspirational and not an absolute target (1213)

Response:

Comments noted. See responses to Policy NE1.

Issue: Extent of BOAs, Lack of LNRS, Status of Sites in Sandwich:

- Not enough BOAs are designated (1073, 1485)
- concerned that LNRS has not yet been provided (349)
- Monks Wall reserve, Gazen Salts and Sandwich Bay Bird Observatory should be included in this policy (1610)

Response:

BOAs were established using a range of biodiversity data. The LNRS will supersede the BOAs in due course. KCC is the Responsible Authority developing the LNRS and DDC (and KWT) are engaged in the process through the Kent Nature Partnership. Monks Wall reserve, Gazen Salts and Sandwich Bay Bird Observatory are included as Environmental Assets, as shown in Fig 3.5 of this Plan.

Issue: Protection and Enhancement of Wildlife and Trees in New Development:

- Policy should require bird boxes, bat boxes, swift bricks, street trees and garden trees on all new builds (1073, 1485)
- Add requirement that all trees on boundaries of large developments and pockets of existing trees should be retained (1073, 1485, 1610)

Response:

The provision of hedgehog highways, bat roosts, swift bricks, bee bricks and street trees are included in Policy PM1. Policy CC8 provides the policy for tree planting and protection, including a requirement for the planting of a minimum of two new trees per new dwelling.

Issue: PROW and Health References:

- Add references to PROW and national and historic routes, and references to GI and health (937, 1040)

Response:

References to historic landscapes and footpaths are addressed by policy NE2. The link between Green Infrastructure and health is noted in paragraph 3.286.

Issue: Betteshanger Park:

- Fig 3.6 should show priority habitat Open Mosaic habitat at Betteshanger Park and Betteshanger Park as a biodiversity asset as part of Lower Stour Wetland BOA (398, 877, 1102)

Response:

The Lower Stour Wetland BOA is shown on Fig 3.6. Betteshanger Park is shown as falling within this designation.

Issue: Priority Species:

- SP14 doesn't mention species. Suggest adding to policy that planning proposals will not be supported that would damage the green infrastructure of the district and/or harm sites supporting any of the following: priority habitats, priority species, protected habitats and protected species. (1104)

Response:

Comment noted.

Additional Modification AM25 adds priority species to this Policy.

Issue: Turtle Doves

- Add requirement for breeding bird surveys in all Turtle Dove Friendly Zones, on an area with known Turtle Doves or containing good quality Turtle Dove nesting habitat (1435, 1104)

Response:

Site-specific criteria added to SAP28 and SAP52 as advised by RSPB. See Additional modifications AM59 and AM83.

Other Issues:

- Policy should require EIA on all developments over 15 dwellings on greenfield land (1073,1485)
- Would welcome more commitment to river restoration, mention of light pollution and links to the Government's 25 year Environment Plan (1496)
- Policy should state that all brownfield and redevelopment options should be fully exhausted before greenfield development is permitted (207)
- Policy should encourage police to tackle hunting and drag hunting (1073, 1485)



Response:

See response to SP13 on EIAs. Water supply and quality addressed in policies NE5 and NE6, and light pollution in Policy PM2. The Environment Plan is referenced and linked to the Dover Green Infrastructure Strategy which forms the evidence base for this Policy.

The housing growth strategy seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (viability and delivery) greenfield sites have had to be identified to meet the District’s housing needs and ensure a continuous supply of housing across the plan period.

Hunting is not a local plan matter.

SP15: Protecting the District’s Historic Environment

14 Representations have been received from the following consultees:

44 Sue Ward	1176 Historic England
512 Alkham Valley Society	1200 Historic England
573 Dover Harbour Board	1354 David Powell
938 Kent County Council (KCC)	1611 Sandwich Town Council
939 KCC	1668 Alkham Parish Council
940 KCC	1779 Mairi Jones
941 KCC	1789 Mairi Jones

Support

Representations 573, 938, 941, 1354 and 1176 find this Policy sound.

Issue: Heritage at Risk:

- Plan should have a specific Heritage at Risk Policy (1200)
- Suggest the District Council prepares a local register of Heritage at Risk to complement a Local List (940)

Response:

Heritage at Risk is covered by Policy HE1. A local register of Heritage at Risk register is a recommendation of the Dover District Heritage Strategy (2013, updated 2020) and is referenced in paragraph 12.6 of this Plan.

Issue: Registered Parks and Gardens:

- Reference to Historic Parks and Gardens should be corrected to Registered Parks and Gardens (939)
- Historic Parks and Gardens Monks Wall Nature Reserve, Gazen Salts Nature Reserve and the entire original town wall of Sandwich should be added to Historic England’s register of Parks and Gardens of Specific Interest and Kent Gardens Compendium (1611)

Response:

Clarification of references to historic parks and gardens will be made. Entries to Historic England’s Register of Parks and Gardens are the responsibility of Historic England; the Kent Gardens Compendium that of Kent County Council.

Additional Modification AM26 clarifies the references to historic parks and gardens.



Issue: Alkham:

- Object to lack of mention of heritage of the village of Alkham
- Alkham should have a Conservation Area; Plan should address rerouting of HGVs away from Alkham Valley Road to protect listed buildings

Response:

It is not possible within the Plan to include reference to the heritage of every settlement in the district. Conservation Area designation is not within the remit of the Local Plan. Impact upon Alkham Valley Road of HGVs has been assessed and potential mitigation identified. Policies TI1 and TI2 seek to ensure the impact of new development on the existing highway network is minimised.

Other Issues:

- Boundaries of SAP1 should be adjusted to reduce proximity of new development to listed buildings.
- Update reference from 12,000 entries for Dover District in HER to 14,000 (939)

Response:

The protection of heritage assets and their settings from the Whitfield Urban Expansion is required by Policy SAP1 aa. Update in entries to Kent Historic Environment Record for Dover District noted and reference updated in paragraph 3.296.

Housing and Employment Site Allocations

Of the representations received on the Site Allocation Policies of this Plan, a significant number raise concerns about the existing capacity and adequacy of local facilities and infrastructure serving the rural settlements of the district. Particular mention is made of health services, primary school provision, roads, and the water and wastewater utilities.

In addition, many representations draw attention to the decision in October 2022 to reduce the timetables and cut many of the bus services that provide public transport for large areas of the district. In order to reduce duplication in this document, these issues are responded to here at the outset of this section of the Summary report.

Many representations made on site allocations raise issues concerning the environment, including landscape designations and character, habitats and species, as well as heritage matters. As these tend to be locally specific, such issues are addressed against the site allocation policy itself. There will be some overlap however, and therefore responses to both strategic and development management policies on these topics may also prove helpful.

Infrastructure Concerns

It is accepted that new development proposals and increases in population may affect existing infrastructure and local services and may require new provision or enhancement to provision to meet their needs.

Therefore, all relevant service providers including (but not limited to) KCC (Highways, Education, Public Transport, health, waste, social and community teams), the NHS, rail, bus, water and utility companies and internal DDC departments for open spaces, sports and play are consulted at all stages

of the plan making process to identify if the services they provide have existing capacity or if additional capacity is needed to accommodate additional development.

If additional capacity is needed, this is then planned for through the Local Plan process and outlined the Infrastructure Delivery Plan (IDP), which supports the Local Plan. It is the responsibility of service providers and stakeholders to identify and ensure delivery of the infrastructure that is required.

The Local Plan plays a supporting role in helping to deliver the infrastructure, by allocating sites or requiring developers to make financial contributions through the developer obligation process (as set out in Policy SP11). Where the providers have raised concerns with specific local infrastructure, these have been addressed within the specific site policies. DDC will continue to work with these stakeholders in understanding the districts infrastructure needs and update the IDP as the position changes.

Highway specific concerns

As part of the Local Plan preparation, all potential sites were assessed to determine their specific impacts and potential cumulative effects on the road network. Where it is considered that mitigation was required (in consultation with Kent Highways), this is identified within site specific policies and the Infrastructure Delivery Plan (IDP) which supports the Local Plan.

Where the impacts of development were considered to be 'severe' and there were no deliverable options for mitigation, sites were considered unacceptable. As part of a planning application, developers will need to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable transport options. This will need to address issues identified in the Local Plan policies and the IDP. KCC Highways will review this and determine whether the traffic generated from a scheme creates an issue that requires resolution through the provision of local road and/or footpath and cycle path improvements. If off-site improvements are needed, then the developer may enter into a separate legal agreement with KCC Highways.

Bus services changes

In East Kent, the majority of bus services are provided by the private bus operator, Stagecoach. However, as the Local Transport Authority, KCC maintains overall responsibility for bus infrastructure and provides funding to subsidise some routes which are not viable for private bus operators to run.

DDC are aware of the recent cuts to some bus services in the district. KCC have confirmed that most changes to bus services have been proposed by the private bus companies. This is due to a number of factors including significant financial pressures from rising costs, significantly lower passenger numbers since the pandemic (local use of buses is around 80% of pre-pandemic levels with off peak services much less than this) and a shortage of drivers.

KCC continues to invest in bus routes and has boosted money available for local community transport schemes. This position is also supported by DDC within the Local Plan through Policy SP12 and the introduction of the Demand Responsive Service recently commenced in Aylesham area, part funded by developer contributions, which will be monitored through the plan period.

In addition, KCC state that it is working with operators of recently changed routes to try to provide alternative services. DDC will continue to liaise with the Public Transport teams and will reflect any updates within the IDP where this is possible.



Introduction to Housing and Employment Site

Allocations:

11 Representations have been received from the following consultees:

13 Martin Brandon	1177 Historic England
20 Peter Jull	1398 Jill Cliff
347 Mark Heath	1454 Natural England
723 Irene Bowie	1501 Environment Agency
942, 943, 964 KCC	

Issue: Approach to Housing Distribution:

- Other design principles such as New Urbanism should be promoted, instead of garden village principles
- Object to the loss of habitats and agricultural land. Building should be on brownfield sites

Response:

The approach to housing distribution of this Local Plan is set out in the supporting text to Policy SP3 and in paragraphs 4.1 – 4.10 of this Section. The housing growth strategy seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (viability and delivery) greenfield sites have had to be identified to meet the District’s housing needs and ensure a continuous supply of housing across the plan period.

Issue: Contaminated Land:

- The wording contaminated land has a legal definition under Part IIa S 78A. There are no current determined Contaminated Land sites in Dover, and therefore the wording of paragraph 4.38 needs to be changed to land affected by contamination.

Response:

Comments noted.

Additional Modification AM28 corrects the reference to land affected by contamination.

Issue: Heritage:

- Text needs to be strengthened so that the heritage of the new settlement is fully integrated into the new design.

Response:

The Garden Village principles have been taken from the [TCPA Guide to understanding Garden Villages](#) and therefore amendments to the wording here in relation to heritage are not appropriate. Heritage is Addressed by Policy PM1

Issue: Transport and Infrastructure:

- Site specific public transport and sustainable transport strategies should be considered at this stage
- The PRoW network should be included in all Transport Assessments



Response:

The wording of T12 requirements for Transport Statements and Travel Plans is taken from national and KCC guidance, and cross refers to those documents.

Issue: Overwintering Bird Surveys:

- Requirement for wintering bird surveys feels quite precautionary and potentially places an unreasonable expectation on future developers of smaller or more distant sites.

Response:

Please see response to SP13

Other Issues:

- Error in describing Shepherdswell as lying to the west of A2. Disagree with Settlement Hierarchy scoring and that the process only records the advantages of settlements and not the negatives.
- Stop empty properties and second homes.

Response:

Paragraph 4.209 corrected. Please see response to Appendix E for matters related to Hierarchy scoring. Other comments noted.

Dover Site Allocations

Introduction to Dover Site Allocations:

7 Representations have been received from the following consultees:

479 G Virtue	985 Dover Harbour Board
698 Alan David Stegall	1554 Cllr Nigel Collor
945 Foster and Payne (Robert Harley)	1731 Quinn Estates Ltd
961 Sharon Danby	

Support:

The increase in the number of sites in Dover Town was supported, while 985 welcomes the increase in indicative housing capacity of SAP3 Dover Waterfront.

Issue:

1554 objects to the loss of car parks in Dover Town centre including at Bench Street

Response:

Comments noted



SAP1: Whitfield Urban Extension

33 representations have been received from the following consultees:

46, 47, 115, 116, 117, 118 Sue Ward	965, 966 KCC
73, 74 Richard Ledgerwood	1074 Dover and Deal Green Party
170, 354 Joe Ledgerwood	1157 National Highways
241 Foster & Payne	1232 Quod on behalf of Halsbury Homes
256 Kent Downs AONB Unit	1340 Bloomfields on behalf of The Land Trust
587 Bidwells on behalf of Emmanuel College	1455 Natural England
609 CPRE Kent	1541 Walmer Town Council
672 The Woodland Trust	1552 Cllr Nigel Collor
730 Alkham Parish Council	1732, 1742 Icen Projects on behalf of Quinn Estates
752 Terence Hopper	1784 Mairi Jones
900 DHA Planning on behalf of Danescroft Land Ltd and Pentland Homes Ltd	1814 Oliver Ledgerwood
963 Sharon Danby	2028 Margaret Kemp

Support:

- 1157 is overall supportive of the allocation
- 1989 strongly supports policy provisions (d), (e), (f), (g), (h), (k), (l), (p) and (z)
- 256 supports the protection of potentially diverted North Downs Way at criterion z)
- 241 believes SAP1 is sound but seeks the inclusion of an allocation within the site for a development of specialist older persons' housing

Issue: principle of development at Whitfield

- 1074 and 1541 object to the scale of development proposed which is too large
- 46 and 47 argue that the Council should prioritise the regeneration of Dover Town over development at Whitfield – 46, 47
- 609 objects to the loss of agricultural farmland, darker skies

Issue: Phasing and Delivery

- 900 supports the allocation and confirms availability of site, commits to updating SPD and recognises infrastructure requirements at Whitfield and Duke of York roundabouts. Satisfied DtC has been met. Also agrees with capacity identified in the Plan period and advises delivery to commence on Pentland Homes site in year 4
- 609, 1732 and 1742 object to the Plan's over-reliance on the Whitfield large strategic site, while 587 objects to the reliance on delivery from Whitfield later in the Plan period as opposed to sites which are able to deliver earlier

Response

The assumptions regarding the Whitfield Urban Expansion (WUE) delivery are reasonable and realistic (see Housing Topic Paper Update 2023). Whitfield Urban Expansion is the most sustainable location for significant growth in the District, and providing further sites in the less sustainable locations, requiring further greenfield land would result in a less sustainable pattern of development that is not necessary to meet the housing needs of the District.

The supply of sites provides a continuous sufficient supply across the plan period as set out in the housing trajectory, and in the short term, as shown by the five-year housing land supply position.



Issue: Update to SPD:

- 966 advises that a new SPD is required in order to avoid a policy vacuum
- 1232 objects to the requirement for a new SPD, instead proposing that the existing SPD is used for existing phases and supplementary document produced for additional 600 dwellings

Response:

An updated masterplan is required in order to take account of changing circumstances since the original allocation for the site in the Core Strategy in 2010, and assist in speeding up delivery of the site. This could be done through an update to the SPD or by means of an outline planning application for the remainder of the site that is not subject to existing planning consents. No policy vacuum exists as the existing still provides an appropriate framework for the immediate next phases of development (Phase 2)

Additional Modifications AM29 and AM30 clarify the text of this policy and its supporting text to enable flexibility regarding the update to the SPD/masterplan, clarity on stakeholders and that Phase 2 can come forward in accordance with the existing SPD prior to a new masterplan being prepared.

Issue: Heritage:

- 73, 118 and 1814 object to the allocation on the grounds of impact on listed buildings and their setting, specifically those at Singledge Farm and Singledge Manor.

Issue: Flooding:

- 115, 116 and 2028 object due to existing flooding issues at Nursery Lane/Singledge Lane

Issue: Climate Change:

- 1051 objects on the ground that the policy wording not strong enough on net zero strategy and climate change emergency

Issue: Impact on Ancient Woodland:

- 672 supports the safeguarding of a 30m buffer to be provided around expansion and paragraph of policy
- 2028 objects on the ground of impacts on biodiversity at Captains Wood
- 74 and 354 object to the allocation on the ground of impact on ancient woodland

Issue: Transport:

- 730 and 1384 object due to impacts on the capacity of Alkham Valley Road and, linked to this, the amenity of Alkham residents
- 963, 965, 1074, 1541 and 2028 raise the issue of transport links to and from the site. Specifically mentioned is the need for safe walking and cycling routes to schools and connections to railway stations at Kearsney, Martin Mill and Elvington
- 1157 requests more specificity on sustainable travel modes within policy wording

Response:

These issues are addressed by policy criteria to minimise impacts. Impact upon Alkham Valley Road has been assessed and potential mitigation identified.



Additional Modification AM30 updates criteria w) in relation to sustainable travel modes and fastrack service.

Issue: Infrastructure/community facilities:

- 1552 seeks assurance that community facilities play a key role in the development proposals
- 752 and 2028 object on the grounds of a lack of infrastructure, specifically including doctors/dentists and secondary school expansion

Response:

Addressed through SAP1 and Infrastructure Delivery Plan

Issue: Impact on SAC:

- 1340 expresses interest in discussions with the Council/developers with a potential view to assisting meeting policy requirement for SANG to mitigate impact on Lydden/Temple Ewell SAC
- 74 objects due to impacts on Lydden/Temple Ewell SAC from recreational pressure and pollution

Response

Impacts upon the SAC have been considered and addressed through the Habitats Regulations Assessment and specific requirements of Policy SAP1 criterion I)

Other Issues:

- 117 makes reference to impacts on touring caravan locations on Singledge Lane
- 609 objects to lack of any mention of garden city principles in the policy wording when compared to other strategic allocations

Response:

Impact on touring caravan locations can be mitigated through layout and design of development.

Additional Modification AM30 adds Garden Village principles to this policy.

SAP2: White Cliffs Business Park (phases 2, 3 and 4) Whitfield

10 representations have been received from the following consultees:

21 Peter Jull	1954 Terry Sutton
592 Citycourt Developments Ltd	257 Kent Downs AONB Unit
979 KCC	825 Citycourt Developments Ltd
1075 Dover and Deal Green Party	1160 National Highways
1542 Walmer Town Council	1935 Icen Projects on behalf of Quinn Estates

Support:

- 257 supports safeguarding of North Downs Way as it passes through the site, and considers that although the proposals could have an impact on the AONB, appropriate safeguards are included in the policy wording to manage these impacts
- 592 supports the legal compliance of the site’s inclusion and 825 supports its allocation

Issues:

- The current Plan safeguards land for a ‘green bridge’ pedestrian connection over the A2 for the North Downs Way and this safeguarding should continue
- PROW EB10 should be included in SAP2
- Pedestrian routes should be provided, bus services cut in 2022 should be reinstated and cycle routes should be provided from Whitfield to Kearsney and Martin Mill stations
- Reliance placed on employment growth at Whitfield due to less-than-forecast growth under the Core Strategy and part of phases 2 and 3 being subject to SDO, in doing so promoting employment land at Northwall Road, Deal
- Whitfield and B&Q roundabouts are already congested and traffic should use a new route round the back of Whitfield instead

Response:

PROW EB10 is not located within or near to the site. Policy already states ‘PROW network improvements’, so covers all in the area.

At the current time the Department of Transport’s intention for the Inland Border Facility site is unknown. The status of the site is set out in more detail at paragraph 4.86 of the plan. Necessary transport mitigation has been identified.

SAP3: Dover Waterfront

6 representations have been received from the following consultees:

563 Dover Harbour Board	980 KCC
821 DDC	1076 Dover and Deal Green Party
1178 Historic England	1543 Walmer Town Council

Support:

821, 1076 and 1543 support the allocation of SAP3. 563 and 1178 support with modifications related to the site boundary and to high quality design.

Issues:

- Potential impacts of the allocation on a Mineral Safeguarding Area
- Nil requirement for provision of affordable housing in Dover Town

Response:

The Council’s Minerals Assessment of Reg19 sites addressed this, concluding that minerals extraction in this area would not be likely to be practical and the area of development does not extend to the beach. The nil affordable housing provision in Dover is responded to at SP5.

Additional Modification AM32 clarifies site boundary and requirement for high quality design on this site.



SAP4: Dover Western Heights

6 representations have been received from the following consultees:

259 Kent Downs AONB Unit	824 DDC
981 KCC	1077 Dover and Deal Green Party
1180 Historic England	1544 Walmer Town Council

Support

- 824 supports the allocation of SAP4
- 1077 and 1544 support the redevelopment of brownfield land

Support with Modifications:

- 259 advises that the wording at criterion a) combined with NE2 provide appropriate mitigation for AONB impacts.
- 981 supports the heritage conservation aspects and recommends reference to PROW network and the resourcing and delivery of a masterplan and action plan.
- 1180 supports with suggested modifications to policy criteria and site name.

Additional Modification AM33 removes 'Citadel' and scheduled monument title from site name to give focus on Western Heights site as a whole and adds reference to PROW network.

Issue: Affordable Housing:

- 1077 and 1544 object to the nil requirement for provision of affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5.

SAP5: Fort Burgoyne, Dover

8 representations have been received from the following consultees:

260 Kent Downs AONB Unit	310 Sport England
353 Kent Wildlife Trust	447 The Land Trust
1078 Dover and Deal Green Party	1183 Historic England
1503 Environment Agency	1545 Walmer Town Council

Support:

- 259 advises that the wording at criterion a) combined with NE2 provide appropriate mitigation for AONB impacts
- 447 supports the allocation of SAP5 for accommodating new uses, subject to the removal of criteria h) and j) which are impractical/not necessary
- 1078 and 1545 support the redevelopment of brownfield land

Issues:

- 310 recommends the policy wording to be made clearer that any proposals affecting the recreation ground should accord with PM4 and Sport England's Playing Field Policy.
- 353 objects to the inclusion of the site as it is a hibernation site for bats, seven species of which are priority species



- 1078 and 1545 object to the nil requirement for provision of affordable housing in Dover Town
- 1183 supports the allocation subject to greater emphasis on desirability of delivering heritage benefits, wider definition of mixed use and acknowledgement of the challenges of accommodating new uses within scheduled structures. Identify need for parking and/or sustainable transport measures.
- 1503 advises that the EA has not been notified that the site is contaminated land

Response:

Species and habitats surveys are addressed at criteria f) of the policy. The nil affordable housing provision in Dover has been responded to at SP5. Reference to contaminated land has been altered

Additional Modifications AM34 and AM35 clarify need for heritage benefits and need to accord with Policy PM4 and Sport England Playing Field Policy.

SAP6: Dover Mid Town

5 representations have been received from the following consultees:

311 Sport England	1188 Historic England
852 DDC	1546 Walmer Town Council
1079 Dover and Deal Green Party	

Support:

852 supports the allocation. 1079 and 1546 support the redevelopment of brownfield sites

Issues:

- 311 advises that any proposals affecting the bowling green should be assessed in accordance with NPPF para 99 and policy PM4
- 1079 and 1546 object to the nil requirement for provision of affordable housing in Dover Town
- 1188 welcomes in principle the site’s redevelopment, but advises that the policy should refer to the possible need for a detailed views analysis to understand where development could, through scale, impact on heritage assets some distance from the site.

Response:

The nil affordable housing provision in Dover has been responded to at SP5.

Additional Modification AM36 clarifies that proposals affecting the bowling green should be assessed against the policy requirements of PM4 and the NPPF.

SAP7: Bench Street Dover

5 representations have been received from the following consultees:

610 CPRE Kent	857 DDC
1080 Dover and Deal Green Party	1191 Historic England
1547 Walmer Town Council	



Support:

- 857 supports the site’s allocation, as it is the focus area of DDC’s Levelling Up funding application and Future High Street Fund projects
- 1191 supports subject to suggested modifications relating to heritage and design
- 1080 and 1547 support the redevelopment of brownfield land

Issues:

- 610 is concerned that a transport assessment, assessment of air quality, noise, vibration and light pollution should be addressed prior to allocating the site
- 1080 and 1547 object to the nil requirement for provision of affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5. Proportionate transport and air quality assessments form part of the evidence base for the plan.

Additional Modification AM37 confirms the need for design to be of high quality.

SAP8: Land Adjacent to the Gas Holder, Coombe Valley Road, Dover

4 representations have been received from the following consultees:

656 The Dover Society	982 Kent County Council
1081 Dover and Deal Green Party	1548 Walmer Town Council

Support:

1081 and 1548 support the redevelopment of brownfield land

Issues:

- 656 raises concern about the cumulative impact of SAP8 and SAP9 on existing traffic problems in Coombe Valley Road
- 982 requests reference to improvements to EBX16 link to the school within policy
- 1081 and 1548 object to the nil requirement for provision of affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5.

SAP9: Land at Barwick Road Industrial Estate, Coombe Valley, Dover

5 representations have been received from the following consultees:

261 Kent Downs AONB Unit	659 The Dover Society
983 KCC	1082 Dover and Deal Green Party
1549 Walmer Town Council	

Support:

1082 and 1549 support the redevelopment of brownfield land



Issues:

- 261 suggests additional modification to the description of the site’s location in relation to the AONB
- 983 requests improvements to bridleway EB16 within policy
- 1082 and 1549 object to the nil requirement for provision of affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5. Other comments noted

Additional Modification AM38 clarifies the location of part of the site in the Kent Downs AONB.

SAP10: Buckland Paper Mill, Crabble Hill Dover

3 representations have been received from the following consultees:

224 Homes England	1083 Dover and Deal Green Party
1581 Walmer Town Council	

Support:

- 224 supports the site’s allocation
- 1083 and 1581 support the redevelopment of brownfield land

Issue:

- 1083 and 1581 object to the nil requirement for provision of affordable housing in Dover Town

Response: *The nil affordable housing provision in Dover has been responded to at SP5*

SAP11: Westmount College, Folkestone Road, Dover

3 representations have been received from the following consultees:

984 KCC	1084 Dover and Deal Green Party
1583 Walmer Town Council	

Support:

1084 and 1583 support the redevelopment of brownfield land

Issues:

- 984 requests reference to improvements to EBX4 within the policy
- 1084 and 1583 object to the nil requirement for provision of affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5. Comments noted.



SAP12 Charlton Shopping Centre, High Street Dover

2 representations have been received from the following consultees

1085 Dover and Deal Green Party	1585 Walmer Town Council
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Support:

1085 and 1585 support the redevelopment of brownfield land

Issue:

- 1085 and 1585 object to the nil requirement for affordable housing in Dover Town

Response:

The nil affordable housing provision in Dover has been responded to at SP5. Comments noted.

SAP13: Dover Small Housing Sites

10 representations have been received from the following consultees

218 Jarvis Land South East Ltd	988 KCC
262 Kent Downs AONB Unit	1086 Dover and Deal Green Party
550 Hobbs Parker	1529, 1531 - Rachel Collins DDC
844 Plainview Planning Ltd	1586 Walmer Town Council
859 Christopher Townend DDC	

Support:

- 859 supports the allocation of DOV019
- 1529 supports the allocation of DOV006
- 1531 supports the allocation of TC4S027
- 1086 and 1586 support the redevelopment of brownfield land

Issues:

- 218 requests the site policy for DOV030 be modified to allow for residential development of houses or flats as per pre-app advice dated 2019. This would require increasing proposed unit numbers.
- 262 advises that outline permission has now been granted for 5 dwellings on DOV006
- 550 advises that outline permission has been granted for DOV008 with a RM application expected within 3 years
- 988 requests the Local Plan to allow for the investigation and upgrading of EB6, EB7 & EB17 to bridleways to link to EB16 and provide a pedestrian and cycle network via development sites in Coombe Valley
 - 1086 and 1586 object to the nil requirement for provision of affordable housing in Dover Town

Response:

Comments noted. DOV006 and DOV008 now have planning permission

Additional Modification AM44 updates text to include reference to PROW network.



Deal Site Allocations

Introduction To Deal Allocations:

28 Representations have been received from the following consultees:

444 Peter Jull	1587 Sunningdale House Ltd
731 Richborough Estates	1702 Paul Gamble
822 PDR Planning	1725 Ripple Farms
947 Deal and Walmer Chamber of Trade	1730 Private Landowner (Iceni Projects)
1162/1376 Lance Austin	1782 Quinn Estates (Clague Architects)
1240 Kent Planning Consultancy	1786 Kent Salads
1215/1227 Gladman Developments	1886 Tony and Valerie Armitage
1291 Persimmon Homes	1915/1924 Quinn Estates (Iceni Projects)
1333 Betteshanger Country Park	1977 Neil Oldfield
1334 The SEAHIVE	2014 Paul Dawkins
1379/1380/1381/1382/1383 Kingsley-Smith Solicitors LLP	

Issue: Highways and Infrastructure

- London Road/Manor Rd Roundabout is operating above capacity with no possible mitigation. The North Deal Access road should be pursued by KCC and DDC and set out in SP12 and Deal policies
- Bus services in this area have collapsed
- Infrastructure concerns for whole area. Also questions around contributions process and monitoring of developments and infrastructure delivery
- Beach access and paths on beaches and specifically between Deal and Walmer Castle are required
- The Deal/Walmer road system will not cope if permission is given for anymore developments. Congestion caused by over-development along the Dover Road from Ringwould into Deal will result in traffic queues. June 2020 Deal Town Council report requires pavements, cycle lanes, wide roads and detailed junction plans.

Response:

See responses on pages 55 and 56 at beginning of Site Allocation Policies section of this report in relation to highways and bus services.

The site policies in Deal area set out the specific requirements in relation to highway mitigation, as advised by KCC. The North Deal access road mitigation was explored early in the plan making process and the outcome of that modelling and feasibility work is set out in the IDP.

Issue: Settlement confines and Policies Map

- Extant consent for DEA020 should be acknowledged in the Local Plan and shown on settlement confines/ and or policies map.



Response:

The policies map is part of the development plan and therefore does not include extant developments which are yet to be built which are not part of the development plan. The settlement confines relate to built development only and will be revised over the plan period to reflect developments as they are built out. Officers would take under construction and newly built development into consideration when making assessments relating to confines.

SAP14: Land off Cross Road, Deal:

10 Representations have been received from the following consultees:

9 David Hawkes	1087 Dover and Deal Green Party
13 Martin Brandon	1185/1225 Gladman Developments
22 Peter Jull	1590 Walmer Town Council
48 Jeremy Swallow	1878 Mr and Mrs Armitage
611 CPRE Kent	1889 Rosemary Anne Holmes

Support:

Supporting representations from land promoter.

Issues:

- Site has history of planning refusals including relating to landscape and character, drainage, highways and non-policy compliance.
- Open views from public footpaths
- Masterplan should be required
- Highway access / road network is not suitable
- Agricultural land loss
- Flooding / surface water issues
- There are other, more suitable sites in the settlement (see omission sites)
- Supports exclusion of RIP001

Response:

Previous planning history is taken into account as part of the site assessment process and future planning decisions. There are ongoing applications in this location, and updated information on this will be provided as part of the Examination.

See responses on pages 55 and 56 at beginning of Site Allocation Policies section of this summary report in relation to highways and other matters.

SAP15: Land at Rays Bottom, Walmer

65 Representations have been received from the following consultees:

57 Jeremy Swallow	887 Sophie Peach
69 Elizabeth Zdziebko	895/897 Alexa Childs
282 Russell Thompson	954 Anne Ballinger
332 Kingsley-Smith Solicitors LLP	1011 Noelle Graal
351/1211 Lance Austin	1014 Robert Hogben
364 Angela Shrimpton	1088 Dover and Deal Green Party
387 Amanda Clarke	1319 Don Hough



407 Vanessa Broughton	1399 James Collins
418 Andrew Lawrence	1400 Graham Collins
420 Val Swallow	1591 John Lonsdale
432 Russell Thompson	1636 Aaron Snow
441 Hawkesdown Estate (Walmer) Ltd	1667 Simon Jefferson
445 Sally Corrigan	1758 Alan and Sarah Gleave
488 Helen Williams	1760 Dennis Hill
522 Dr Sharon Danby	1767 Victoria Hughes
532 Tony Stickels	1796 Simon Pollard
533 Dan Hough	1808 Alan Nash
535 Monica Hough	1817 Carolyn Barber
542 Sarah Waite-Gleave	1821 Mr and Mrs Butt
612 CPRE Kent	1832 Claudia Carr
624 Catherine Stone	1842 Marion Osborne
704 Janice Garrett	1847 Cindy Crancher
706 Roger Highton	1870 Vanessa Clift
728 Suzanne De Ruyter	1872 Suzanne Mulvaney
735 Yvonne Horton	1879 Mr and Mrs Armitage
736 Simon Darragh	1890 Rosemary Anne Holmes
737 Michael Brimson	1900 Jenifer Wakelyn
743 Lorely Brimson	1933 Deborah Moggach
837 Dr Phil Peach	1972 Kingsdown Conservation Group (Henry Plaice)
851 Fernham Homes Ltd	1973 Kingsdown Conservation Group (Patricia Barrington)
867 Robert Hogben	2020 Jenny Mills
873 Daniel Couzens	

Support with Amendments:

Site promoter supports allocation and proposes increase in indicative capacity to 80 units.

Group representation:

A group representation of 10 signatories was submitted objecting to this allocation (332)

Issues:

- Site was rejected in previous plans
- Incompatible with SP4 and other LP policies
- Highways cannot cope / rural roads / Access too narrow / blind corner / no pavements.
- Highways assessments are not accurate – Liverpool Road is a single lane.
- Wording of ‘Where possible’ in policy is uncertain with regards to highway mitigation
- Density proposed does not reflect character and is too high / Coalescence concerns
- Flooding / surface water / drainage Issues. Site contains an old river which is still active.
- Environmental, landscape and biodiversity concerns. Site within BOA and adjacent to AONB.
- Loss of Agricultural / arable land / farmland - this is not brownfield land
- Heritage impacts & Walmer Castle proximity.
- Local Infrastructure cannot meet demands / No public transport
- No employment proposed
- There are other more suitable sites in the settlement



- The Plan mis-names Hawkshill Freedown, which is in fact globally rare, chalk-downland habitat, (not just the ‘open field’ in the DDC text)
- The Freedown included an WW1 airfield, integral part of landscape, gateway to Walmer and Deal. Separates Walmer and Deal. Irreplaceable ecological value, functionally linked to SPA.

Response:

Site planning history has been taken into consideration. SAP15 Policy addresses all issues raised in relation to density, landscape, ecology designations, flooding and drainage, and requires heritage assessments.

The Freedown has been correctly named in accordance with the Council’s evidence base.

For response to adequacy of infrastructure and highways and bus services changes please see response on pages 55 and 56 of this report.

Note: Several representations made here raised the matter of the consultation process being too complex and structured to make it difficult for average person to respond. See Introduction section for a response on this issue.

SAP16: Deal Small Housing Sites

18 Representations have been received from the following consultees:

23 / 24 Peter Jull	1324 / 1325 / 1412 William Hickson
87 Lynn French	1386 /1387 / 1410 Mr P & Mrs S Laflin & Rubix Estates
113 Martin Brandon	1506 Environment Agency
233 John Samuel	1532 DDC Housing Department
313 Sport England	1568 Kentish Projects
519 Tracey Wilkins	1593 Walmer Town Council (John Lonsdale)
989 KCC	

GTM003 – Land east of Northbourne Road, Great Mongeham

Support with Amendments:

- Landowner Support but wish to Increase the area of the allocated area to include the parcel of the Site to the south of the Site and increase capacity from 10 to 30 units.
- Site undeliverable as proposed and should be increased to 38 units.

Other Issues:

- Site criteria should be amended to read “... individual vehicle access ...”, and “... street frontage without a parallel vehicle access between houses and Northbourne Road, parking being provided from the rear.”
- The internal road layout should provide access to GTM011 to avoid traffic from that site which now has Part Q permission
- Require appropriate herpitile and/or biodiversity survey is carried out before the site is disturbed.
- The County Council recommends that policy specifically references improvements to Public Footpath ED49.



Response:

Internal road layout for a site of this size is not usually set in policy. These issues are matters which should be addressed at planning application stage. Ecological surveys will be required in accordance with the relevant policies.

Additional Modification AM46 provides for linkage to the PROW network.

TC4S008 – Bridleway Riding School, Deal

Support:

- Landowner Support for the inclusion however would like it to be recognised that the indicative housing capacity of 25 may be exceeded and a "Maximum" should not be set at this time.

Issues:

- The width of Station Road between Cross Road and Sydney Road should be widened to at least 6m and a full width pavement provided on at least one side.
- Require the site to be developed in conjunction with the surrounding field by providing a single access point.
- Site previously assessed as 'unsuitable'
- Traffic on railway bridge is not acceptable. If site remains, strengthen requirements.
- Riding is a sport use and loss of which should be assessed in accordance with NPPF.

Response:

'Indicative' does not give a maximum threshold. Site planning history has been taken into consideration and assessment process is iterative and reflects the most up to date information and national position.

The riding school is ancillary to a private dwelling. Sports England guidance and national policy does not require protection of private equestrian facilities.

See responses on page 55 at beginning of Site Allocation Policies section of this summary report in relation to highways concerns.

TC4S032 – Ethelbert Road, Deal

Support:

- DDC Housing, as landowner, support the allocation of this site.

Issue:

- Site within FZ3a.

Response:

An updated SFRA - Sequential and Exception Test Summary and Review Note was published in 2022 which assessed FZ3 issue. The conclusion was: The three sites located within Flood Zone 3 have been considered due to their sustainable location within, or partially within the settlements of Deal and Sandwich and their low levels of impact on other planning matters. Further, Ethelbert Road and



Sandwich Industrial Estate are both brownfield sites and 104 North Wall Road is partially brownfield, and the redevelopment of these sites provides the potential for regeneration in those locations.

Of the sites considered in Flood Zone 3 the following will need to be subject to the exceptions test: TC4S032 and TC4S047. This is addressed within policy.

TC4S047 – 104 Northwall Road, Deal

Support:

- Landowner support

Issues:

- Site within FZ3a.
- Site adjacent promoted as an extension to this allocation (Omission Site)

Response:

See above response to TC4S032 in relation to FZ3a.

Sandwich Site Allocations

Introduction to Sandwich Site Allocations:

9 Representations have been received from the following consultees:

493 Finns on behalf of Sunnyside Nurseries	990 Kent County Council
543 Mr A Binskin	1004 Catesby Estates
580/753/763 Terence Hopper	1502 Hume Planning on behalf of Easton Builders
975 CPRE Kent	

Issue: Sandwich Town Council comments

Sandwich Town Council representations on the site allocations in Sandwich (detailed within the tables in each Site Allocation Policy below) are also relevant to the settlement as a whole and/or all sites and therefore some of these matters are summarised in this introduction section to avoid duplication. Summary of comments below are taken from Rep numbers SDLP: 1570, 1572, 1573, 1574, 1575, 1576, 1577.

- Details of road layout, construction materials and adoption of road by KCC Highways must be included within policies;
- Bridge over river Delf requires consideration;
- 20mph restriction should commence at school;
- Local Highway mitigation must be provided within settlement;
- Loss of existing on-street parking must be placed on new sites;
- Watercourse maintenance should be required;
- Retention of all trees and hedgerows and suitable screening must be included;
- All sites have need for full archaeological surveys, not desktop ones;
- All properties should have electric charging points, full fibre, accessibility for cycling and pedestrians with dropped kerbs also and be 50 year flood risk compliant;



- Section 106 funding should be directed towards improving and updating existing essential services;
- Street lighting to meet certain requirements in relation to wattage and heritage design;
- 65% of affordable housing should be rental accommodation, social or council houses;
- A Design Code for Sandwich should be undertaken.

Response:

Adoption of roads is covered in Local Plan paragraph 10.16. Details of layout and design is a matter to be addressed as part of individual planning applications, the design and other policies within this plan will be applied as relevant. Policy PM1 in particular will address the design code and other specific locational design requirements.

Matters such as lighting, watercourse maintenance, Fibre etc. are covered by other legislation.

Policy SP11 and other related TI and PM policies address local infrastructure requirements, cycling and walking and specific projects are set out within the IDP.

See responses on pages 55 and 56 at beginning of Site Allocation Policies section of this summary report in relation to highways and other matters.

Issue: School Expansion:

- The County Council welcome the inclusion of policy SAP21 to safeguard land adjacent to Sandwich Technology School. It should also be noted by the District Council that land may be required for primary school expansion in Sandwich.

Issue: Inaccurate Evidence:

- Inaccurate information in the Plan and evidence about the settlement and site appraisal / selection process.

Issue: PROW

- The issue of PROW ES3 link to / Sandwich bridge due to river erosion should be acknowledged by the District Council as there is danger that access to coast, England Coast Path, and a direct link out of Sandwich will be lost.

Response:

Support for education land safeguarding noted.

Factual errors related to the HELAA will be addressed within a HELAA Errata where these are confirmed.

It is considered this PROW/Bridge erosion issue would be better related to the IDP as it does not appear to be site specific to individual allocations. ROWIP is covered by TI1 and TI2. National trail is preservation modification proposed – see below.

Additional Modification AM47 adds reference to the national trail England Coast Path to Policy SAP17.



SAP17: Land South of Stonar Lake, Sandwich

6 Representations have been received from the following consultees:

613 CPRE Kent	1507 Environment Agency
755 Terence Hopper	1570 Sandwich Town Council
911 Heather Green	1851 Nexus Planning on behalf of RAMAC Holdings

Support:

- Support allocation of brownfield site close to Town Centre
- Landowner/site promoter support with additional information submitted

Issue: Flood Risk

- Site is at risk of flooding falling entirely within FZ 2 and 3 and close to the river Stour.

Response:

An updated SFRA - Sequential and Exception Test Summary and Review Note was published in 2022. The conclusion was: The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency’s recommended additional freeboard requirements where practicable. Appropriate wording is included within the policy criterion d.

Other Issues:

- Existing employment site and allocation will erode employment opportunities.
- Access on Ramsgate Rd or Stonar Road requires further audit
- Site has been vacant for some time and biodiversity requires assessment. Also impacts on Monks Wall Nature Reserve require consideration.
- Traffic concerns with A257 and on toll bridge into town

Response:

Comments noted. Biodiversity issue addressed by policy criterion.

SAP18: Sandwich Highway Depot

5 Representations have been received from the following consultees:

530 Jill Griffiths	913 Heather Green
614 CPRE Kent	1572 Sandwich Town Council
756 Terence Hopper	

Issue: Site Design and Specific Requirements:

- The site is located close to the conservation area with its high housing density. It is visible from an important entrance road into the town and is therefore an opportunity to make a



statement about the town and policy should be more specific about this and the high design standards needed.

- As this site is in public ownership it should be used as an opportunity to produce an exemplar development, displaying a high-quality design featuring cutting edge technology for energy and water conservation, including the production of car ownership and high-quality pedestrian and cycling links into the town centre.
- There is an opportunity to include public parking / coach parking (as previously promised) on this site. Proximity to Sandwich Infant School and recommended parking for parents (Gazen Salts Car Park) should also be considered.
- Emergency access priority should be considered with the adjacent fire station, affording free movement for emergency vehicles. The access route to the town via the Cricket Club should be managed in conjunction with the Club.
- Current green areas should be retained, current built footprint should remain.
- Several representations contain suggested policy wording changes to include requirements for starter homes, and specific design criteria in relation to housing mix and storey heights, landscaping, parking and pedestrian links.

Response:

Detailed design of the site will be considered at the time of the application against other policies in this Local Plan such as those within Placemaking and design, parking and sustainable travel. Access points and transport issues have been addressed with the Local Highway Authority.

Issue: Constraints:

- Flood risk.
- HELAA indicates landscape and highway impacts / Traffic issues on A257
- Insufficient infrastructure

Response:

The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. Policy criterion addresses this issue.

Please see responses on pages 55 and 56 at the beginning of this Section addressing infrastructure matters.

SAP19: Land at Poplar Meadow, Sandwich

3 Representations have been received from the following consultees:

651 Terence Hopper	653 Walsingham Planning on behalf of LIDL Great Britain
1573 Sandwich Town Council	



Issue: Convenience Retail Store:

- Objection on the basis that allocation does not allow make provision for convenience retail despite having been previously granted permission for this use and still being needed

Response:

The landowner submitted this site for housing and not retail as part of the call for sites/HELAA process.

Issue: Previous Assessment and Refusals:

- There have been no significant changes that would alter the reasons for rejecting this site in the previous Land Allocation exercise (2013) exercise and the subsequent appeals process.

Issue: Design:

- The road alterations that were previously agreed (when the site was approved for a supermarket) should be integrated into the plan;
- the proposed dwellings must be of a visual appearance and finishing materials in keeping with the surroundings;
- Further consideration must be given to traverse the pavement, proximity to bus stop, road junction and railway crossing and onto a busy main road.

Response:

Detailed design of the site will be considered at the time of the application against other policies in this Local Plan such as those within Placemaking and design, parking and sustainable travel. Access points and transport issues have been addressed with the Local Highway Authority.

SAP20: Wood’s Yard, rear of 17 Woodnesborough Road, Sandwich

4 Representations have been received from the following consultees:

400 John Elvridge Planning Consultancy	759 Terence Hopper
615 CPRE Kent	1574 Sandwich Town Council

Support:

- Site promoter supports allocation and suggests may be brought forward earlier than in the Housing Trajectory.
- Support allocation – will improve appearance of land

Issue: Constraints

- Flood risk
- Landscape and Highways (HELAA assessment shows site as orange)
- Overall scale of development in settlement will impact historic town
- Insufficient Infrastructure
- Loss of employment land



Response:

Comments noted. Please see responses on pages 55 and 56 at beginning of this section on infrastructure and highways matters.

Other Issues:

- Propose reduction in capacity to 25 homes
- Disputed ownership of the access road must be resolved and KCC highways adopt access road.
- Consideration must be given to the proximity to the railway crossing and tracks.
- Proximity to the town wall (Rope Walk to The Butts) should be considered as one of the main travel routes for children attending the Infant School.
- Road junction improvements / close proximity of rail crossing and large vehicles accessing the adjacent leisure park and large vehicles making deliveries to the town (ie the Co-Op)

Response:

Detailed design of the site will be considered at the time of the application against other policies in this Local Plan such as those within Placemaking and design, parking and sustainable travel. Access points and transport issues have been addressed with the Local Highway Authority.

SAP21: Land adjacent Sandwich Technology School, Deal Rd, Sandwich

22 Representations have been received from the following consultees:

358 Ian Black	1771 Sandra and Stuart Jones
608, 699, 764, 820, 928 Terence Hopper	2003 Bob Brewin
712, 715 DHA Planning on behalf of Catesby Estates	2004 Helen Conn
856 Terence Hopper	2013 Jenny Gates
1397 Martin Coleman	2015 Avril Gray
1575 Sandwich Town Council	2023 Harriet Page
1701 Roy and Tess Elliot	2024 Peter Pound
1744 Lynn Davis Architects on behalf of Club Sandwich	2025 Sheila Pound
1768 Hazel and Alan Robinson	

Group representation:

- A group representation with 265 signatures was submitted objecting to this allocation (856)
- A group representation with 47 signatures was submitted objecting to this allocation (1744)

Issue: Safeguarded Land – Change from Leisure to Education Use:

- The previous (2010) site allocation safeguarded land for an extension to neighbouring Leisure Facilities.
- Many representations object to the change in this site allocation in relation to this safeguarded land from leisure use to education. Comments include (summarised):



- No public consultation on the removal of safeguarded land for leisure, including with school, TC and trustees of land or 'Club Sandwich' (formerly SSLCT who ran the Leisure Centre prior to 2021). DDC, School and KCC have excluded other parties from the discussions.
- DDC, through Pre-app engagement supported extension to leisure centre previously.
- Evidence does not support the change of safeguarded land use. Indoor Sports facility Strategy does not remove the requirement and consultation on this document was not held properly.
- Contrary to other policies in LP in relation to leisure and sports (PM policies)
- Detrimental to community – loss of important sports land used by the public

Response:

The position change with regards to the safeguarded land for the Leisure Centre in site policy SAP21 is based on several factors. Firstly, through an update to the Indoor Sport Facility Strategy 2022 (ISFS) which does not recommend that an extension to the Leisure Centre is required in Sandwich at this time and it is not supported by the current operators of the facility (Sandwich Technology School) and therefore the evidence to support inclusion of the safeguarding of the land for a sport use in the Local Plan it not considered to be justified as there is no evidential basis for its inclusion.

'Club Sandwich' are no longer the operator of the Leisure Centre facility, and therefore delivery of an extension to services there would need to be in liaison with the current operators. DDC have however, remained in contact with Club Sandwich on this matter through email communications during 2022 where the evidence change was explained. They were also invited to comment on the ISFS during production. The ISFS was available for public consultation for several months and all comments were taken into consideration, no comments were excluded or rejected.

Secondly, recent communication KCC Education who identified a need for additional land for secondary school expansion in this location. This information and evidential update is set out in the Infrastructure Delivery Plan 2022 in the Education section which was available for public consultation alongside the Local Plan. Note support from KCC Education Authority (990) made above in relation to the support for the school expansion and safeguarded land in SAP21.

In addition, DDC received a representation from the land promoter during the Regulation 18 consultation which set out an objection to part of the land being safeguarded for Leisure/Sport use, and instead proposed an increase of residential units to 85 (DLP856).

Issue: Education Land Safeguarding and Site capacity

- Delivery is burdened with site for school. Viability is an issue and a price for the land will need to be agreed with KCC (not nil cost).
- Alternatively, a flexible approach to affordable housing /tenure mix required.
- There is another site to the south-east which may be suitable for the school.
- Supporting text should be amended to reflect 1ha land set aside for the school.
- Increase housing capacity to 60 units – as previous allocation. The surface water flooding issue raised which reduces capacity is not accurate/ suitable drainage solutions can be found.

Response:

The requirement for secondary school expansion and wording of the policy has been agreed with KCC Education and is supported by them. The site remains the most suitable location for expansion of the

secondary school and has been confirmed as available through the call for sites process. The reduction in capacity of the allocation from 60 units to indicative of 40 units is not related to the change of the safeguarded land from leisure use to education use, it was made in response to updated SFRA information and surface water flood risk on the site. The site area to be safeguarded for leisure was not explicit within current Policy LA17, but a development brief for the whole site was to precede a planning application.

The wording of the current policy is already considered to be flexible and effective in regard to the size required for the school at '1-2ha' and the more detailed assessment of surface water flooding to determine final capacity which could be higher than 'indicative' 40 units:

'The final capacity of the site shall be informed the site-specific flood risk assessment, with the need to avoid areas at risk of surface water flooding, and the land needed school expansion has been finalised'.

With regards to the nil cost transfer and viability of the site, the current LALP allocation made clear that the site was not allocated solely for residential land use and therefore the land values of this current agricultural field should reflect that position, and this emerging policy position. It is considered a reasonable approach that the proposed exemption from significant secondary education contributions in lieu of transferring the land at nil cost would address any viability concerns. However, Policy SP11 allows for a viability case to be made at application stage.

Other issues:

- Typing error in b, there will be more than one access point into the Site, in accordance with criterion c). The Site is completely boarded by hedgerow and thus it is essential the criterion recognises that more than one access is required and thus more than one section of hedge may need to be removed to facilitate the additional cycle pedestrian links;
- Criterion h) must be amended to recognise that only other relevant site allocations need to be considered as part of the Transport Assessment, the scope of which will be determined by the local highway authority.
- New Criterion should be added to clarify that the respective school and residential elements of the allocation should address their respective drainage and BNG requirements respectively, unless otherwise agreed. Due to the constrained nature of the Sites, this should also recognise the potential to deliver BNG off-site.
- The hedge along Deal Road should be retained to screen the site. The entrance/exit should be on Deal Road, and Deal Road should be reduced to a 30mph speed limit (currently 40mph), this reduction should also continue outside Sandwich Technology School. Mini roundabout should be introduced to manage traffic speed due to heavy traffic use entering the town and accessing the schools.
- The site should also include a temporary parking provision that could be for school traffic for drop off/pick up times to discourage parking on Dover Road.
- The heritage data is wrong, there are 3 listed properties directly adjacent.
- There is an existing irrigation main across the site that needs to be investigated and considered.

Response:

BNG policy NE1 will address those specific issues in relation to delivery. Criterion in relation to highways and parking has been agreed with the Local Highway Authority.



Additional Modification AM49 corrects typing error in criterion b and clarification added to criterion i with regard to the education contributions in lieu of land transfer, detail of which has been agreed with KCC Education.

SAP22: Land at Archers Low Farm, St Georges Road, Sandwich

16 Representations have been received from the following consultees:

202/204/205 Edith Gilbert	890 Constantinos Sarafoglou
203 Colin Watson	894 Richard Parkinson
357 Kim Verrier	1089 Dover and Deal Green Party
616 CPRE Kent	1576 Sandwich Town Council
761 Terence Hopper	1598 Walmer Town Council
845 DHA Planning on behalf of Fernham homes Ltd & Walker Residential Ltd	1955 Janette Ludd
868 Sandwich Residents Group	2042 Malcolm Sim

Support:

- Support allocation and request increase in capacity to 40-45 dwellings

Group representation:

- A group representation with 1,037 signatures was submitted objecting to this allocation (868)

Issue: Constraints:

- Landscape Impacts – Site has been recently (and previously) refused planning permission on landscape grounds – supported by Inspector in appeal of 2014.
- Site was also removed from LALP as allocation in 2013 on same grounds.
- Biodiversity Impacts – Trees (some ancient and TPO) / woodlands and irreplaceable habitats on site
- Flood Risk
- Local highways, access and parking not acceptable – safety concerns
- Loss of vital green belt around town and loss of farmland / Grade 1 land
- Impact on local character and appearance
- Lack of infrastructure
- Scale and impact on historic settlement
- Consideration to TPOs
- Consideration of Traffic on St Georges Road and Sandown Road

Response:

Please see responses on pages 55 and 56 to infrastructure and highway concerns at the beginning of this Section.

Recent appeal decision refused development at this site due to landscape impact along Sandown Road (Application for 44 homes 21/00274). This policy has a reduced indicative capacity of 35 dwellings, together with the specific requirements included of this policy in relation to landscape and trees are considered to create appropriate mitigation to the issues raised by that application.



However. Policy will be updated to add a specific additional requirement that the layout should be informed by a Landscape and Visual Impact Assessment.

Additional Modification AM50 confirms in criterion d that the layout should be informed by a Landscape and Visual Impact Assessment.

SAP23: Sydney Nursery, Dover Road, Sandwich

6 Representations have been received from the following consultees:

221 Jarvis Land South East Ltd	676 Terence Hopper
312 Debbie Kent	1577 Sandwich Town Council
531 Finns on behalf of The Roses Beneficiaries Association	1923 Aspire LLP - Louis Wilkin

Support with Modifications:

- **Increase site size and capacity / tenure:**
 - Site should be larger site and allocated for 35 dwellings
 - Remainder of the site should allocated for development in addition to the site's Dover Road frontage, giving a site capacity of 61 units (and option of care home), including a new access from Deal Road, enabling development adjacent to Sandwich Technology School
 - Proposal for 70 bed care home on the site with housing and highway improvements

- **Other Issues:**
 - Agree in principle – with proposed policy wording amendments relating to the access and left in/left out junction arrangements from A256 and reconstruction of roundabout at the junction of Dover Rd/ Deal Rd and additional consideration to nearby woodland and biodiversity
 - Comment that only part of SAN010 has planning permission and remainder of site should be allocated alongside whole of SAN019. SAN010 currently shown as wholly having PP and SAN019 is split for suitability and allocation

Response:

As part of the Local Plan preparation, all potential sites were assessed to determine their specific impacts and potential cumulative effects on the road network. Where it is considered that mitigation was required (in consultation with Kent Highways), this is identified within site specific policies and the Infrastructure Delivery Plan (IDP) which supports the Local Plan.

Where the impacts of development were considered to be 'severe' and there were no deliverable options for mitigation, sites were considered unacceptable. As part of a planning application, developers will need to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable transport options. This will need to address issues identified in the Local Plan policies and the IDP. KCC Highways will review this and determine whether the traffic generated from a scheme creates an issue that requires resolution through the provision of local road and/or footpath and cycle path improvements. If off-site improvements are needed, then the developer may enter into a separate legal agreement with KCC Highways.



Site is allocated for market housing as submitted as part of the Local Plan process. Mix and housing type can be addressed at planning application stage and assessed against other policies in this plan and current evidence of need. Detailed design of the site will be considered at the time of the application against other policies in this Local Plan such as those within Placemaking and design, parking and sustainable travel. Access points and transport issues have been addressed with the Local Highway Authority.

Aylesham Site Allocations

Introduction to Aylesham Allocations:

22 Representations have been received from the following consultees:

85 Mrs Burnett and A Burnett	1254 /1258 Burnett Planning on behalf of Dean Lewis Estates
88 Mandy Gass	1522 Hume Planning on behalf of Kavanagh Motor Services Ltd
136 Womenswold Parish Council	1565 Hume Planning on behalf of KCC
161 / 162 Aylesham Parish Council	1679 Mandy Gass
213 Sara Garrity	1692 Clare Marsh
496 Peter Jull	1824 Delia Webb
808 John Garcia-Rodriguez	1904 Mr and Mrs Young
853 Nonington Parish Council	2006 Joyce Dalton
959 Sharon Danby	2011 Janet Gambrell
1202 James Blomfield	2029 Marilyn Lewis

(Note that some representations made on site specific policies in the sections below also include general views about the overall settlement and all allocations and have been reflected in this commentary)

Issue: Aylesham North Reg 18 Site Allocation Removal:

- Support and objection for removal of Aylesham North proposed allocation for 500 homes which was included within Reg 18 plan
- Objection to removal of Aylesham North site allocation - concerns updated HELAA is not an accurate appraisal and other evidence to support the removal, such as Highways, is flawed.

Response:

The evidence from the Local Highway Authority was taken into consideration and the site AYLO04 was removed following Regulation 18 stage due to concerns in relation to the cumulative impact upon the highways network. The AYLO03 site is considered to be the best option to deliver the further expansion to Aylesham due to its relationship with the existing settlement, proximity to transport connections and services and facilities, and the development is considered to have a lesser impact on the amenity of existing residents.

Other issues:

- Aylesham population has almost trebled over last 6 years
- Infrastructure cannot cope with current population – Infrastructure promised from previous development has not yet been provided.
- Concern of lack of secondary school and travel to other areas and lack of early years provision.



- Concerns that other Rural Service Centres (Sandwich) receive more investment in services but Aylesham will grow larger.
- Rural area / AONB will be impacted
- Local highway improvements are needed – several junctions/areas mentioned
- Flooding (Junction of Dorman Avenue mentioned)
- Comments that Aylesham should also see their cultural and heritage assets included as other settlements have (Sandwich)

Response:

See response to SP3 in relation to overall strategy. See response on pages 55 and 56 to infrastructure highways and other environmental concerns at the beginning of this Section.

Issue: Duty to Cooperate and consultation process

- There needs to be consultation with Canterbury City Council to provide a masterplan for area.
- CCC Reg 18 Plan with significant housing proposed adjacent to Aylesham was published at same time. Duty to Cooperate not met.
- Removal of Aylesham North site on highway grounds is now outdated if CCC allocation plans go forward.
- Failure of Duty to Cooperate with Town and Parish Councils

Response:

The Council has met the requirements of the Duty to Co-operate as set out in the Duty to Cooperate Statement and Statements of Common Ground with individual organisations. The Duty to Cooperate does not apply to Town and Parish Councils, however it is considered that consultation in accordance with the Statement of Community Involvement has taken place with these bodies.

Additional modifications update to reflect Canterbury Regulation 18 Draft Local Plan proposals – see SAP24 response below.

SAP24: Land to the South of Aylesham

52 Representations have been received from the following consultees:

25 Jamie Pout	797 Michael Parker
28 /337 /494 Peter Jull	826 Jill Baker
53 Janet and Keith Holness	849 Carter Jonas
59 Carter Jonas	862 Jan Gray
91 Adrian Bennett	991 KCC
134 Ian Hobson	1090 Dover and Deal Green Party
141 Womenswold Parish Council	1184 Evelyn Andrews
151 /171 /176 Aylesham Parish Council	1312 Canterbury City Council
231 Hawarden Farming	1404 Mary Cook
263 Kent Downs AONB Unit	1456 Natural England
397 Richard Rush	1537 Adisham Parish Council
414 Peter Sutcliffe	1578 Cllr Linda Keen
427 Tracey Pitcher	1599 Walmer Town Council
470 Ian Hobson	1617 Guy Steward
505 Adrian Bennett	1651 Rachel Thompson



510 Nicholas McHard	1769 Fiona Paterson
546 Womenswold Residents	1797 Christine Rotherham
578 Heather Green	1800 Maggie McKenzie
589 Bidwells on behalf of Emmanuel College	1812 Paul Luckhurst
617 CPRE Kent	1815 Marilyn Lewis
648 Patricia Berry	1823 Keith Bibby
655 Clare Delf	1826 Delia Webb
675 The Woodland Trust	2036 Karen Phillips
677 Jane Elliott	
725 Keith Berry	

Support:

- Welcomes the inclusion of reference to the PROW network
- Support changes since Reg 18.
- Landowner/Developer Support with proposed amendments (set out below)
- The inclusion of criterion (l) to manage impacts on the AONB is supported.

Support with amendments:

- The site borders the Canterbury District boundary and the draft Canterbury District Local Plan to 2045 (Regulation 18) allocates land adjacent to SAP24 for approximately 420 new homes and a new Country Park (Policy R20). It is critical that the site allocation policies in both Local Plans enable appropriate connectivity between the two sites, particularly in terms of sustainable transport and ecology

Issue: Canterbury Local Plan Links:

- Lack of co-operation with Canterbury CC re the impacts of developments either side of the district boundary
- Plan should reference joint working with CCC as unsound / not legally compliant
- Together with the CCC site, impacts on settlement will be greater

Response:

As explained in the Duty to Cooperate Statement and accompanying Statement of Common Ground with Canterbury City Council, both Councils have continued to liaise on matters of plan making and have made representations on relevant Local Plan consultations. In response to the CCC representation relating to the Aylesham development on this Local Plan, a modification has been proposed which is agreed with CCC in an updated SoCG March 2023.

Additional Modification AM51 updates the supporting text in relation to the emerging Canterbury Local Plan proposals including as part of the site masterplan.

Issue: Scale and Infrastructure:

- Government not enforcing housing targets now, and this Plan proposes houses in excess of objectively assessed need
- Development is disproportionate to the existing settlement. Aylesham has already had a lot of growth in recent years with no infrastructure provided. Specific issues around local



amenities and the levels of recent growth are detailed, including that planned infrastructure such as sports centre has not yet been delivered.

- Concerns over infrastructure capacity such as shops, services, sustainable transport methods, drainage, schools (Several comments above specifically reference lack of secondary provision and recent cuts to bus services) of Aylesham and nearby villages
- Local Highways Concerns including capacity of the network, impacts of HGVs. Specific road junctions and issues around Aylesham/Sandwich and Nonigton are highlighted.
- No parking at Train Stations and stations do not cater for needs of disabled users
- Criteria Q is unsound as list of contributions is non-exhaustive / The plan seems vague and uncertain on vital and necessary infrastructural improvements
- Policy includes positives (such as inclusion of play parks, open spaces, cycle links and protecting and enhancing wildlife) but there is a lack of firm commitments to facilities.

Response:

Please see responses to infrastructure and highway concerns on pages 55 and 56 of this report.

Issue: Housing Types

- Housing should all be social housing
- Object to removal of Gypsy and Traveller pitches and eviction of current occupants

Response:

The existing Gypsy and Traveller site is not affected by the site allocation. Housing tenure and mix is addressed through other policies in the plan.

Issue: Employment

- Lack of Jobs / High unemployment in local area
- Remove Criterion C) Remove ref to employment opportunities (not in SAP24 indicative development area)
- The development makes reference to “a new small convenience shop” which is wholly insufficient for the proposed number of new homes.

Response:

The Plan allocates land for new employment to provide new employment opportunities, including land in Aylesham. The convenience shop should be of a scale to meet the needs of the new community.

Criterion C) relates to the requirement for a convenience shop and community facilities. This is not related to employment area SAP25 allocation which is shown for information only on the plan/figure.

Additional Modifications AM52 and AM53 add clarity to Figure 4.6 relating to employment allocation and SAP25 and remove word small in relation to the convenience shop.

Issue: Environmental and Landscape Objections:

- Remove Ackholt Wood from the allocation boundary and provide a 20m buffer (policy currently asks for 15m)
- Loss of Greenfield land, AONB, land for food production. Brownfield should be used first
- Ecology impacts



- Light pollution issues
- Character of settlement will be eroded
- Flooding concerns
- Widen the landscape buffer between Snowdown and SAP 24
- Loss of area used by residents for recreation
- Area behind Ackholt House which has cesspit, trees and other obstacles to development not considered

Response:

Comments noted.

Additional Modification AM53 adjusts the buffer to ancient woodland from 15km to 20km.

Issue: Indicative Site Plan:

- Figure 4.6 - Site plan shows SAP25 Employment allocation which should be removed (849)
- Landscaping buffers should be removed from the indicative plan other than along the aforementioned line (28)

Additional Modification AM52 clarifies Figure 4.6 relating to employment allocation and SAP25.

Other Issues:

- Objection to SAP24 on the basis that it over-relies on delivery later in the Plan period. The Plan should allocate smaller sites instead.

Response:

Matter is addressed under SP3.

SAP25: Aylesham Development Area

6 Representations have been received from the following consultees:

120 Mrs Burnett and A Burnett	843 Jan Gray
142 Aurel-Levent Cioran	907 Heather Green
242 Hawarden Farming	992 KCC

Issues:

- Poor Infrastructure – needs of teenagers and secondary schools mentioned
- Need for businesses
- lack of research and presentation of the current role of the farmland, looking at rural employment food production, and current carbon capture
- landowners who farm the land alongside side the current development have ongoing issues regarding rainwater flowing down from the newly concreted areas and onto the roads / fields
- Poor road infrastructure and highway safety issues
- Canterbury plans issue and lack of DTC with CCC
- Specific mention of connection to the PROW network required.



Response:

Policy requires a site-specific flood risk assessment. See response to SAP24 in relation to Canterbury CC Duty to Cooperate issue.

Additional Modification AM54 updates criterion e in relation to PROW improvements and connections.

SAP26: Former Snowdown Colliery, Aylesham

9 Representations have been received from the following consultees:

122 Mrs Burnett and A Burnett	962 Sharon Danby
678 The Woodland Trust	993 Kent County Council
813 The Coal Authority	1231 Clare Delf
865 Jan Gray	1394 Friends of Betteshanger
909 Heather Green	

Issue: Ancient Woodland Buffer and Ecology:

- Welcomes approach taken to protecting the site in points c) and d) but concerned that no minimum buffer size is specified from ancient woodland. Suggest 50m unless applicant demonstrates otherwise
- Ecological impacts and loss of greenfield / food production land. Policy should have a requirement for full ecological survey and conservation designation

Response:

Requirement for buffer zone to protect ancient woodland and ecological matters noted.

Additional Modification AM55 adds a requirement for a minimum 50m buffer zone from ancient woodland adjacent to site and clarifies policy text in relation to ecology surveys, trees and protection of ancient woodland.

Issue: infrastructure:

- Sewerage system needs upgrading
- Lack of infrastructure generally and specifically for teenagers and businesses

Response:

Comments noted.

Issue: Highways matters

- Highway Safety including accidents and traffic on B2046.
- Highway capacity on local network
- Inadequate parking around Dorman
- Needs specific mention of connection to the PROW network within this policy
- The Transport Assessment should include consideration of the PROW network.

Response:

Comments noted. Please see responses on pages 55 and 56 to infrastructure and highway concerns at the beginning of this Section.

Additional Modification AM55 adds requirement for PRow connections and improvements.

Other issues:

- Duty to Cooperate point raised with regard to Canterbury City Council
- Aylesham should have a sustainable garden settlement with infrastructure
- Site allocation should be expanded to North of Holt Street and include limited housing as part of mixed use site
- Protection of heritage needed as well as a heritage centre on this site.

Response:

Comments noted. Please see response to SAP24 in relation to Canterbury CC Duty to Cooperate issue.

SAP27: Land at Dorman Avenue North, Aylesham (AYL001)

11 Representations have been received from the following consultees

26 Jamie Pout	871 Jan Gray
123 Mrs Burnett and A Burnett	910 Heather Green
159 Aylesham Parish Council	1526 DDC Housing Dept
211/212 Sara Garrity	1579 Cllr Linda Keen
680 The Woodland Trust	2037 Karen Phillips

Support:

Support from landowner

Issues:

- Loss of woodland (registered native) and veteran trees. Suggestion to add requirement for tree surveys and root protection areas
- Flooding at Dorman Ave, existing woodland controls surface water
- Loss of agricultural land
- Highway Safety – accidents and traffic on B2046
- Highway Capacity on local network
- Too much development in settlement already / Lack of Infrastructure

Response:

Policy requires consideration of groundwater source protection zones 2 and 3.

Additional Modification AM56 adds requirement for Tree Survey / Arboricultural assessment which takes into account root protection areas.



Local Centres: Eastry, Wingham, Ash, Shepherdswell, St Margarets, Kingsdown, Eythorne and Elvington

Introduction to Local Centres:

6 Representations have been received from the following consultees:

114 Vince Croud	411 Sharon Danby
591 Emmanuel College	1266 Savills on behalf of Church Commissioners
1703 AAH Consultants on behalf of Land Allocation Ltd	1883 Savills on behalf of David Wilson Homes

(Note that some representations made on site specific policies in the sections below also include general views about the overall settlement and all allocations and have been reflected in this commentary)

Issues:

- Objection to the scale of building around Eythorne and Elvington and their classification as local centres, owing to the distinct character of the two settlements and the need for separation, lack of services and infrastructure and traffic and parking issues due to the school and narrow roads
- Objections to allocations in Elvington and Eythorne in relation to local highway network and need for traffic calming, and lack of public transport.
- Objection to the designation of Kingsdown as a local centre due to inadequacy of roads servicing the village and lack of services including no doctors and poor public transport connections
- Objection to lack of further allocations in Ash
- Objection to the development around Nonington on the grounds of traffic, drainage and impacts on tourism from over-development

Response:

Classification of Eythorne, Elvington and Kingsdown in the Settlement Hierarchy is responded to against Appendix E. As paragraph 4.214 states the village of Ash has an adopted Neighbourhood Plan which forms part of the Development Plan for the District and this includes a number of site allocations. No allocations are therefore proposed for Ash in the Local Plan. Representations about the impact on Nonington of developments in the wider area are considered in the Small Villages and Hamlets section of this Report.



Eythorne and Elvington Site Allocations

Introduction to Eythorne and Elvington:

11 Representations have been received from the following consultees:

90 Ian Bull Consultancy	932 John Garcia-Rodriguez
902 Nonington Parish Council	1330 Rebekah Bates
960 Sharon Danby	1641 Tilmanstone Parish Council
1624 Colin and Linda Tearle	1807 Linda Symes
1740 Quinn Estates Ltd	2026 Mark Heath
642 John Bishop and Associates on behalf of Canterbury Diocesan Enterprises Limited	

Issues:

- lack of public transport
- inadequate local services and facilities for residents
- too much traffic on roads and lack of safe pedestrian walkways
- poor drainage infrastructure
- need to transform homes to zero carbon
- impacts of growth at Elvington on Tilmanstone has not been considered and local infrastructure will be put under strain with road improvements and bus services required.

Response:

As part of the Local Plan preparation, all potential sites were assessed to determine their specific impacts and potential cumulative effects on the road network. Where it is considered that mitigation was required (in consultation with Kent Highways), this is identified within site specific policies and the Infrastructure Delivery Plan (IDP) which supports the Local Plan.

Where the impacts of development were considered to be 'severe' and there were no deliverable options for mitigation, sites were considered unacceptable. As part of a planning application, developers will need to submit a Transport Assessment and/or Travel Plan to detail any highway issues and sustainable transport options. This will need to address issues identified in the Local Plan policies and the IDP. KCC Highways will review this and determine whether the traffic generated from a scheme creates an issue that requires resolution through the provision of local road and/or footpath and cycle path improvements. If off-site improvements are needed, then the developer may enter into a separate legal agreement with KCC Highways.

SAP28: Land between Eythorne and Elvington:

32 Representations have been received from the following consultees:

29, 464 Peter Jull	60 Vince Croud
198 Matthew Cook	200 Leanne Turner
320 Charles Baynes	428 Patricia Smith
484 Eythorne Parish Council	536 Finn's
590 Bidwells on behalf of Emmanuel College	619 CPRE Kent
896 Linda Nash	915 Sindy Denyer
994 Kent County Council	1091 Dover and Deal Green Party



1223 Michael Godfrey	1229 Yazmin Godfrey
1239 Sarah Bates	1289 Paulette Butcher
1449 RSPB	1457 Natural England
1492 Annette Whitehead	1494 Malcolm Whitehead
1525 Hume Planning on behalf of Dover District Council	1530 Dover District Council (Housing)
1580 Cllr Linda Keen	1600 Walmer Town Council
1749 Steve Skinner	1751 Nicholas Smith
1836 David Nash	1945 David Jones
1949 Christina Isherwood	1964 John Horsfall

Support:

- Criteria d) and i) relating to open space, green infrastructure, biodiversity and SuDS are welcomed by 1457.
- 1525 supports the policy but suggests policy re-wording around creating a sustainable masterplan.
- 1530 supports the allocation of the site.

Issue: Access, Movement and Sustainable Transport

- The site is unacceptable without direct access to Wigmore Lane
- Promoter requests removal of reference to providing access to Wigmore Lane
- Poor local footpath and cycling connections and the loss of PROW through redevelopment. KCC request specific reference to connections of site to PROW network including upgrades for walkers and cyclists
- Provision has not been made for equestrian users
- Additional traffic will cause pollution
- Bus service has been cut
- The local road network is insufficient and incapable of coping with the additional traffic generated by the development

Response:

Please see responses on pages 55 and 56 of this Report to highway matters and bus service changes.

Issue: Infrastructure:

- Services are limited including that there is one hall, no café and no church in Elvington, the closest GP is Shepherdswell, and the local primary school is at capacity
- Eythorne and Elvington are distinct settlements which should remain separate
- Lack of local employment
- Insufficient capacity in the water and wastewater systems to accommodate additional development
-

Response:

Please see responses to representations on the Settlement Hierarchy (Appendix E of the Local Plan) on the issues relating to facilities at settlements. Clarification to be added to the supporting text to make clear that Eythorne and Elvington are distinct centres.



Issue: Environment and landscape:

- Landscape impacts, impacts on biodiversity and loss of green space
- Objection to the lack of mention of turtle doves in the policy as site lies within 1km of a Turtle Dove Friendly Zone established to protect this priority species
- Loss of arable farmland
- masterplan should be informed by LVIA, and policy should include reference to ensure appropriate species and habitat surveys are carried out prior to determination

Response:

Comments noted. Clarification to be added to state that an LVIA will be required and to reflect updated data on turtle dove friendly zones.

Other issues:

- The houses built would not be affordable
- Over-reliance on delivery from the site later in Plan period
- The scale of development proposed is too large
- Promoter requests increase of capacity to 350, reference to improving existing facilities rather than creation of new, clarification of convenience store use class and removal of reference to undergrounding power cables, challenges justification for employment uses

Response:

Comments noted.

Additional Modifications AM58 and AM59 clarify the strategic role of the villages of Elvington and Eythorne as Local Centres, add references to help protect Turtle Doves, provision of offices or work hub and a requirement for an LVIA.

SAP29: Land at South-Eastern side of Roman Way, Elvington

11 Representations have been received from the following consultees:

443 Finn’s on behalf of Richard Ledger	485 Paulette Butcher
486 Eythorne Parish Council	917 Sindy Denyer
1224 Michael Godfrey	1230, 1389 Yazmin Godfrey
1493 Annette Whitehead	1495 Malcolm Whitehead
1582 DDC Cllr Linda Keen	1946 David Jones

Support:

443 supports the allocation, confirming it is deliverable in the first 5 years of the Plan but arguing trajectory is wrong as site will be built out in first 5 years

Issues:

- The suitability of highway network for additional development and lack of public transport connectivity with no rail station and bus service recently cut
- Issues raised around capacity of the local primary school and access to medical facilities



- Loss of agricultural farmland
- Lack of local employment opportunities

Response:

Comments noted. Please see responses on pages 55 and 56 of this Report to highway matters and bus service changes.

SAP30: Chapel Hill, Eythorne

8 Representations have been received from the following consultees:

744 Levi Goodey	918 Sindy Denyer
1241 Sarah Bates	1281 Linda Burton
1534 DDC (Housing)	1584 DDC Cllr Linda Keen
1947 David Jones	1968 Michael Spain

Support:

1534 supports the allocation and confirms the site is available

Issue:

- The overlooking of existing houses from the proposed new ones
- The garages and surrounding area being used for parking and the narrowness of the site’s access, and several comments mentioned that the surrounding roads are incapable of coping with the proposed additional development, linked to a lack of sustainable transport options in the area
- Agricultural land should not be built on
- Lack of infrastructure and services
- local highway and public transport concerns

Response:

Comments noted. Please see responses on pages 55 and 56 of this Report to infrastructure, highway matters and bus service changes.

Eastry Site Allocations

Introduction to Eastry:

10 Representations have been received from the following consultees:

854 Hugh O’Brien	2007 Denise Bottle
1153 Beat Hochstrasser	2008 Mitchell Ferrier
1809 Roy Marshall	2012 Patrick Clarke
1810 Alison Marshall	2017 Clive Harris
2002 Jane Brain	2030 Rebecca Redworth



Issue: Additional Development:

- Objection to any additional development at Eastry due to harm to the historic character of this ancient village, poor local infrastructure (primary school at capacity, no GP, low provision of bus services), houses will be unaffordable, destruction of hedgerows, trees and food producing farmland, history of flooding.
- Proposed level of development out of proportion to the size of the village
- Objection to additional development, aside from brownfield former hospital site, without any improvement in basic infrastructure.

Response:

Comments noted.

SAP31: Statenborough Farm, Eastry

No representations received.

SAP32 Land at Buttsole Pond, Lower Street, Eastry

25 Representations have been received from the following consultees:

125 Jim Wilson	1427, 1432 Hume Planning on behalf of Jane Marsden, Andrew Mollat, Sarah Wells
417 Alex Child-Villiers	1601 Frances Taylor
430 Gary Ransley	1602 Walmer Town Council
433 Graham Baker	1645 Eastry Parish Council
442 Kirsty Bell	1654 Kim Hylott
581 Jonathan Russell	1700 Claire Delahay
621 CPRE Kent	1738 Lesley Smith
762 Tanya Jaynes	1750 Michael Gear
860 Mark Gleave	1751 Nicholas Smith
1092 Dover and Deal Green Party	1754 Amanda Parsonage
1181 Anne Adam	1761 Gary Ransley
1209 William Armstrong	1798 Brian and Sue Manton

Support:

1427 and 1432 support the allocation and the identified capacity, noting that a pre-application has already been submitted to the Council and that landowners are committed to delivery

Issues:

- The worsening of traffic in the locality, particularly on Lower Street near the proposed site access at Buttsole Pond
- Availability of the proposed secondary access via a property named Halcyon
- Buttsole Pond has historically flooded so additional housing could worsen this
- Additional pressure placed on local infrastructure and services, specifically medical practices and schools
- Lack of access to public transport, particularly railway stations
- Loss of agricultural land
- Water scarcity
- Landscape detriment
- Loss of wildlife habitats



Response:

Comments noted. Please see response to highway matters on page 55 of this report.

SAP33: Eastry Small Housing Sites

14 Representations have been received from the following consultees:

75 Alex Child-Villiers	760 Tanya James
210 John Roger	1343 Colin Boughton
434 Graham Baker	1396 Alex Child-Villiers
523 Jim Wilson	1646 Eastry Parish Council
551 Hobbs Parker on behalf of Thomas Estates Development Ltd	1764 Alan Hughes
555 Hobbs Parker on behalf of Jane Thomas	1869 L T James
622 CPRE Kent	2031 Matthew Thomas

EAS009:

Support

555 supports the quantum of development proposed, but objects to the lack of precision in the policy text about access which should be specified via Church Street and landscape buffer along the south-eastern boundary of the site.

Issues:

- Disconnected from the village
- Landscape concerns
- Highway concerns
- Impact on listed buildings at 1 and 2 Eastry Court Cottages and the Conservation Area due to narrowness of access from Church Street

Response:

Comments noted.

Additional Modifications AM60 clarifies that access should be via Church Street and that the landscape buffer should be along the south-eastern boundary of the site.

TC4S023

Support

- 551 supports the allocation and confirms its availability, 2031 also supports the allocation

Issues:

- Access is unsuitable via lane which is often single-track due to parking and bend at bottom of Lower Street
- Land ownership issue raised re access to site
- Impact on views from PROW off Brook Street
- Impact on local services/infrastructure



- Increased flood risk around Buttsole Pond
- Impact on conservation area and listed building
- Site was not in the Reg18 Plan so no previous opportunity to comment

Response:

Comments noted.

Kingsdown Site Allocations

Introduction to Kingsdown:

3 Representations have been received from the following consultees:

776 Anne Ballinger	888 Marilyn McDowall
879 Marilyn McDowall	

Issue:

- Housing is not affordable and there is no local connection test
- The proposed sites fail to respect the highly attractive and sensitive landscape setting

Response:

Comments noted.

SAP34: Land at Woodhill Farm, Ringwold Road, Kingsdown

84 Representations have been received from the following consultees:

71 Elizabeth Zdziebko	880 Chris Graham
250 Sue Lamoon	889 Sophie Peach
264 Kent Downs AONB Unit	891 Alexa Childs
318 Richard Henchley	901 Shaun Roper
340 Mauro Feltrin	906 Robert Cummings
359 Sharon Danby	995 KCC
360 Nicholas Fish	1048 Sarah Waite-Gleave
363 Angela Shrimpton	1093 Dover and Deal Green Party
368, 953 Anne Ballinger	1323 J Mallion
374 Amanda Clarke	1344 Linda Brennan
375 Mrs Sally Colligan	1345 Peter Cartwright
377 Monica Hough	1550 Susan Watson
378 Don Hough	1603 Walmer Town Council
392 Robin Mulhern	1615 Ringwold with Kingsdown Parish Council
402 Caroline Cannons	1662 Simon Jefferson
403 Paul Cannons	1752 Mike Hawker
421 Sue Lamoon	1755 Alan and Sarah Gleave
422 Elizabeth Deschamps	1763 Victoria Hughes
431 Laurence Wheeler	1793 Simon Pollard
449 Ian Williams	1806 Alan Nash



461 Maurice Webb	1816 Carolyn Barber
465 Charles Walters	1825 Sandra Upton
476 Catherine Sayers	1831 Claudia Carr
579 Maxwell McDowall	1840 Marion Osborne
582 Catherine Taylor	1844 Peter Alan Davis
584 Catherine Stone	1845, 1848 Cindy Crancher
586 Phillip Deschamps	1858 Patricia Barrington
620 Rhona Kyle	1866 Vanessa Clift
632 Philip Sparks	1871 Suzanne Mulvaney
658 Karen Brewer	1874, 1880 Tony and Valerie Armitage
665 Robert Hogben	1881 Rosemary Ann Holmes
673 Hugh Kyle	1899 Jenifer Wakelyn
697 Roger Highton	1922 Lesley Dobby
721 Suzanne de Ruyter	1927 Nigel Blundell
748 Jonathan Stone	1932 Deborah Moggach
766, 816 DHA Planning on behalf of Kitewood	1948 David Dobby
773 Timothy Stone	1962 Ian Miller
817 Martin Stone	1963 Henry Paice
840 Phil Peach	
846 Daniel Couzens	
850 Martin Garside	
878 Noelle Graal	

Support:

- 264 advises that policy criteria a,b,c and e are crucial in managing impacts on AONB but that it is unlikely planting will have reached maturity prior to completion of development
- 766 and 816 site promoters support the allocation, confirming the site’s availability but accompanied by assessment of use of land, suggesting 50 homes is too low and should be increased to 90.

Issue: Highway Capacity and Safety:

- Traffic on Ringwoud Road will be dangerous as accesses to village centre are via single track roads at The Rise and Glen Road
- Lack of connections for walking and cycling to/from the site – ER20, 21 and PROW network offsite should be considered in Transport Assessment

Response:

Comments noted. Please see response on page 55 of this Report to highways matters. Clarification will be added regarding PROW network.

Additional Modification AM61 confirms need for PROW network connections.

Issue: Environment and Landscape:

- criteria e should be amended to require tree planting be carried out either prior to the commencement of development or at the time of development



- Loss of greenfield/agricultural land
- Landscape impact as site borders AONB.
- Site not included in landscape sensitivity assessment
- Harm to wildlife
- Worsening of flood risk due to development
- Possible Saxon burial ground on site

Response:

Comments noted. The housing growth strategy seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (viability and delivery), greenfield sites have also had to be identified to meet the District’s housing needs and ensure a continuous supply of housing across the plan period. Criteria of this Policy require a Landscape and Visual Impact Assessment in order to ensure that landscaping and planting provided as part of development will mitigate any harmful impact to the AONB and the wider countryside, a site-specific Flood Risk Assessment and an Archaeological Assessment. Confirmation that tree planting should be carried out either prior to the commencement of development or at the time of development will be added.

Additional Modification AM61 clarifies timing of tree planting.

Issue: Infrastructure and Local Services

- Poor services/facilities including doctors, bus service, primary school oversubscribed, limited access to secondary school

Response:

Please see response on page 56 of this Report regarding infrastructure issues.

Miscellaneous Issues:

- No need for houses due to presence of empty homes and AirBNBs
- Housing not affordable and local workers priced out.
- Impact on amenity of existing residents
- Altering of character of Kingsdown including effect on conservation area
- Limited employment opportunities nearby
- Impact on tourism/visitors

Response:

Comments noted. Housing need for the district is addressed in Policy SP3 of this Plan. Development of this allocation will be subject to the Plans strategic policy on Affordable Housing SP5.

SAP35: Land adjacent to Courtlands, Kingsdown

41 Representations have been received from the following consultees:

70 Elizabeth Zdziebko	885 Robert Cummings
84 Mr Costa	955 Anne Ballinger
229 Maxwell McDowall	1094 Dover and Deal Green Party
319 Richard Henschley	1305 Barbara Ridout



341 Mauro Feltrin	1355 David Powell
380 Sally Colligan	1393 David Casey
382 Monica Hough	1604 Walmer Town Council
383 Amanda Clarke	1616 Ringwoud with Kingsdown Parish Council
385 Elaine Mordaunt	1753 Mike Hawker
425 Elizabeth Deschamps	1756 Alan and Sarah Gleave
454 Daniel Couzens	1765 Victoria Hughes
473 Helen Williams	1794 Simon Pollard
524 Sharon Danby	1801 Alan Nash
650 Karen Brewer	1819 Carolyn Barber
720 Phillip Deschamps	1841 Marion Osborne
724 Suzanne De Ruyter	1846 Cindy Crancher
775 Anne Ballinger	1849 Sylvia Main
834 Hope MacDonald	1929 Nigel Blundell
839 Peter Cross	1966 Patricia Barrington
855 Martin Garside	1967 Henry Paice
870 Robert Hogben	

Support:

Representation 1355 finds this policy sound.

Issue: Highway Capacity and Safety

- Ringwoud Road is narrow, has no pavements, is signposted as unsuitable for long or wide vehicles and serves as alternative access for Deal and Walmer populations when A258 is blocked
- All access roads into Kingsdown are too narrow to allow the new Highway Code to be complied with

Response:

Please see response on page 55 of this Report regarding highways matters.

Issue: Coalescence:

- Development of this site would lead to coalescence with Deal/Walmer contrary to SP4 and to The Local Plan’s Landscape Character Assessment which concludes that this landscape plays an important role in providing a rural separation between Deal and Kingsdown and in protecting the setting of the AONB
- Development of this site would compromise the individual character of Kingsdown, contrary to SP4

Response:

Comments noted. The location and scale of this allocation (5 dwellings) is not considered to have the potential to result in a harmful or significant incursion into the open countryside between Kingsdown and Walmer.

Issue: Environment and Landscape:

- Site is rich in biodiversity and wildlife
- Development would seriously harm landscape character
- The Site is an important and environmentally sensitive site, on the skyline, a significant component of iconic coastline views when viewed from the north



- Development would result in loss of farmland with potential for food production
- Loss of “flood sponge”
- Site is a popular one for walkers – its loss would be harmful to the health and wellbeing of local residents
- Low density development would be contrary to national objectives of helping first time buyers, would have little impact on housing supply but a disproportionately harmful impact on local visual amenity

Response:

Comments noted. The policy requires the retention and enhancement of trees and hedgerows along the boundaries of the site to provide a buffer between the five new dwellings and the open countryside which borders the site on two sides.

Issue: Infrastructure and Local Services:

- Kingsdown village has poor infrastructure and services, limited bus service, primary school is full and there is no GP or dentist

Response:

Please see response on page 56 of this Report to infrastructure concerns and matters.

Shepherdswell Site Allocations:

Introduction To Shepherdswell

4 Representations have been received from the following consultees:

366 Mark Norcliffe	713 Shaun Williams
660 Canterbury Diocesan Enterprises Ltd	1698 Guy Osborne

Issues:

- Objection to further development in Shepherdswell on grounds of poor access.
- Traffic modelling data out of date, lack of traffic surveys in Shepherdswell and inaccurate travel time cited for journey between Shepherdswell and Eythorne.

Response:

Please see response on highways matters on page 55 of this Report.

SAP36: Land to the North and East of St Andrews Gardens, Shepherdswell

35 Representations have been received from the following consultees:

30 Peter Jull	1677 Gill Vaughan
219 Gill Vaughan	1737 Shepherdswell Against the Development
386 Mark Webb	1804 Linda Symes
491 Woodchurch Property (BK) Ltd	1813 Christopher Burke
534 Chris Dalziel	1850 Susan Pike
726 Shaun Williams	1896 Lorraine Stone



757 Sindy Denyer	1901 Mr and Mrs Young
996 KCC	1913 Patricia Goddard
1242 Sarah Bates	1914 Marion Adele Lewis
1244 Rebekah Bates	1916 Lynn Webb
1246 Marita Bates	1940 Jill Jones
1288 Mark Norcliffe	1941 David Edward Sanderson
1402 Christine Dobson	1944 David Jones
1403 Dan Dobson	1950 Diana Plant
1533 Shepherdswell with Coldred Parish Council	1957 David Walker
1559 DDC Cllr Linda Keen	1959 Rev Harvey Richardson
1672 Carol Johnson	1974 Tim Fagan
1674 Chris Dalziel	1978 R Winter

Group representation:

- A group representation with 111 signatures was submitted objecting to this allocation (1737)

Support

Developer of part of this site (TC4S082) supports allocation but objects to merger with SHE004 which is in separate ownership.

Issue: Highway capacity and safety:

- Access roads narrow and inadequate
- No secondary emergency access provision
- Why is a Transport Assessment not required by this policy?
- Limited parking in the village
- Additional pressure on roads due to development proposed at Eythorne and Elvington which will need to travel through Shepherdswell and Coldred to reach A2
- Dangerous road junctions at Eythorne Road with Church Hill, Westcourt Lane
- No footpaths or cyclepaths
- Limited traffic modelling data out of date and unreliable

Response:

Traffic and access requirements are set out in criteria c, d, and e of the Policy. Please see response to highways matters on page 55 of this Report.

Issue: Infrastructure and Local Services

- Limited facilities, including oversubscribed school and GP surgery
- Poor public transport
- Local plan evidence is inaccurate in relation to services available
- Sewage and drainage concerns

Response:

Please see response on page 56 of this Report to infrastructure facilities concerns.

Issue: Flooding:

- Inadequate sewerage system causing instances of foul flooding
- Surface water flooding already on Approach Road



- Existing water pressure problems

Response:

Comments noted. A Flood Risk Assessment is required by this policy.

Issue: Environment and Landscape:

- Site is only green space in the village
- Open space is not nearby
- Loss of hedgerows
- Brownfield land should be built on first before farmland
- Via Francigena ancient pilgrim trail between Canterbury and Rome should be protected
- Policy should include requirement to improve PROW ER78/North Downs Way

Response:

Comments noted. Shepherdsweil recreation ground and children’s play area is approximately 200m to the west of the site beyond the North Downs Way PROW. Open space provision in accordance with Policy PM3 is required by criterion I. KCC advised on requirements for access and pedestrian access criteria prior to Regulation 19 stage.

Additional Modification AM62 updates policy to include requirement to improve PROW connections, including to the North Downs Way.

SAP37: Shepherdsweil Small Housing Sites

23 Representations have been received from the following consultees:

222 Gill Vaughan	1472 Coxhill Road Residents
746 M Page	1539 Shepherdsweil with Coldred Parish Council
920 Sindy Denyer	1560 DDC Cllr Linda Keen
931 Gill Vaughan	1805 Linda Symes
997 KCC	1902 Mr and Mrs Young
1243 Sarah Bates	1903 Mr and Mrs Young
1245 Rebekah Bates	1942 David Edward Sanderson
1247 Marita Bates	1943 David Jones
1265 Church Commissioners	1975 Tim Fagan
1271 Church Commissioners	1979 R Winter
1327 Marita Bates	1980 R Winter
1331 Rebekah Bates	

Group representation:

- A group representation with 23 signatures was submitted objecting to this allocation (1742)

Support:

Representations 1271 and 1265 from land promoters find allocation sound but request increase in capacity from 10 to 25.

Issue: Highway capacity and safety

- Inadequate highway capacity as Mill Lane is single track and too narrow
- Additional pressure on roads due to development proposed at Eythorne and Elvington which will need to travel through Shepherdswell and Coldred to reach A2
- Dangerous road junctions at Eythorne Road with Church Hill, Westcourt Lane
- No footpaths
- Limited traffic modelling data out of date and unreliable

Response:

Comments noted. Transport Statements are required by this policy for applications for both SHE006 and SHE008. Please see response on page 55 of this Report to highway matters.

Issue: Flooding:

- Surface water flooding already a problem in the area
- Inadequate sewerage system causing instances of foul flooding
- Existing water pressure problems

Response:

Comments noted. Flood Risk Assessments are required by this policy for applications for both SHE006 and SHE008.

Issue: Infrastructure and Local Services:

- Evidence for the scoring of Shepherdswell in the Rural Settlement Hierarchy questioned
- Limited facilities, including oversubscribed school and GP surgery and lack of funds to improve them.
- Poor public transport – Bus services have been cut
- Sewage and drainage concerns

Response:

The basis for the scoring of Shepherdswell in the Rural Settlement Hierarchy is responded to against Appendix E. Please see response on pages 55 and 56 of this report with regard to infrastructure and bus services.

Issue: Environment and landscape:

- Brownfield land should be built on first before farmland
- Via Francigena ancient pilgrim trail between Canterbury and Rome should be protected
- Policy should include requirement to improve PROW ER81

Response:

The housing growth strategy seeks to make as much use as possible of brownfield sites. However, due to their limited availability, and constrained nature (viability and delivery) greenfield sites have had to be identified to meet the District's housing needs and ensure a continuous supply of housing across the plan period.

Additional Modification AM63 updates policy to include requirement to improve PROW connections.



St Margaret’s-at-Cliffe Site Allocations

Introduction to St Margarets -at-Cliffe

1 Representation has been received from the following consultee:

1013 Carlo Nuvoletta	
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- General comment that village is unsuitable for additional development due to poor infrastructure.

Response:

Comment noted.

SAP38: Land adjacent to Reach Road, St Margaret’s-at-Cliffe:

18 Representations have been received from the following consultees:

10 Alison Mott	1424 National Trust
105 St Margarets at Cliffe Parish Council	1452 Maureen Woods
128 Michael McLean	1500 Sandra Upton
186 Veronika Rudd	1589 Susan Turner
265 Kent Downs AONB Unit	1746 Janet Eades
345 Karen Block	1748 Janet Eades
670 Talina Wells	1811 Liz Marshall
835 Harris Lamb	1822 Dianne Marsden
934 Linda Carter	2043 Ali and Ian Smith

Support:

- Representations 105 and 265 find the allocation sound.
- Site promoter supports the allocation and confirms site is deliverable 835

Issues:

- local infrastructure including GP and school insufficient and congested
- Development will exacerbate existing highway capacity and traffic problems
- Poor footpath connections
- Harm to AONB and its setting
- Loss of agricultural land
- Harm to wildlife
- New criterion requiring a project level HRA to be added
- Advanced planting is unlikely to reach maturity prior to the completion of the development.

Response:

Please see response on pages 55 and 56 of this Report with regard to highway and infrastructure concerns. Criteria a and b of this Policy require measures to mitigate harm and manage impacts on the AONB and heritage coast.

Additional Modification AM65 clarifies that tree planting should be undertaken prior to or at time of commencement.



SAP39: Land to the west of Townsend Farm Road, St Margaret's-at-Cliffe:

14 Representations have been received from the following consultees:

106 St Margarets at Cliffe Parish Council	818 Meadowview Residents
129 Michael McLean	872 Carlo Nuvoletta
185 Veronika Rudd	905 Angie Brown
266 Kent Downs AONB Unit	935 Linda Carter
540 John Flowerdew	973 Talina Wells
774 Kate Jackson	998 KCC
791 Tony Condon	1678 Hannah Ling

Support:

Representations 106 and 266 find allocation sound.

Issues:

- Development will exacerbate existing highways and traffic problems
- Allocation does not include any requirement to improve local infrastructure
- Harm to AONB and its setting
- Archaeological potential
- Will increase light pollution
- Insufficient footpath connections
- Allocation should include requirement to improve PROW ER21

Response:

Please see response on pages 55 and 56 of this Report with regard to highway and infrastructure concerns. The site is considered to be relatively well contained within the wider landscape and relates well to the existing settlement. Criteria a and b of this Policy require measures to mitigate harm and manage impacts on the AONB. Criterion i requires a Heritage Assessment to be undertaken to include appropriate archaeological investigations.

Additional Modification AM66 updates policy to include requirement to improve PROW connections, including to the North Downs Way.

SAP40: St Margaret's-at-Cliffe Small Housing Sites

73 Representations have been received from the following consultees:

7 Gerald Irvine	323 Helen and Paul Thornton
14 Colin Sumner	346 Cllr Martin Bates
45 Robin Thornes	352 Tina Irvine
62 Michael McLean	355 Geoffrey Quiddington
65 Joan Thompson	369 St Margarets at Cliffe Parish Council
66 David Lofthouse	376 Toby Caulfield
92 Michael Nee	389 Guy Morgan
97 Colin Sumner	404 Jonathan Olson-Welch
98 Valerie Kernick	453 David King
102 Mark Febery	475 Lynda Keohane



104 Ian Turner	481 Linda Carter
109 Helen Paulett	483 Stuart Walker
111 Michael Perschky	487 Peter Barratt
130 Michael McLean	489 Diane Baines
144 John Kirby	521 David Dunford
147 Claire Owen	547 Patricia Tordoir
148 Kevin Beckett	548 Susan Walker
157 David Lambeth	623 CPRE Kent
160 Julia Main	640 St Margarets Conservation Association
163 Salisbury Road Residents Association	800 Esquire Developments
164 Veronika Rudd	864 Vivienne Pay
184 Veronika Rudd	974 Talina Wells
189 Jane Pire	1009 Lorna Biggs
191 Jean-Francois Pire	1280 Robert Blowers
195 Phillip Houckham	1282 Russell Abrahams
196 Neil Buckley	1320 William Ratchford
201 STM010 Residents Group	1341 Douglas Johnston
209 Mary Bernadette Taylor	1356 David Powell
220 Sophie Byatt	1426 National Trust
225 Carine Verstraete	1524 Peter Wash
237 Martin Slocombe	1830 Elizabeth Bostock
251 Gary Muirhead	1873 Margaret Scott
268 Kent Downs AONB Unit	1965 Julian Thorn
315 Kent Downs AONB Unit	2033 Rebecca Woods
317 Jill Jordan	240 Orla Checksfield
330 Alan Smalley	64 Joan Thompson
	401 Douglas Johnson

STM006:

Support:

Representations 315 and 800 support STM006

STM010:

Group representations:

- A group representation with 135 signatures was submitted objecting to this allocation (201)
- A group representation with 81 signatures was submitted objecting to this allocation (163)

Support:

Representation 1356 from the landowner supports the allocation of STM010

Issue: Environment and Landscape

- Harm to the AONB and Heritage Coast in which the site is located
- HELAA wrongly states that the site is adjacent to the AONB and the Heritage Coast, rather than in it. The strength of the HELAA assessment is therefore questioned.



- No material changes to this site since the previous HELAA for the LALP concluded development of this site would have a “highly detrimental impact to the designated landscape”
- Proposed site allocation SAP40 is located approximately 300m west of the Dover to Kingsdown Cliffs SAC with direct access to the South Foreland Coastal Path and the SAC via a historic permissive path through National Trust land that adjoins the proposed site allocation to the north. Although protection should be afforded through proposed Policy SP13 Protecting the District’s Hierarchy of Designated Environmental Sites and Biodiversity Assets, the Trust wants certainty that the integrity of the Dover to Kingsdown Cliffs SAC qualifying features will be maintained and enhanced and that appropriate avoidance and mitigation measures will be in place.
- NT Recommend criterion added to policy wording which states, ‘Due to the scale of development and close proximity to the Dover to Kingsdown Cliffs SAC and site of SSSI, a project level HRA is required. The HRA should consider the potential impact pathway of significantly increased recreational pressure and the relevant avoidance or mitigation measures required in line with Strategic Policy SP13’.
- The supporting Sustainability Appraisal Regulation 19 (September 2022) identifies the site to have the ‘potential to moderately affect the District’s landscapes, townscapes or seascapes’.
- Site Policy does not acknowledge position of site within Heritage Coast given the omission it is of the opinion that not full consideration had been given to the sites status as defined Heritage Coast.
- The site has an elevated position within the landscape and any development in this location would be visually intrusive when viewed from the north back towards the village and it is considered that development here will have an adverse impact on the undeveloped coast.
- Contrary to Policy SP4 c that proposals for residential development in settlements in, adjoining or surrounded by, the Kent Downs AONB or Heritage Coasts, must comply in the first instance with the primary requirement of conserving and enhancing landscape and scenic beauty.
- Contrary to Policy NE2 criterion j of the Local Plan
- Will destroy the scenic value of the White Cliffs
- Prominent site, elevated by up to 5m above properties on Salisbury Road the level of the road, highest point in the area and with wide ranging coastal views
- Adjacent to National Trust land at Bockhill Farm
- Severely harm landscape character open chalk grassland, cliff top, tranquil, sense of remoteness
- The Kent AONB Management Plan refers to the “breath-taking long-distance panoramas from clifftops and plateaux” in the district as one of its most iconic features: these views should be given the highest levels of protection, but the development proposed for STM010 would deprive local residents and visitors of one of the most valuable points in the locality for appreciating them.
- Contrary to NPPF paragraphs 174, 175 and 176
- Will harm wildlife
- PROWs along three of the boundaries very popular, route to NT land



- As the Droveaway connects to several public footpaths, including the Frontline Britain Trail and others leading seawards to the English Coastal Path, it also carries a high level of pedestrian traffic, including recreational walkers and local dog-walkers. Adjacent to Kent Coastal Walk and Frontline Britain Trail leading to the Dover Patrol Memorial walkers seeking access to Bockhill Hill and the English Coastal Path beyond are likely to be displaced on to the paths on the adjoining coastal habitats of the SSSI and SAC.
- Loss of farmland
- Proximity to the SAC and SSSI
- Route of migratory birds, popular spot for bird watchers
- SAC given insufficient weight, sensitivity of site incorrectly assessed
- Light pollution Does not comply with para 11.9 of the Plan re dark skies
- given the sensitive location and special characteristics of this site, to achieve any significant mitigation of the adverse impact of housing development. The landowner's submission refers to suggested screening of the visual impact of the site by landscaping: it seems commercially unlikely that this will be carried out, given that the magnificent sea views from this site are likely to be an important marketing advantage for any properties built on it. Any such screening would in itself be deleterious, as it would block the important views across the site from public access points to the coast, countryside and historic monuments in the vicinity.

Issue: Highway Capacity and Safety

- Highway capacity and safety
- Existing congestion outside GP surgery and at junction of Bay Hill, The Droveaway and Sea Street
- The Droveaway is a cul de sac and Salisbury Road is an unadopted private road neither suitable for additional traffic owned and maintained collectively by the residents whose properties front the road.
- The Droveaway is used by heavy farm machinery to Bockhill Farm
- Narrow local roads unsuitable, not always pavements

Issue: Infrastructure and Local Services:

- Local infrastructure inadequate – including GP, school, bus services
- Bus services reduced.

Issue: Heritage:

- Significant harm to views of Grade II* listed Dover Patrol Memorial and long views of Grade II listed South Foreland Lighthouse
- Archaeological interest, potential Saxon burial site as number been found in vicinity

Other Issues:

- Not deliverable as no legal access to the site and site boundary appears to include land outside of the ownership of the site promoter
- Concerned once the principle was accepted development could seek higher density from 10 up to 72 dwellings



- Contrary to duty to co-operate as site was added on last day of Reg 18 public consultation thus denying the local community and parish council the opportunity to comment of it

Response:

HELAA error acknowledged. Please see HELAA Errata document. Responses reviewed and the Policy has been extensively clarified with additional detail in order to address matters raised.

Additional Modification AM67 responds to issues raised by representors with regard to STM010.

Wingham Site Allocations

Introduction to Wingham:

2 Representations have been received. These refer to omission sites which are addressed in Annex 2.

828 TG Designer Homes	1520 Guy Van Petegem
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SAP41: Footpath Field, Wingham

4 Representations have been received from the following consultees:

793 Wingham Heritage Ltd	999 KCC
833 Dandara South East Ltd	1647 Wingham Parish Council

Support:

- 793 and 833 support this allocation.
- Parish Council supports allocation of SAP41 but objects to the increase in dwellings from 50 to 75 since Reg 18 Plan due to potential harmful impact on traffic, in particular the Staple Road/B2046 Adisham Road junction, and issues of surface water drainage. Advises that it is important that results of LHNS undertaken by ACRK in 2021 which identified a need for 10 affordable homes and 3 open market suitable for older people and included in the development SAP41.

Issue:

Addition sought to the Policy to include reference to better pedestrian connectivity

Response:

Comments noted.

Additional Modification AM69 clarifies PROW connectivity requirements.

SAP42: Wingham Small Housing Sites

5 Representations have been received from the following consultees:

68 Finn's	503 Shelley Morris
214 Richard Stevens	1648 Wingham Parish Council
393 Finn's	



Support:

Representations 214, 593 and 1968 find this Policy sound.

Site promoter supports the allocation of WIN003 but seeks an increase in capacity from 20 to 24 dwellings.

Issue:

One objection to allocation of WIN003 on highway capacity and loss of farmland grounds.

Response:

Comments noted.

Larger Villages: Caple-le-Ferne, Lydden, Preston, Worth, Alkham, East Langdon

Introduction To Larger Villages:

6 Representations have been received from the following consultees.

350 David Woodward	518 Alkham Valley Society
439 Worth Parish Council	1007, 1008, 2034 Northbourne Estate

- Representations 350, 1007, 1008 and 2034 are Omission Sites and therefore are dealt with in Annex 2. They appear in this table as Northbourne is classified in the hierarchy as a Larger Village.
- Lack of infrastructure and highway concerns, including reduction in bus service (439, 518)
- Objection to WOR006 and WOR009 (439)

Response:

Comments noted. Impact upon Alkham Valley Road has been assessed and potential mitigation identified. Please see pages 55 and 56 of this Report for overall response to infrastructure issues.

Alkham Site Allocations:

Introduction to Alkham

2 Representations have been received from the Following Consultees:

515 Alkham Valley Society	1680 Rubix Estates
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Issues:

- Agree need for housing, but it must come with appropriate design and supporting infrastructure, to ensure safety and preserve the character of an historic AONB village (515).
- Although the village has a good bus service, this is scheduled to be halved, and bus stops are inaccessible due to lack of footpaths. The bus service should be preserved.



- Traffic should be redirected, slowed and reduced (with crossing points and shelters) to ensure pedestrian and bus user safety (518).

Response:

Comments noted. Impact upon Alkham Valley Road has been assessed and potential mitigation identified.

SAP43: Land at Short Lane, Alkham

7 representations have been received from the following consultees:

40 Tina Matcham	269 Kent Downs AONB Unit
552 Hobbs Parker	1001 Alkham Parish Council
1292 Alkham Valley Society	1691 Rubix Estates
1777 Mairi Jones	

Support:

- The AONB unit considers the site is relatively well contained within the wider landscape and relates well to the existing settlement. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported (269).
- Support (1691 and 1777)
- work is being progressed to produce supporting evidence for a planning application likely to be submitted in 2023 (552).

Issue: Roads, transport, movement and access:

- Bus service is minimal/ not frequent or regular (1001).
- Traffic increase not acceptable.
- The junction of this development area is an accident hotspot due to visibility splays and speed of traffic. Design should be reviewed (1292).
- On-site parking needs to be adequate as the road is congested by resident vehicles.
- Passing traffic should be slowed and reduced (1292).

Response:

Please see response on page 55 of this Report with regard to highway concerns. Impact upon Alkham Valley Road has been assessed and potential mitigation identified.

Issue: Infrastructure:

- Inadequate infrastructure, especially sewage (1001, 1292) and waste water disposal (40).
- Polluted surface water endangers the aquifer, so this needs to be addressed as part of the planning process. 1292
- Services and facilities and infrastructure are inadequate (40)
- There are no shops, no school, no GP surgery (1001)

Response:

Please see response on page 56 of this Report with regard to infrastructure concerns.

Issue: Location, Character and Landscape:

- Detrimental to the AONB and there has been a previous refusal of development on the site (APP/X2220/W/17/3180321), and the reasons are still valid.



- There will not be suitable screening and the AONB Management Plan does not provide support.
- Outside the village confines and obtrusive development in the countryside (723).
- Detract from the rural character of the area and setting of the village (723).
- Precedent for development in the countryside.

Response:

Comment noted.

Other Issues:

- Would welcome more affordable housing to encourage families into the village.
- Development will adversely affect people living nearby.
- Strong Evidence of Wildlife Habitats.
- Flood risk (40, 723)

Response:

Comments noted. Affordable housing will be provided in accordance with SP5.

Caple-le -Ferne Site Allocations:

Introduction to Capel-le-Ferne:

2 Representations have been received from the following consultees:

469 Peter Jull	2032 Tina Wilson
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Issues:

- Capel Le Ferne Parish Council are concerned that the plan seeks to increase Capel Le Ferne by a disproportionate amount compared to the average of the large villages and Local Centres, excluding Eythorne and Elvington (576).
- Recent planning for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands (575, 814)
- Object to development in Capel: Future and sustainability has not been thought about; wildlife harm; noise; flood risk; water shortages and slower telephone, broadband, electricity, and gas (2032).
- Folkestone and Hythe District Council is supportive of the Plan, but seeks continued dialogue between the two Council's, KCC and the health authority on the impact of any future development in Capel-le-Ferne on the provision of schools and health care in Folkestone & Hythe District (987)
- Sites at the western end of Capel should have been considered together. Proposed SAP45 allocations CAP009 and CAP013 could have been considered with CAP15 (which is not proposed for allocation) to widen Cauldham Lane and access to SAP44 (CAP006) (469).

Response:

Comments noted.



SAP44: Land to the east of Great Cauldham Farm, Capel-le-Ferne:

36 Representations have been received from the following consultees:

77 Christopher Malins	1214 Mrs S Bailey
78 Lee Bracegirdle	1260 Ann Bonomy
82 Paul Curtis	1263 Douglas Bonomy
177 Lynne Hancock Dufton Stokes	1829 S Bradshaw
217 Marie- Helene Brown	1833 Bradley Dickenson
239 Stephen Letchford	1835 Rachel Lever
270 Kent Downs AONB Unit	1837 D Belsey
316 Marie-Helene Brown	1857 Lee Bracegirdle
467 Peter Jull	1859 W Leeming
575 Owen Wilson	1905 Mrs J Jarvis
576 Capel-le-Ferne Parish Council	1908 Mr J Jarvis
679 Angela Parkes	1912 Perter and Linda Lever
814 James Blomfield	1928 (Iceni Projects)
987 Folkestone & Hythe District Council	1937 Mr and Mrs Pacey
1000 Kent County Council	1952 Mrs E Bradshaw
1137 Janet Milliken	1956 Jennifer Bennett
1920 John Scannell and Jennifer Rowland	1981 Roger Hobart
1250 Carole Belsey	1984 P Bailey

Support:

- Iceni Projects on behalf of the developer (Quinn Estates) (but seeking changed to capacity)
- AONB unit (with conditions)
- 987 Folkestone and Hythe District Council (with conditions)

Issue: Roads, transport, Movement and Access:

- Increase in congestion, traffic, worsening traffic conditions and poor infrastructure.
- Impact on poorly designed and congested New Dover Road, Capel Street, Cauldham Lane Junction, where there have been collisions. Proposed T junction here is unsafe.
- No transport modelling has been completed for Capel Le Ferne.
- Road infrastructure has insufficient capacity for more traffic
- Cauldham Lane access point to the site is single track, with traffic jams and often blocked by large vehicles.
- Cauldham Lane pedestrian and horse riders safety issue, no footpath.
- Cauldham Lane will need to be widened.
- Sites near Cauldham Lane could have been considered together to produce a cohesive planning solution, such as widen Cauldham Lane to provide access. CAP015 which was rejected would have assisted.
- Concerned about access to property and parking if Cauldham Lane is widened.
- Capel Street (which is the main access route to the Primary School) has insufficient capacity for more traffic and has restricted flow due to parked vehicles (little off-street parking) and increasing numbers of large lorries and vans.
- Capel Street does not have a safe footpath and a new footpath needs to be created but cannot be widened.
- Capel Street access would make it hard to enter the driveway of an existing residence.



- Residents are unlikely to walk or cycle to access services. Health services in Folkestone are not directly accessible by bus.
- Single bus service. No bus to Canterbury. No train.
- Loss of on-street parking.
- All new houses need two parking spaces and visitor parking.
- Emergency vehicles would be unable to access site at Capel Street.
- General impact on emergency services response times and access.

Response:

Please see response to highway concerns on page 55 of this Report. Criteria (d) and (i) amended to clarify access matters.

Additional Modification AM71 clarifies access and highways issues.

Issue: Infrastructure:

- Poor/ insufficient infrastructure
- Drainage has insufficient capacity / needs to be improved; development will have a drainage impact.
- Water supply is weak, water pressure problems.
- Power outages common.
- Concern that services and facilities are too limited / difficult to access,
- The development will affect school intake number; primary school at limits now; insufficient spaces.
- Not having a plan to increase services and facilities will lead to unsustainable travel.
- No major changes or improvements are proposed. A plan for improvements should be in place.
- 40 dwellings recently completed at Grasslands has not led to any new services or facilities.
- No objections subject to continued dialogue on the impact of development on schools and health care in the Folkstone and Hythe District (987).

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Housing Needs:

- Too many dwellings proposed; Capel is at its limits now.
- Recent planning for 34 houses off Capel Street, 15 dwellings at Longships on Cauldham Lane and 40 new dwellings in a recently completed development at Grasslands.

Response:

Comments noted.

Issue: Economy and Agricultural Land:

- The site is greenfield agricultural land and food security is an important issue.
- Little opportunity for employment generation.
- Traffic disruption would impact local businesses.

Response:

Comments noted.

Issue: Location, Landscape and Wildlife:

- Concerned that the proposal does conserve and enhance the character and distinctiveness of the settlement).



- The Grasslands development is not in-keeping with appearance of the village.
- The site is in a prominent position and the development would be detrimental to the setting of the AONB which borders the site. Concerned about the AONB.
- The Kent Downs AONB Unit states: *“it is well contained within the landscape by existing development on its south and eastern sides and vegetation along the western boundary. The proposed requirements included in criterion a and b to help manage impacts on the AONB are supported.”* (270)
- Impact on views. The policy should include reference to Bridleways ER253 252 and the required improvements to support connectivity (1000)
- Harmful to biodiversity and habitats and trees, harmful to red and amber list species.

Response:

Comments noted. Criterion c refers to the protection of important trees and hedgerows and the provision of habitat creation and enhancements. An additional amendment at paragraph 4.16 defines ‘important’. Clarification of PROW to be added.

Additional Modification AM71 clarifies requirement for improvements/connections to PROW network.

Other Issues:

- Viability problems (814)
- Unlikely to be achievable in the proposed timetable (575, 814)
- Will open the door for more dwellings in the future and expansion of infrastructure.
- Previous planning applications on the site rejected.
- Flooding in this area.
- The proposal does not preserve or enhance the historic environment.
- There are listed buildings in the area.
- Pollution (including, light, noise, smell).
- Loss of privacy for existing residents and overshadowing loss of light.
- Concerned new road will run along boundary hedge, close to back door.
- If more houses are needed surely the best place to build them would be next to the proposed brownfield site CAP011.
- Object to the implication in ‘h’ that dwelling numbers will be increased in the future.
- The Council should assess what issues have incurred as a result of recent planning permissions.
- Residential properties will be devalued (1920)

Response:

Comments noted. Policy PM1 sets out criteria relating to High Quality design.

SAP45: Capel-le-Ferne Small Housing Sites

33 Representations have been received from the following consultees:

31 Peter Jull	1261, 1262 Douglas Bonomy
79 Lee Bracegirdle	1834 Rachel Level



83 Paul Curtis	1838, 1839 D Belsey
271, 296, 302 Kent Downs AONB Unit	1910 Peter and Linda Lever
448, 861 Capel-le-Ferne Parish Council	1917 Louise Lewis
696, 1134 Janet Milliken	1919, 1921 John Scannell and Jennifer Rowland
701 DHA (Guardian Parks Ltd)	1939 Mr and Mrs Pacey
784 Folkestone & Hythe District Council	1958 Jennifer Bennett
794 Esquire Developments	1982, 1983 Roger Hobart
1251 Carol Belsey	2018 Natalie Mack
1257, 1259 Ann Bonomy	2019, 2021, 2022 Bradley Dickenson

Longships, Cauldham Lane, Capel Le Ferne (CAP009)

Representations have been received from 10 consultees:

Support

Folkestone and Hythe District Council. No objections subject to continued dialogue on the impact of development on schools and health care in the Folkstone and Hythe District 784

Issue: Infrastructure: Roads, transport, movement and access

- Cauldham Lane is narrow and unsuitable for additional traffic; represents a barrier to development, dangerous corner; regularly blocked by delivery vehicles; used by heavy vehicles accessing the farm and industrial units.
- Reference to a pedestrian connection implies widening of Cauldham Lane, which will increase traffic on this quiet lane.
- Concerned about access to dwelling and parking if Cauldham Lane is widened (1939).
- This site will also impact on the dangerous Cauldham Lane/Capel Street/New Dover Road junction.
- More thought should be given to access issues.

Response

Comments noted. Please see response to highways concerns on page 55 of this Report.

Issue: Infrastructure

- Increase pressure on utilities, including water pressure.
- Poor / inadequate infrastructure
- Capel is at its limits especially the primary school.
- Residents use Heath Service Facilities in Folkestone which is not directly accessible by bus.
- Geographical position means that residents are unlikely to walk to cycle to the nearest town and would use private vehicles.

Response

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Housing needs

- Agree with the concept of a mix of single and double retirement units (861).



Response

Comments noted.

Issue: Location and landscape

- Inappropriate given proximity to AONB.
- Part of site lies in AONB.
- Site is in a prominent position on high ground and significant screening needed to mitigate the impact on the AONB.
- AONB unit states 'The site lies in the setting of the AONB. The proposed requirements included in site specific requirements to help manage impacts on the AONB are supported' (271).
- Agricultural land should be retained for food production.
- Concerned that the proposal does conserve and enhance the character and distinctiveness of the settlement.
- Development may result in the loss of mature trees.
- The proposal does not conserve or enhance the historic environment.

Response:

Comments noted.

Other issues:

- Agree this is a self-contained previously developed site.
- Current planning application not supported (861)
- Recent development in Capel stood unsold and vacant for years; fear a repeat of this in the current economic climate.
- Harm to amenity, loss of privacy, overshadowing, loss of light.
- Noise, pollution (new road will run close to back door) (83).

Response

Comments noted.

Further note:

DDC Planning Committee has resolved to grant planning permission on this site, subject to a Section 106 agreement to secure development contributions and restrict occupancy to age 55 and over. DOV/20/01569 (The erection of two storey building incorporating 15 apartments (independent living accommodation), communal social areas and associated parking and landscaping).

Land known as former Archway Filling Station, New Dover Road, Capel Le Ferne (CAP011)

Representations have been received from 10 consultees:

Support

- No objection; support (1257, 1261, 1921). 701 conditional support
- Folkestone and Hythe District Council. No objections subject to continued dialogue on the impact of development on schools and health care in the Folkstone and Hythe District (784)

Issue: Location, Character, and Landscape

- Detrimental impact on AONB; the site was previously rejected (448 Capel Le Ferne PC). AONB Unit (296) is concerned that the site is separate and unrelated to the built form, is



undeveloped (reverted to nature), contributes positively to the rural character of the area. The site does not conserve the AONB. However, it is not considered to be Major Development for the purposes of para 177 of the NPPF.

- A large proportion of the site would need to provide a landscape buffer from the AONB. Subject to landscape buffer the PC would support ribbon development (448 Capel Le Ferne PC).
- Concerned that the proposal does conserve and enhance the character and distinctiveness of the settlement (448 Capel Le Ferne PC). What about design and appearance? Grasslands development nearby is a blot on the landscape (1838)
- Loss of trees, habitats and wildlife (1838)

Response:

Comments noted. Criteria C refers to the protection of important trees and hedgerows and the provision of habitat creation and enhancements. An additional amendment at paragraph 4.16 defines 'important'.

Miscellaneous Issues:

- Existing access, so no access concerns (448)
- Proposal would result in increase in traffic.
- Water pressure problems (1838)
- Infrastructure not capable of supporting new development (1834)
- Inappropriate to develop agricultural land given food security issue (1838)
- The proposal does not conserve or enhance the historic environment (448).

Response:

Comments noted

Land at Cauldham Lane, Capel Le Ferne (CAP013)

Representations have been received from 19 consultees:

Support

- Representations 1259 and 1262 support this allocation.
- Representation 794 offers conditional support.
- Folkestone and Hythe District Council have no objections subject to continued dialogue on the impact of development on schools and health care in the Folkestone and Hythe District (784)
- The AONB Unit states that the proposed requirements included in site specific requirements to help manage impacts on the AONB are supported (302)

Issue: Roads, Transport, Movement and Access

- Cauldham Lane is narrow, single width, without pavements; gets congested; unsuitable for additional traffic; dangerous corner; used by (and blocked by) heavy vehicles accessing the farm and industrial units.
- Proposal would result in increase in traffic.
- This site will also impact on the dangerous Cauldham Lane/Capel Street/New Dover Road junction.

- Cauldham Lane is used by walkers (including children and elderly residents) and horse riders accessing the bridle path. There is a blind bend, blind spots, no pull in places; and development would have health, safety and social impact. Consider safety of villagers.
- Reference to a pedestrian connection implies widening of Cauldham Lane, which will increase traffic on this quiet lane.
- Concerned about access to dwelling and parking if Cauldham Lane is widened (1939)
- Sites in Capel Le Ferne could have been considered together to produce a cohesive planning solution, such as widen Cauldham Lane to provide access to SAP44. CAP015 which was rejected would have assisted. CAP013 could provide a requirement to be set back to provide a footpath and road widening (similar to CAP009 planning application).
- Capel Street is narrow; unsuitable for additional traffic; is used to access the school, hall, and chapel.
- Development should be accessed from main roads, not lanes.

Response:

Please see response to highway concerns on page 55 of this Report.

Additional Modification AM74 adds reference to PROW253.

Issue: Infrastructure

- Will increase pressure on utilities.
- Adverse impact on water supply and pressure.
- There are already problems accessing doctors.
- Capel is at its limits, especially the primary school.

Response

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Character, landscape and wildlife

- Concerned that the proposal does not conserve and enhance the character and distinctiveness of the settlement.
- Cauldham Lane is a Lane and should remain that way. Agricultural land should be retained for food production.
- Inappropriate to develop agricultural land given food security issue.
- Number of houses not in-keeping with the lane. We don't want a town.
- Site lies on the edge of the edge of AONB; adverse visual impact.
- Detrimental impact on AONB. Prominent position overlooking the AONB and bridle path and would need significant screening to mitigate the impact.
- Interrupt views (1917)
- Wildlife habitats and redlist species (1834, 1958). Loss of trees, habitats and wildlife (1839, 1917)

Response:

Comments noted.

Other issues:

- Harm to amenity, loss of privacy, overshadowing, loss of light
- Light and noise pollution.



- Concerned there are horses buried on the site.
- Adverse visual impact on quiet rural location and associated mental health impact.
- The land is at a higher level and privacy compromised
- The proposal does not preserve or enhance the historic Issue:
- Detrimental impact on bridle path and would need significant screening to mitigate the impact.

Response:

Comments noted. Policy requires that the existing site boundary trees and hedgerow be retained and enhanced.

East Langdon Site Allocations:

Introduction to East Langdon:

1 Representation has been received from the Following Consultee:

1194 Rosie Cavalier	
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Issue:

- Concerned about categorisation as a larger village. The Parish Council consider that either the categorisation of East Langdon as a larger village should be reconsidered, or the number of dwellings in the proposed site allocation should be reconsidered to ensure that it is sustainable in the context of the lack of local services (977).

Response:

Comments noted. Settlement hierarchy rankings are addressed against Appendix E.

SAP46 Land adjacent Langdon Court Bungalow, The Street, East Langdon:

8 Representations have been received from the following consultees:

506 Michael Arkinstall-Doyle	1020 KCC
801 Langdon Parish Council	1201 Esquire Developments
977 Langdon Parish Council	32 Peter Jull
1216, 1226 Gladman Developments Ltd	

Support

- Site promoter 1216, 1226 supports the allocation. KCC supports the PROW improvements.

Issue: Roads, Transport, Movement and Access:

- Profound impact on the road network.
- Suggested amendment to Criteria f (801)
- Support criteria g because it is essential for safe connectivity, but query how this will be delivered (801).
- It is unclear whether criteria h is related to the site boundary or wider works in the parish. To make them safer? Insert link to SP12 and rural bus services. Criteria waters down Policy TI1. Suggested amendment to Criteria h (801).



- Suggested amendment to criteria i which should seek to improve links to the wider footpath/ cycle network. Suggested amendment to criteria I (801).
- Policy wording should include a requirement for pedestrian access to East Langdon Parish Hall.

Response

Please see response to highway concerns on page 55 of this Report.

Additional Modifications AM76 clarifies access issues adding reference to The Street/ East Langdon Road and to the parish hall and to confirm that the connection should be along The Street.

Issue: Infrastructure

- The allocation should be reconsidered in the context of the lack of local services to ensure it is sustainable.
- Discrepancy between the allocation and SP2 and SP4.
- Profound impact on access to services.

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Housing Needs:

- Concerned about the viability of delivering type type/mix/affordability of homes required to meet local need versus low density housing. Suggested amendment to Criteria b (801).

Response:

Comment noted.

Issue: Trees, Wildlife and Habitats:

- Criteria D and E are contradictory, and it is unclear whether a potential developer will have a responsibility to maintain and enhance the wooded area in the southern corner of the site or only if this only applies if they deem it of sufficient importance or screening. Criteria should be written in a more prescriptive manner to ensure protection, and where possible enhancement of the wooded area to safeguard biodiversity.
- Criteria should be more prescriptive about 'generous landscape buffer' to ensure a wildlife corridor to the wooded area.
- Overall, the plan should seek to combine points C, D and E to ensure a generous boundary to the north and north-west with this linked to (or curved round) the wooded area in the south.
- Query Criteria d and e and the definition of importance. Suggested amended to criteria d and e (801).

Response:

Comments noted.



Additional Modification AM76 provides clarification with regard to trees, hedgerows and woodland.

Other Issues:

- criteria k, reference is required to NE5 because the site falls with Groundwater Protection Zone 2 (801).
- A policy criteria is required that relates to other infrastructure that may be required. Suggested amendment to criteria ‘O’.
- KCC 1020 supports the reference to PROW ER45/56/57 improvements.
- 1201 considers the site undeliverable due to restrictive covenants (consent required from other parties). suggest that Appleton Farm in East Langdon should be selected as an alternative site.
- unclear if settlement confines are to be amended to include the proposed site which would result in isolated dwellings. Suggested new wording for criteria a.

Response:

Comments noted. Clarification added to paragraph 4.275. Policy CC6 gives guidance on this issue.

Additional Modification AM75 updates paragraph 4.275 to confirm that the site is also within Groundwater Source Protection Zone 2.

Additional Modification AM76 adds Insert ‘where appropriate’ to criteria (o).

Lydden Site Allocations:

Introduction to Lydden

No representations.

SAP47 Land adjacent to Lydden Court Farm, Church Lane, Lydden

7 representations have been received from the following consultees:

150 Lydden Parish Council	597 Ceri Davies
272 Kent Downs AONB Unit	714 Anna Cook
596 Katherine Davies	1021 KCC
1735 Icen Projects (on behalf of Quinn Estates)	

Support:

- Quinn Estates (conditionally) supports the proposed allocation (1735)
- Kent Downs AONB states that the site is relatively well contained within the landscape and believes that Criteria C helps manage impacts (272).

Issue: Roads, Transport, Movement, and Access

- There is no suitable access by road apparent in the plan (150).
- Access to the site will have an impact on neighbouring dwellings, especially if all vehicles egress in a southerly direction.

- Pedestrians will have no pathway to the eastbound bus stop as Lydden garage is not a public right of way.
- Criteria g is incorrect. A crossing would be required to access the west bound bus stop.

Response:

See response to highway concerns on page 55 of this Report.

Additional Modification AM77 replaces ‘eastbound bus stop’ with ‘westbound bus stop’ and adds reference to PROW.

Issue: Infrastructure

- There will be a massive issue with the drainage of waste (150)
- There is no village shop or amenities to support future residents (150).
- Limited/no mobile/data service by any provider.

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Amenity and health

- Significant disruption to local residents during construction (150).
- There will be smells and noise from the working farm.
- Impact on the properties to the south of the site has not been taken into account.
- Consideration required during construction to avoid dust / noise / disruption.

Response:

Comments noted.

Issue: landscape and wildlife:

- Policy does not adequately address the impact of development on the AONB.
- Hedgerow on Church Lane is full of wildlife – access needs consideration.
- Policy does not address impact on setting of Grade II listed Church.
- The County Council requests that the policy includes reference to improvements required to ER116 and ER115.

Response:

Comments noted.

Additional Modification AM77 corrects reference to the Grade II* listed church and clarifies that Improvements and/or connections to the Public Right of Way and Bridleway network should be provided, where possible.

Issue: Flood Risk

- There is likely to be substantial flooding during the winter months (150).
- At times of heavy rainfall, Church Lane from the site to Canterbury Road can be under water. This affects cycle and pedestrian access.



- Surface water from all directions courses towards Lydden Pond and then down the current track to the proposed development site. Development will cause additional surface water into this location at its lowest point.

Response:

Comment noted.

Preston Site Allocations:

Introduction to Preston:

1 Representation has been received from the Following Consultee:

1460 Hume Planning	
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Issues:

- The roads are under pressure and DDC is urged to carry out a careful "strategic rural use" study, taking account, of plans in Thanet and Canterbury that impinge on the highways and infrastructure of Preston parish, the growth plans and the protection of the environment, the place and the community (1827).

Response:

Comments noted

SAP48 Apple Tree Farm and north west of Apple Tree Farm, Stourmouth Road, Preston

7 Representations have been received from the following consultees:

1022 KCC	238 Mark Squillaci
1249 Red House Design	1294 Quinn Estates (Iceni Projects)
1466 Hume Planning	1747 Brian Short
1827 Martin Ferber	

Support

- Quinn Estates and Red House Design support the allocation (with conditions).

Issues: Roads, transport, movement and access:

- The village is accessed by inadequate roads under pressures from local, commuter and farm traffic; poor road network.
- Lack of safe pedestrian routes.
- Non-existent bus route, other than for children.
- PRE016: The site is currently accessed through a private road out on to a private road not suitable for traffic.
- Road through Preston from Plucks Gutter to Wingham is not suitable due to increase in traffic.
- Bus service has reduced to an inadequate level, such that car ownership is essential.

Response:

See response to highway concerns on page 55 of this Report.

Issue: Infrastructure

- PRE003 - There is already some housing and a caravan park, so impact on waste water would be less. Only PRE003 should be included.
- Issues with waste water / sewage capacity.
- Limited facilities, school over-subscribed.
- Many incidences of wastewater over capacity in the area.

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Housing needs:

- Although the area requires affordable housing, there is not the need or structure to support the level of growth.
- Affordable housing will be on site PRE016, rather than spread though the Preston Grange development. The proposal now by the developer is for 35 dwellings which is over crowding the plot. There is a need for around 19 affordable housing to meet local needs.
- PRE003 would be sufficient for affordable housing needs and is adjacent to a main road.

Response:

Comment noted.

Other Issues:

- No mention of infrastructure improvements; little infrastructure.
- Any 106 infrastructure requirements should be completed prior to development.
- There are no industrial units on this site.
- 1022 requests that the policy includes reference to the improvements required to Footpath EE480.
- Site stores water to reduce impact of surface water and is needed to prevent flooding (Red Phippen Lane was like a river in November 2022).
- PRE017 is teeming with wildlife, including large mature hedge between PRE017 and PRE016

Response:

Comments noted. Amend paragraph 4.281 and f

Additional Modification AM78 updates/ removes reference to industrial units in paragraph 4.281.

Additional Modification AM79 adds requirement for proposals to provide connections and enhancements to EE480.



Worth Site Allocations

Introduction to Worth

4 Representations have been received from the Following consultees:

815, 1772 Dr Nagy Rafla	1960 Lance Austin
435 Sally Deverill	

Issues:

- Lack of infrastructure and services in the village and the bus service has been withdrawn.
- Parts of the A258 (including a key roundabout) is over capacity (439).
- The Worth Neighbourhood Plan (not due for renewal until 2026) had already planned for new housing. The housing built in the village already exceeds the number on the plan. Object to new allocations. The council should adhere to the Worth Neighbourhood Plan until 2026 (435).

Response:

Comments noted. Please see response to highways and infrastructure concerns on pages 55 and 56 of this Report.

SAP49 Worth Small Housing Sites:

12 Representations have been received from the Following Consultees:

410 Finn's	1023 Kent County Council
429 Marc Jolly	1377 Welburn
437 James Donaldson	1252, 1253 Malcolm Bernandes
446, 492 Canterbury Diocesan Enterprises	1378 Worth Parish Council
490 Carol Gray	1606 Hume Planning

WOR006 Land to the East of Jubilee Road

Representations have been received from 7 consultees.

Support

- 410 supports the allocation with conditions.

Issue: Roads, transport, movement, and access:

- Concerned about increase in traffic, especially with bus service withdrawn (1378).
- On a recent application KCC highways stated that A258 at Worth is at capacity (1378)
- Ribbon development with multiplicity of access point on to principal highway.
- Much of Jubilee Road is too narrow for two cars to pass.
- Significant increase in traffic volumes.

Response

Please see response to highway concerns on page 55 of this Report.

Issue: Infrastructure

- Foul Sewage system is at capacity.

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Location, landscape, wildlife, PROW:

- Open productive farmland outside limits of settlement.
- Impact on views.
- Ribbon development out of character with the village.
- Development would compromise adjoining nature reserves which are important nationally and internationally for birds.
- Kent County Council requests that improvement pedestrian links are provided to the Church and School in respect of Public Footpath ER250. Restricted Byway EE237A, Bridleway EE236, Footpath EE235A will require consideration through well managed Active Travel Plans to upgrade, improve and incorporate (1023).

Response:

Comments noted.

Issue: Flood Risk:

- Flood Zone 2 and 3. Land in Zone 1 is available closer to the settlement.
- Surface water drainage will put the primary school at greater risk when the pond overflows. The school has been evacuated in the past.

Response:

Comments noted.

Additional Modification AM80 clarifies need for improvements and/or connections to the Public Right of Way and Bridleway network to be provided, where possible.

Other Issues:

- Site is not sustainable.
- 446, 492 promotes WOR007 as an Omission site
- Not in accordance with Worth Village Neighbourhood plan which is likely to be renewed prior to 2026. (1252, 1377)

Response:

Comments noted. Omission sites are addressed in Annex 2.

Land to the East of former Bisley Nursery (WOR009)

Representations have been received from 10 consultees.

Support:

1606 supports the allocation with conditions.

Issue: Roads, transport, movement and access:

- Proposed access is inadequate (single track paved area). 490, 429
- Recently lost bus service. 490
- Access to site would impact access to neighbours driveway 429
- Junction of The Street and Jubilee Road is dangerous. A roundabout will be required on the main road 1377



- How will construction vehicles access the site. The current access is over privately owned roads. 1257, 1377
- Significant increase in traffic volumes on Jubilee Road where two vehicles have difficulty passing 1377
- 1378 Worth Parish Council concerned about increase in traffic, especially with bus service withdrawn. On a recent application KCC highways has stated that A258 at Worth is at capacity

Response:

Please see response to highway concerns on page 55 of this Report.

Issue: Infrastructure

- Site would exacerbate problems with water mains, flooding etc. 490
- Water mains are inadequate for the additional load 429
- Foul Sewage system is at capacity 437, 1257, 1377
- Surface water drainage will put put the primary school at greater risk when the pond overflows. The school has been evacuated in the past 1257, 1377

Response:

Please see response to infrastructure concerns on page 56 of this Report.

Issue: Open Space and PROW

- 1023 The County Council requests that improvement pedestrian links are provided to the Church and School in respect of Public Footpath ER250. Restricted Byway EE237A, Bridleway EE236, Footpath EE235A will required consideration through well managed Active Travel Plans to upgrade, improve and incorporate.

Response:

Comments noted.

Additional Modification AM81 clarifies that improvements and/or connections to the Public Right of Way and Bridleway network should be provided, where possible.

Other Issues:

- Not in accordance with Worth Village Neighbourhood plan which is likely to be renewed prior to 2026 (436, 1257, 1377)
- Site has been raised by spoil from the Bisley Site. Stable for construction? (436, 1257, 1377)
- The settlement boundary should be extended to include the site (1606)

Response:

Comments noted.



Smaller Villages and Hamlets: Ringwould, Chillenden, Nonington, Woodnesborough, Staple, Coldred.

Introduction to Smaller Villages and Hamlets Allocations

1 representation has been received from the following consultee. Omission sites are addressed in Annex 2.

2035 Peter Marriott	
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Introduction to Chillenden:

1 representation has been received from the following consultee. Omission sites are addressed in Annex 2.

423 Kevin Holyer	
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SAP50: Land adjacent to Short Street, Chillenden

10 representations have been received from the following consultees:

124 Nicola Clear	477 Richard Himsworth
478 Michael Darby	501 Lesley Richardson
583 Raymond Holyer	747 Andy Beeching
749 Rosalind Beeching	754 Paul Allen
790 Kenny Ingram	1971 Michael Tarring

Issues:

- The issue of surface water flooding within and around the site, see independently commissioned Flood Risk Assessment attached to 747
- Issues with the proposed site access, issues with the proposed access for construction crossing private land. The site is bisected by a passageway known as ‘The Track’ efforts currently underway to secure byway status for the route (583)
- Impacts on biodiversity
- Harm to the character and appearance of the area and also that there is little access to employment or public transport from the site.
- Removal of trees and hedgerows from the site
- Impact of the proposals on the Chillenden conservation area and listed building at The Grange.

Response: *Comments noted*



SAP51: Land opposite the Conifers, Coldred

3 representations have been received from the following consultees:

1551 Shepherdsweil with Coldred Parish Council	1802 Bethan Tredwell
1951 David Oliver	

Support:

1951 supports the allocation, advising that a reserved matters permission is awaited and development will be delivered within 5 year period if granted

Issues:

- Increased traffic
- A lack of sustainable transport options and nearby services
- The site is within a conservation area
- Impacts on wildlife and climate change

Response:

Comments noted

Introduction to Nonington:

2 Representations received from the following consultees:

933 Dr John Garcia-Rodriguez	2010 Janet Gambrett
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Issues:

- 933 objects to development proposed in Nonington (and Aylesham and Elvington) on grounds of lack of amenities and public transport, insufficient highway network and lack of discussions with parish councils.
- In addition to the above reasons, 2010 objects to development proposed in Nonington on the grounds of habitats, water and sewage

Response:

Comments noted.

SAP52: Prima Windows, Easole Street, Sandwich Road, Nonington

5 representations have been received from the following consultees:

36 Andrew Hill	553 Roma Capital Group
729 John Garcia-Rodriguez	1450 RSPB
1557 Cllr Linda Keen	

Support:

553 supports the allocation and the site's availability



Issues:

- Rural pasture land will be developed and 60% of the site is greenfield
- Traffic on local roads will be increased and will affect neighbouring villages too
- Lack of sustainable transport options
- Policy needs consideration of turtle doves which have been identified within 1km of the site
- Amenity of new and existing residents including overlooking
- Disproportionate scale of development
- Heritage impacts insufficiently addressed
- Strip of land in SE of site is owned by consultee and therefore not available
- Infrastructure and local services are lacking. Accuracy of council evidence in this regard is questioned.
- Cumulative impacts of development are a concern. Links to Aylesham and Adisham plans from Canterbury Plan raised as Duty to cooperate issue

Response:

Comments noted. Please see responses on pages 55 and 56 of this Report to infrastructure, highway matters and bus service changes.

See response to SAP24 in relation to links with Canterbury Local Plan.

Additional modifications AM82 and AM83 update supporting text and policy with regard to turtle doves. Policy map to be corrected with regard to site boundary.

Introduction to Ringwould:

2 representations have been received from the following consultees. Omission Sites are addressed in Annex 2.

472 Peter Jull	1195 Esquire Developments
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SAP53: Land at Ringwould Alpines, Ringwould

26 representations have been received from the following consultees:

33 Peter Jull	273 Kent Downs AONB Unit
321 Maurice Webb	362 Robert Botwright
370 Dorothy Webb	509 Nicholas Qusted
537 Ian Williams	577 Geraldine Webb
599 Sharon Danby	625 CPRE Kent
703 Peter Huggins	733 Margaret Huggins
831 Michael Watkins	1095 Dover and Deal Green Party
892 Martha Meyerowitz	1498 Kathleen Walsh
1298 Quinn Estates	1613 Ringwould with Kingsdown Parish Council
1609 Walmer Town Council	1766 Victoria Hughes
1757 Alan & Sarah Gleave	1820 Carolyn Barber
1795 Simon Pollard	1969 Henry Paice on behalf of Kingsdown Conservation Group
1843 Marion Osborne	
1970 Patricia Barrington on behalf of Kingsdown Conservation Group	

Support:

- 273 supports the inclusion of site-specific requirements to retain and enhance boundary vegetation within the policy
- 1298 supports the allocation albeit suggesting that the site capacity should be increased to 12 dwellings
- 33 objects to the omission of RIN006 which has the same constraints/advantages as allocated sites at RIN002/RIN004 and could extend the allocation

Issues:

- The site is greenfield land, but appeared to be labelled in the HELAA as brownfield
- The site is outside the settlement confines whereas the Plan describes the village as being suitable for infill development within confines
- Loss of dark skies and light pollution caused by development
- Noise pollution would be created during construction affecting nearby residents and would also be experienced by new residents from the A258
- The site is within the AONB and its development would therefore impact the AONB setting, and the site has not been sufficiently assessed due to not being included in the landscape sensitivity assessment
- Access onto and off the A258 would be dangerous given traffic levels
- RIN002 was added to the allocation since Reg18 consultation and residents therefore haven't had sufficient opportunity to comment on the proposals
- impacts of the proposed development on wildlife and biodiversity
- Lack of local services and infrastructure, specifically including lack of school places, cuts to bus service, access to shops and medical services
- Lack of mention of affordable housing in policy
- Lack of safe pedestrian crossing over the A258
- Loss of agricultural land
- Housing is not needed in the area given the number of second homes in the parish and the proposed changes to allow local authorities more flexibility in deciding whether to meet their housing need

Response:

In the HELAA tables the site source for RIN002 and RIN004 were listed as 'Brownfield' because the sites had previously been submitted for consideration for the Council's brownfield register. The sites are acknowledged as being greenfield in HELAA Appendix 1A – Housing Site Assessments. Ringwould is described as being suitable for windfall development within its confines at SP4, the residential windfall policy. The site allocation is therefore not assessed against this criterion but instead meets the Council's growth strategy. Other comments noted.



Introduction to Staple:

2 representations have been received from the following consultees. Omission sites are addressed in Annex 2.

830 TG Designer Homes	1907 Andrew Street
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SAP54 Land at Durlock Road, Staple

4 representations have been received from the following consultees:

373 Mrs Shelley Morris	626 CPRE Kent
1799 Caroline Mason	1953 David Parfitt

Support:

- 1953 supports the allocation and confirms the availability of the site

Issues:

- The site is outside the settlement boundary and the site has not been proposed as an exception scheme
- The land should be used for biodiversity offsetting from the neighbouring development site which was not able to provide BNG
- Lack of local services including bus routes being discontinued, no local primary school or jobs, lack of water pressure in the village and flooding of the local roads.
- The site was used for storing materials and machinery during the construction of the neighbouring development but there is nowhere to store these if this site is developed, and
- Access will be opposite existing accesses which will create problems

Response:

Comments noted.

Introduction to Woodnesborough:

SAP55: Woodnesborough Small Housing Sites

2 representations have been received from the following consultee. Omission sites are addressed in Annex 2.

1411, 1413 Mr and Mrs Tobin	
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Development Management Policies

Introduction to Development Management Policies:

2 Representations have been received from the following consultees:

669 Northbourne Parish Council	683 The Dover Society
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Issues:

- Plan should include a list of essential environmentally friendly measures which should be included as standard in all residential new builds eg, insulation, heat pumps, solar panels, sustainable building materials

Response:

Prescription is not possible in this field, which is in any event a matter for building regulations.

- Plan should include policy safeguards that protect the countryside from inappropriate and unsustainable development for all potential non-residential schemes which are not considered employment sites.

Response:

Much of the countryside of this district is covered by environmental designations where SP13 and SP14 will be applied in the first instance. Developments which do not fall to be classified either as residential, employment or tourism uses will be assessed against the NPPF, the NPPG in addition to the policies of this Plan.

- No mention of Section 215 enforcement. Needed in connection with attractiveness of the public realm for locals and visitors, maintenance of conservation areas. Also urge increased use of Article 4 Directions in conservation areas and extension to deprived wards in Dover where necessary.

Response:

Comments noted. The use of Article 4 Directions is referred to in the implementation section of Policy HE2. S215 enforcement notices are not a planning policy matter.

Climate Change

Policy CC1: Reducing Carbon Emissions

15 Representations have been received from the following consultees:

55 Sue Ward	1096 Dover and Deal Green Party
165 Aylesham Parish Council	1357 David Powell
243 Kent Wildlife Trust	1437 Mark Behrendt
275 The Dover Society	1459 Natural England
525 Sharon Danby	1486 Walmer Town Council
538 Jill Griffiths	1618 Sandwich Town Council
685 Deal Town Council	1897 Barrett David Wilson Homes



1064 Robert Hogben	
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Support:

1357, 1459, 1618 find this Policy sound.

Issue: Policy should be more ambitious:

- Plan doesn't do enough to meet target of net zero by 2050 (55, 525, 1064, 1096)
- Future Homes Standard should be delivered in full now (165, 243, 525, 1096)
- BREEAM 'very good' is not ambitious enough and inconsistent with the need to decarbonise at pace and scale (685, 1096, 1486)
- Policy should require all new homes and new non-residential development to be built to achieve net zero carbon. Propose that policy is amended to state that where it can be demonstrated this cannot be delivered on-site, developers should be expected to pay into a carbon off-set fund to be administered by the Council (685)
- Policy wording should be made stronger with 'should's replaced by 'must's (275)
- Policy should require the retrofitting of existing housing stock for renewables and insulation (525)

Response:

This Policy has been strengthened in response to representations received at Regulation 18 stage, in order to tighten the energy-efficiency standards to be required by all new buildings during the lifetime of the Plan. Following the uplift in Building Regulations in June 2022, the full Future Homes Standard is due to come into force in 2025, within the early years of the Plan, according to current government advice. There is no indicative date for the Future Building Standards. In addition, as set out in paragraph 5.6 of the Regulation 19 Submission Local Plan, it is not yet confirmed whether the Future Homes and Future Building Standards will be delivered through the Planning or Building Regulation systems. It is therefore considered that this Policy as submitted represents a sound approach to delivering significant meaningful reductions in emissions across this District, within the context of also needing to demonstrate whole Plan viability.

Issue: Remove Future Home Standard reference:

- FHS will be delivered through Building Regulations. Not justified or effective to include policy that is covered by other relevant legislation (1437, 1897)

Response:

As set out in paragraph 5.6 of the Regulation 19 Submission Local Plan, it is not yet confirmed whether the Future Homes and Future Building Standards will be delivered through the planning or Building Regulation systems. Policy CC1 is therefore considered a sound approach to this important issue until the introduction of the Future Homes Standard.

Issue: Historic Buildings:

- Policy should address changes to historic buildings which also need to mitigate against the effects of climate change (538)

Response:

This is addressed by Policy HE1 of this Plan.



Policy CC2: Sustainable Design and Construction

16 Representations have been received from the following consultees:

277 The Dover Society	1097 Dover and Deal Green Party
283 Dover and Deal Liberal Democrats	1217 Gladman Developments Ltd
334 Kent Wildlife Trust	1358 David Powell
526 Sharon Danby	1385 Jan Gray
628 CPRE Kent	1461 Natural England
969 Sharon Danby	1487 Walmer Town Council
1024 KCC	1561 Nikky Warden
1065 Robert Hogben	1620 Sandwich Town Council

Support:

Representations 283,1024, 1217, 1358, 1461, 1620 find this policy sound.

Issue: should be more ambitious:

- Policy should be more ambitious about green credentials of new housing (1065)
- Plan should require upgrading and retrofitting existing housing stock and build zero carbon homes (334, 969,1385)
- Establish Public Works Local Board to fund upgrading of existing housing stock (969)
- Zero carbon homes should be required. Wording suggested based on Oxford City Council Plan (1097, 1487)
- Policy wording should be stronger (277)
- Paragraph 2.19 should be removed, should be no exceptions to sustainable design (526)

Response:

Comments noted.

Issue: Sustainable Design and Construction Statements:

- More appropriate for detailed applications to be supported by Sustainable Design and Construction Statements rather than all applications (1271)

Response:

Ensuring that measures to mitigate and adapt to the impacts of climate change are embodied in all new buildings built during the lifetime of this Plan is considered a significant issue for this Local Plan. It is therefore appropriate that this Policy applies to all new buildings.

Other Issues:

- Developments should use good layout, orientation and design to maximise natural heating and cooling, major developments should make use of a solar master plan incorporate low carbon or renewable energy generation, and should connect to existing district energy networks or be designed to connect to those to be provided in future (1561)
- Paragraph 5.12 refers to composting and 5.13 to green roofs, neither of which are carried through as policy requirements (628)

Response:

These aspects of sustainable design and construction are included in the criteria of this Policy.

Policy CC3: Renewable and Low Carbon Energy Development

10 Representations have been received from the following consultees:

244 Kent Wildlife Trust	1098 Dover and Deal Green Party
276 Kent Downs AONB Unit	1462 Natural England
686 Deal Town Council	1488 Walmer Town Council
707 Dover Harbour Board	1621 Sandwich Town Council
967 Sharon Danby	1656 Alkham Parish Council

Support

Representations 276, 1462, 1621 find this policy sound.

Issues:

- Renewable energy sources should be standard on all new developments and developments should be required to demonstrate how they have incorporated all positive principles of the energy hierarchy, including reducing emissions, renewables, increased energy efficiency and energy saving (244)
- Policy fails to identify areas where medium or large scale renewable and low carbon energy development would be appropriate (686)
- Policy doesn't mention wind turbine development or potential solar hillside panels (1656)
- Suggest solar canopies over the marshalling yards at the port of Dover (967)

Response:

Policy CC2 addresses requirements for sustainable design and construction methods in new buildings. No sites were proposed for allocation for renewable energy production in Regulation 18 or 19 consultations.

Issue: Alternative Wording:

- Amend wording to encourage developments of renewable and low carbon energy, ensure impacts on heritage assets and landscape setting have been minimised, and that there is no significant impact on wildlife habitats, biodiversity (particularly protected species). (1098, 1488)
- Add new paragraph to policy to encourage maximising opportunities for renewable energy by producing, storing and using renewable energy on-site. support development that provides further energy reductions, efficiencies, or delivers retrofitted renewable and low carbon energy measures on or near existing development sites, encourage the use of Previously Developed Land to provide renewable energy generation or storage to support new and existing development (707)

Response:

This Policy provides clear support for renewable and low carbon energy developments. Impacts on heritage assets and landscapes, wildlife, habitats are already addressed in criterion b of this policy. Other changes to wording suggested are already addressed by this Policy and by Policy SP1.



Policy CC4: Water Efficiency

6 Representations have been received from the following consultees:

527 Sharon Danby	1489 Walmer Town Council
687 Deal Town Council	1497 Environment Agency
1099 Dover and Deal Green Party	1622 Sandwich Town Council

Support

Representation 1497 finds this policy sound.

Issue: Grey Water Harvesting:

- Policy should require grey water recycling and rainwater harvesting in all new development (527, 687, 1099, 1489, 1622)

Response:

Grey water/rainwater harvesting is already supported by this Policy and by Policy CC2 d.

Policy CC5: Flood Risk

10 Representations have been received from the following consultees:

49 Sue Ward	1100 Dover and Deal Green Party
245 Kent Wildlife Trust	1505 Environment Agency
279 The Dover Society	1509 Walmer Town Council
689 Deal Town Council	1553 Shepherdswell with Coldred Parish Council
734 Alkham Parish Council	1657 Alkham Parish Council

Support

Representation 1657 finds this policy sound.

Issues:

- Policy should be slightly amended in order to comply with the NPPF's guidance's definition of a "design flood" (Paragraph:002 Reference ID: 7- 002-20220825) (1505)
- Promote natural solutions to flood mitigation and surface water runoff including the use of SuDS (245)
- Valleys within 3km of settlements should be undeveloped and floor levels should be doubled above flood level in flood zones (1100, 1509)
- Policy should give consideration to the area-wide cumulative impact of existing and planned developments (689)
- Representations 49, 734 and 1553 refer to settlement specific flooding, both water and sewerage, in Whitfield, Alkham and Shepherdswell respectively
- Policy wording should be strengthened (279)

Response:

Additional Modification to clarify definition of a design flood. The use of SuDS is required by Policy CC6. Floor levels are as required by national guidance. Other comments noted.

Additional Modification AM85 clarifies design flood issue.



Policy CC6: Surface Water Management

11 Representations have been received from the following consultees:

50 Sue Ward	1106 Dover and Deal Green Party
166 Aylesham Parish Council	1359 David Powell
690 Deal Town Council	1510 Walmer Town Council
848 Plainview Planning Ltd	1628 Sandwich Town Council
903 River Stour Internal Drainage Board	1658 Alkham Parish Council
1025 KCC	

Support

903, 1025 and 1359 find this policy sound.

Issues:

- Additional wording to include reference to the requirement for the permission of the River Stour Internal Drainage Board for any works affecting any watercourse within it's Drainage District under the terms of the Land Drainage Act (1991) and associated byelaws. (903)
- Remove criteria c or amend to recognise Water Industry Act and that in some instances this type of connection is necessary and will need to be discussed and agreed with the sewer authority (848)
- Policy should require that all neighbours within 500m are consulted about new development and that no development should be granted unless developers contribute to SuDS and/or enhancing infrastructure, culverts and drains (1106, 1510)
- Policy should give consideration to the area-wide cumulative impact of existing and planned developments (690)
- Representations 50 and 1658 refer to settlement specific flooding, both water and sewerage, in Whitfield and Alkham Valley respectively. 1658 notes that higher standards of road maintenance and drain clearance are needed.
- Support for use of SuDS should be prominent in all future development (166)

Response:

Additional modification to include reference to the requirement for the permission of the River Stour Internal Drainage Board for any works affecting any watercourse within it's Drainage District under the terms of the Land Drainage Act (1991) and associated byelaws.

Criteria c is in accordance with Building Regulations. Policy is clear in requiring the use of SuDS in all new development, with the exception of Groundwater Protection Zones 1 and 2. Other comments noted.

Additional Modification AM86 clarifies that the permission of the River Stour Internal Drainage Board is required for any works affecting any watercourse within it's Drainage District under the terms of the Land Drainage Act (1991) and associated byelaws.

Policy CC7: Coastal Change Management Areas

6 Representations have been received from the following consultees:

246 Kent Wildlife Trust	1625 Sandwich Town Council
1264 Rebus Planning	1818 Steve Lucas
1511 Walmer Town Council	1107 Dover and Deal Green Party

Support

Representation 1625 finds this Policy sound.

Issue: Policy is too restrictive:

- Policy is too restrictive. Should revert back to the Regulation 18 version (policy DM8) (1246)
- Policy is not consistent with the NPPF and NPPG which advocate a more nuanced approach to development in CCMA's (1264, 1818)
- Question why a CCMA is necessary here as NPPG advises that a CCMA should be defined where the Shoreline Management Plan is anything other than hold or advance the line, as there will be a high degree of certainty that the existing hold the line policy will continue given the need to protect the main railway line that runs along the coastline (1818)

Response:

This Policy accords with the NPPF and the NPPG and with conclusions and recommendations of the Review of Coastal Change Management Areas carried out by Herrington Consulting Limited for the District Council. The Review provides information for the definition of CCMA's for stretches of coastline within this district to be defined, including due to the potential for long-term policy to become 'no active intervention' in the future.

Issue: Policy is not restrictive enough

- Amend point c) to add 'Will not cause the loss of locally identified biodiversity assets, including Local Wildlife Sites, Local Nature Reserves as well as priority and locally important habitats and species (246)
- Plan would be sounder if any development of over 20 dwellings within 750 metres of the highwater shoreline, and at an altitude of under 12 metres would be expected to contribute to the cost of replacing groynes on our beaches / recharging beaches with shingle (1107, 1511)

Response:

Protection of locally identified biodiversity assets, including Local Wildlife Sites, Local Nature Reserves as well as priority and locally important habitats and species is covered by Policy SP13. Comments noted. Policy wording reflects the recommendations of the evidence base for this issue.

Other Issues:

- The Goodwin Sands provide a natural protection from coastal erosion. As such the Goodwin Sands need protection too and should never be used as a source of gravel (1511)

Response:

The Goodwin Sands are a Marine Conservation Zone and are therefore protected by Policy SP13 f.



Policy CC8: Tree Planting and Protection

25 Representations have been received from the following consultees:

27 Jamie Pout	1108 Dover and Deal Green Party
51 Sue Ward	1218 Gladman Developments Ltd
167 Aylesham Parish Council	1272 Church Commissioners
247 Kent Wildlife Trust	1360 David Powell
289 The Dover Society	1418 Mr and Mrs Tobin
409 Sharon Danby	1463 Natural England
564 Dover Harbour Board	1562 Walmer Town Council
629 CPRE Kent	1571 Nikky Warden
654 Talina Wells	1626 Sandwich Town Council
681 The Woodland Trust	1664 Alkham Parish Council
691 Deal Town Council	1863 Quinn Estates
783 McCarthy Stone	1898 Barrett David Wilson Homes
1026 KCC	

Support

Representations 564, 1026, 1360, 1463, 1626 and 1664 find this policy sound.

Issue: Policy should be stronger:

- Representations 27, 51, 167, 289, 409, 654, 691, 1108, 1562, 1571, 1626 consider that this policy should go further:
 - Should require medium or long term plan to inspect and replace trees to ensure new trees reach maturity and are performing their intended function in mitigating climate change, and to ensure enforcement of this
 - All existing trees and hedgerows should be protected and retained
 - All mature trees should be covered by TPOs
 - Policy should include require the after-care of newly planted trees
 - Should adopt KCC Natural Solutions to Climate Change as planning guidance
 - For every 10,000m² of housing, one area of open space of 150m² and another of 150m² of woodland should be provided
 - New trees should be the right trees in the right place and should be climate resilient Kent species, compatible with KCC Plan Bee
 - Policy should include a target of 30% tree canopy for development sites
 - Strengthen criterion h to require ‘at least two replacement trees’
 - Policy should reflect Wildlife Trust guidance on Local Authority Tree Strategies with a ratio of 2:1 for all but the smallest trees and up to 8:1 for largest trees.

Issue: Policy is too onerous:

- Evidence for criterion a does not justify this requirement (783, 1863)
- Criteria a and d are too onerous (1418)
- Criteria a, b, c, and d should be deleted (783)
- Detailed landscape scheme and management plan (criterion d) should only be required by detailed major applications (1218)
- Policy should be more flexible, including by ‘encouraging’ not ‘requiring’ (564, 1272, 1898)



Response:

It is considered that this Policy as submitted is sound and strikes the correct balance in working to ensure both a significant uplift in the number of trees planted in the district over the Plan period and the protection of existing trees. Care of newly planted trees is addressed criterion d and the requirement for a landscaping scheme to include details of management and maintenance of new landscaping over the lifetime of the development. This Policy complements Policy PM1.

Place Making

Policy PM1: Achieving high quality design, place making and the provision of design codes

20 representations have been received from the following consultees

309 Sport England	565 Dover Harbour Board
630 CPRE Kent	657, 661 Talina Wells
688 The Woodland Trust	1027 Kent County Council
1109 Dover and Deal Green Party	1234 Quod on behalf of Halsbury Homes
1276 Church Commissioners	1361 Lander Planning on behalf of David Powell
1406 Lee Evans on behalf of Mr P & Mrs S Laflin and Rubix Estates	1419 Lee Evans on behalf of Mr & Mrs Tobin
1434 National Grid	1465 Natural England
1513 Walmer Town Council	1650 Rubix Estates on behalf of Mr Colin and Linda Tearle
1676 St Margarets Bay Conservation Association	1718 Walmer Town Council
1894 David Wilson Homes	

Support

309, 565, 630, 688, 1027, 1361, 1406 and 1465 support the policy

Issues:

- Dover town centre should be improved via the public realm improvements suggested, links to tourism and heritage and recognition of Dover’s landscapes and biodiversity
- Dark skies in St Margarets Bay should be protected
- Reference to high quality pedestrian and cycle infrastructure to the LTN 1/20 Standard and reference to PROW and ROWIP within the policy
- 1234 objects on the basis that the Council has not considered the effects of the policy and deliverability and viability of Whitfield Urban Extension
- 1276 requests clarification on what is meant by ‘relevant and appropriate’ in policy introduction and remove any reference to ‘rhythm’
- 1419 objects to the policy on the ground that it appears highly prescriptive and may act to stifle design aspirations resulting in homogeneity of design across the Plan period. Similarly, 1650 argues that PM1 is a useful guide but the large number of criteria may be too onerous on applicants. In this vein, 1894 suggests that design codes should not be taken forward, instead a Local Design Code is produced which is used to inform but not restrict proposals
- 1434 requests an addition to the policy: taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within site.



Response:

Comments noted. Additional modification to clarify requirements for integration with transport modes.

Additional Modification AM88 clarifies requirements for integration with existing transport modes to provide high quality pedestrian and cycle infrastructure (to LTN1/20 Standard3), including PRow connections.

Policy PM2: Quality of Residential Accommodation

14 representations have been received from the following consultees :

294 The Dover Society	719 DHA Planning on behalf of Catesby Estates
769 DHA Planning on behalf of Kitewood	785 The Planning Bureau on behalf of McCarthy Stone
1028 Kent County Council	1110 Dover and Deal Green Party
1219 Gladman Developments	1235 Quod on behalf of Halsbury Homes
1362 Lander Planning on behalf of David Powell	1407 Lee Evans on behalf of Mr P & Mrs S Laflin and Rubix Estates
1420 Lee Evans on behalf of Mr & Mrs Tobin	1514 Walmer Town Council
1652 Mr Colin and Linda Tearle	1719 T Byfield on behalf of Walmer Town Council

Support

Representation 1028 supports M4(2) as the minimum standard for new dwellings. Representations 1362 and 1407 support the policy.

Issues:

- Include change of use conversions to residential within the policy to remedy the problem of inadequate space conversions
- 719, 769, 1219, 1420 and 1652 object to the requirement for all development on sites over 20 dwellings to be in compliance with building regulation M4(2), suggesting altered policy wording which enables this compliance to be optimised while taking into account site specific factors. Further, 785 argues that proposed changes to building regs mean that all dwellings will need to be built to M4(2) standard so d. i) and ii) should be deleted from the policy
- 1235 objects on the basis that the Council has not considered the effects of the policy and deliverability and viability of Whitfield Urban Extension
- 1719 requests that the latest evidence on housing need and market demand should be made available to the planning committee

Response:

Criterion c requires development subject to the Plan to meet the Nationally Described Space Standards. The national permitted development right to convert from Class E to residential excludes

³ [Cycle infrastructure design \(LTN 1/20\) - GOV.UK \(www.gov.uk\)](http://www.gov.uk)



this form of development from the Plan’s provisions, though the government also now requires these conversions to meet nationally described space standards. Other comments noted.

Policy PM3: Providing Open Space

13 representations have been received from the following consultees:

168 Aylesham Parish Council	567 Savills on behalf of Dover Harbour Board
682 The Woodland Trust	786 The Planning Bureau on behalf of McCarthy Stone
1111 Dover and Deal Green Party	1236 Quod on behalf of Halsbury Homes
1273 Savills on behalf of Church Commissioners	1363 Lander Planning on behalf of David Powell
1467 Natural England	1515 Walmer Town Council
1853 Nexus Planning on behalf of RAMAC Holdings	1864 Icen Projects on behalf of Quinn Estates
1894 Savills on behalf of David Wilson Homes	

Support

Representations 1363, 1467 and 1853 support this policy.

Representation 168 welcomes the addition and enhancement of open spaces and play areas via PM3. Two additional questions regarding the IDP and the delivery of projects via partners have been dealt with under the IDP and SP3 respectively.

Issues:

- 567 suggests that open space requirements in the Dover Waterfront site should include water areas and public realm
- 682 requests specific reference to Accessible Natural Greenspace standard and Woodland Access Standard
- 786 argues that open space requirements for older people are much smaller and more localised than PM3 requirements and this should be acknowledged
- 1236 objects on the basis that the Council has not considered the effects of the policy and deliverability and viability of Whitfield Urban Extension
- 1273 and 1894 suggest that PM3 should be amended to reflect that a scheme to secure long term management and maintenance of open space must be secured via planning obligation. 1864 wants to support the policy but asks for an amendment to enable a governance strategy for open space to be conditioned until the detailed phase of the planning process
- 1273 further argues that the policy should give greater flexibility on open space requirements for smaller sites

Response:

Securing of Open Space contributions, including for maintenance, via planning obligations is set out in the Implementation section. Viability issues, on a site-by-site basis can be considered at planning application stages, as set out in SP11. Other comments noted.

Policy PM4: Sports Provision

10 representations have been received from the following consultees:

3 Andrew Howard-Grigg	58 Sue Ward
314, 798 Sport England	787 The Planning Bureau on behalf of McCarthy Stone
1029 Kent County Council	1112 Dover and Deal Green Party
1237 Quod on behalf of Halsbury Homes	1364 Lander Planning on behalf of David Powell
1516 Walmer Town Council	

Support:

Representations 1364 , 1112 and 1516 supports the policy.

Issues:

- 3 suggests an update may be needed if the Playing Pitch Strategy is dated 2015, also Sholden has not seen direct benefit from S106 monies for sports provision
- Developers should provide new and attractive multi use public rights of way to compensate for those lost in development
- 314 and 798 support the policy but notes that PPS data is now 3 years old and suggests it needs to be reviewed
- 787 argues that sports requirements for older people are much smaller and more localised than PM3 requirements and this should be acknowledged
- 1029 advises that the LTA have funding available to improve and refurbish community tennis facilities, and that Active Kent can offer funding and advice on securing sports facilities from schools for community uses as well as helping to fill funding shortfalls to support sports projects and physical activity in the district
- 1237 objects on the basis that the Council has not considered the effects of the policy and deliverability and viability of Whitfield Urban Extension

Response:

The Council's latest evidence on playing pitches (PPS) dates from 2019 and is available in the Plan's evidence base, along with an interim internal review undertaken in 2022 as part of the Open Space Topic Paper. Due to the restrictions and change in use/user data due to covid-19, it has not been considered an appropriate time over the past 2 years to formally update the PPS, but it will follow in due course. A review of the 2016 Indoor Sport Strategy was undertaken in 2022 and is due to be adopted in 2023.

Emerging projects and funding will be reflected in the updated IDP 2023, and on a continuous basis as this is a living document.

Viability issues, on a site-by-site basis can be considered at planning application stages, as set out in SP11.

Other comments noted.



Policy PM5: Protection of Open Space, Sports Facilities and Local Green Space

15 representations have been received from the following consultees:

181, 468 Beat Hochstrasser	396, 1103, 1395 Friends of Betteshanger
788 Sport England	847 Plainview Planning
1030 Kent County Council	1114 Dover and Deal Green Party
1143 David Hawkes	1365 Lander Planning on behalf of David Powell
1471 Natural England	1517 Walmer Town Council
1675 Northbourne Parish Council	1828 Delia Webb

Support

Representation 1030 welcomes PM5 in respect of PRoW. Representation 1471 supports PM5.

Issues:

- 181 and 468 in combination object to PM5 on the ground that a site is promoted within open space in Eastry for one self-build dwelling and the provision of a parking space for the neighbouring dwelling to alleviate congestion
- 788 advises that the assessment of sites provided by the PPS and IFS is robust and can be relied upon in its responses to specific proposals, however the omission of a site from the IFS and PPS does not automatically mean that it is surplus, and any loss of playing pitches must be undertaken in line with Sport England guidance
- 847 objects to the claimed assessment of all designated open space sites and the continued protection of sites WHI009 and Marlborough Road which are promoted for development. Also requests removal of reference to benefit in terms of quantity described at PM5 b)
- 1143 requests that DEA008 Land off Cross Road be removed from the Plan as a housing allocation and designated as protected open space given the previous refusal of development there.
- 1828 argues that AYL002 should also be removed as a housing allocation and designated as open space
- 1395 argues that the policy could be misinterpreted in relation to the protection of 'open space' and this should be more clearly defined

Response:

Comments noted. The policy is considered to meet the definitions and requirements of national policy in relation to the protection of Open Space and Sports. As set out in paragraph 6.75 and the Implementation section, the policy applies to all open space typologies and the list of specific open space designations included within the current evidence base is not definitive, and the policy applies to other land considered to fall within these definitions. Site specific comments addressed under site allocation policy.

Local Green Space Submissions

- 396, 1103 and 1995 relate to Betteshanger Country Park. The comments acknowledge that the site is designated as open space, but there is a lack of clarity around the weight of this and saved policy AS2 from the 2002 Local Plan in view of recent planning applications



affecting the site. The Local Plan should specify how and why DDC’s position has changed since 2002. The site is also proposed for designation as a Local Green Space.

- 1114 objects to PM5 on the basis that it omits Betteshanger Country Park
- 1675 promotes a site known as The Almonry Meadow, The Drove, Northbourne for designation as Local Green Space

Response:

The current Local Green Space assessment is included within the Open Space Topic Paper 2022. Future LGS designation requests will be reviewed as necessary, through formal reviews and/or Neighbourhood Plans.

AYL002 already has planning permission. Local Green Space submission sites are noted in Annex 2 of the Summary Report.

Policy PM6: Community Facilities and Services

5 representations have been received from the following consultees:

631 CPRE Kent	1031 Kent County Council
1113 Dover and Deal Green Party	1518 Walmer Town Council
1555 Shepherdswell with Coldred Parish Council	

Support

Representations 1113 and 1518 support the policy.

Issues:

- 631 advises that the LALP provided for a new community building in the Sholden area and a scheme was approved. This need should be carried forward into the new Plan
- 1031 suggests alternative policy wording to only grant permission for proposals involving the loss or change of use of community services or facilities in exceptional circumstances, and that reference at 6.98 to maximising shared use of facilities should be added to policy wording
- 1555 objects to the policy as community facilities in Shepherdswell and Coldred are inadequate for the scale of additional development proposed, and that the parish council would like improvements to the village hall and its parking facilities, the recreation ground, cemeteries and local school to be secured via S106 agreements

Response:

Community requirements for facilities are addressed by the IDP/IDS which are live documents and as such will continue to evolve in liaison with stakeholders as needs are understood. Other comments noted.

Additional Modification AM90 clarifies that permission for proposals involving the loss or change of use of community services or facilities will only be permitted in exceptional circumstances and adds maximising shared use of facilities to policy wording.



New Homes

Policy H1: Type and Mix of Housing

28 representations have been received from the following consultees

172 Aylesham Parish Council	1032 KCC
274 Dover and Deal Liberal Democrats	1115 Dover and Deal Green Party
497 Dover and Deal Liberal Democrats	1158 DHA Planning on behalf of Guardian Parks Ltd
529 Sharon Danby	1220 Gladman Developments
568 Dover Harbour Board	1238 Quod on behalf of Halsbury Homes
633,627 CPRE Kent	1366 Lander Planning on behalf of David Powell
709 Richard Henchley	1408 Lee Evans on behalf of Mr & Mrs Laflin and Rubix Estates
716 DHA Planning on behalf of Catesby Estates	1421 Lee Evans on behalf of Mr & Mrs Tobin
767 DHA Planning on behalf of Kitewood	1540 John Lonsdale on behalf of Walmer Town Council
780, 781 The Planning Bureau on behalf of McCarthy Stone	1669 Rubix Estates on behalf of Mr Colin and Linda Tearle
807 Langdon Parish Council	1720, 1726 Cllr T Byfield on behalf of Walmer Town Council
874 Martin Garside	2041 David Reid
946 Foster & Payne	

Support:

Representations 568, 1032, 1158, 1220 and 1366 support this Policy.

Issues:

- Homes should be provided which are suitable for disabled people or can be easily adapted
- Environmentally friendly measures should be included as standard in all new builds including insulation, heat pumps, solar panels and sustainable building materials
- Nil affordable housing in Dover town
- A lack of provision for specialist older persons' housing. 497 and 946 raise the issue specifically in the context of Sandwich and Whitfield Urban extension respectively
- The dwelling size mix in 7.3 should be higher for one and two bedroom dwellings and lower for three and four bedroom
- A local connection test should be included for housing linked to an assessment of the scarcity of housing for local economically active people
- Policy wording should be amended to say 'has had regard to' instead of 'reflects' Council's latest evidence of housing need and market demand. Also requests the addition of a reference to mix being balanced against meeting other design requirements such as those in Policy PM1
- More social housing should be provided at zero-carbon standard.
- The Council should require developers to provide schemes including affordable housing in Dover before granting permission within 3km of Deal and Walmer



- The policy should cross-refer to the Whitfield SPD and take into account what has already been delivered at Whitfield and the future pipeline rather than applying district-wide requirements
- The policy should signpost applicants to an appropriate evidence base/updated SHMA
- The policy should refer to prefabricated housing
- Single houses in large grounds shouldn't be redeveloped to pack a mix of house types onto the site

Response:

Comments noted. A response to Affordable housing and Dover Nil requirements can be seen at SP5. Policy PM2 addresses the needs of adaptable homes. The policy and implementation section already refers to the need for an assessment of the latest available evidence of need and signposts which documents should be reviewed. The term 'reflects' is considered appropriate in that the interpretation of this is explained within 7.6 and requires some flexibility depending on the nature of the site, location, proposals and latest evidence.

Policy H2: Rural Local Needs Housing

8 representations have been received from the following consultees:

280 Kent Downs AONB Unit	634 CPRE Kent
1033 KCC	1116 Dover and Deal Green Party
1277 Savills on behalf of Church Commissioners	1367 Lander Planning on behalf of David Powell
1681 John Lonsdale on behalf of Walmer Town Council	1722 Cllr T Byfield on behalf of Walmer Town Council

Support

Representations 280 and 1367 support this policy

Issues:

- There should be an additional criterion to ensure that the development can access nearby services and facilities by active travel modes on safe routes and connectivity between existing and new communities should be considered further
- AirBNB owners should be made to register with DDC
- Reference is not made to community housing organisations as alternative providers of housing schemes
- Phrase: 'subject to a viability assessment' should be added to final paragraph of policy
- No Local Housing Needs survey for Walmer has been produced
- No evidence has been produced by DDC in relation to conserving AONB or Heritage Coast
- DDC traffic surveys are out of date with no evidence that developments will contribute to the cost of road improvements



Response:

Comments noted. Airbnb issue is a national issue. The policy does not state that sites cannot come forward from community housing organisations. Para 7.13 refers to community organisations. Paragraph 7.19 sets out clear requirements for viability assessment.

Additional modification AM92 adds clarification to the factors that will be taken into account when determining applications for local needs housing.

Policy H3: Meeting the Needs of Gypsies and Travellers

7 representations have been received from the following consultees:

76 Cllr David Beaney	727 Alkham Parish Council
281 Kent Downs AONB Unit	842 Alison Heine
1117 Dover and Deal Green Party	1682 Walmer Town Council
1783 Mairi Jones	

Support

Representations 1117 and 1682 support this policy.

Issue: ARC4 2018 GTAA and Allocations:

- ARC4 2018 GTAA is now out of date and the Site Options Review was not a proper update. The study does not meet the requirements in PPTs (par 7 (c) for a robust evidence basec
- The need for 42 pitches has been demonstrated at appeal to underestimate the true need in this district. The Council has never provided information to show that turnover on sites can be relied on to meet need (842).
- Unclear is the approach taken by Dover incorporates the findings of the Lisa Smith Judgement. However according to the 2018 GTAA there was a significant need for those who did not meet the PPTS planning definition and who have not to date been provided for on any sites granted permission since 2018 (842).
- The 2018 GTAA identified a need for 30 pitches, 18 of which would be PPTS and a need to front load this with provision of 15 pitches within the first 5 years. The number of pitches granted since 2018 has already exceeded in the 2018 report for those complying with the PPTS need and there remains an outstanding need. The Arc study only assumed 6 pitches for in-migration for Irish Travellers but the number of permissions granted exceeds these assumptions and is more evidence of underestimated need (842).
- It is not clear why the council is only proposing to allocate sites for 5 pitches when there are numerous undetermined applications, including renewal applications (842)
- Additional pitches need to be allocated to address existing and future need in Dover (842).
- There is a need for transit provision. Many Travellers pass through Dover to the continent (842).
- Alkham has many traveller residents who partake in village life, query where the other 37 sites will be accommodated as windfall proposals sites have not been identified (1783).

Response:

The Plan seeks to meet the cultural and PPTS needs in accordance with the judgement. The GTAA is not considered to be out of date. The Council has sought to identify as many sites as possible to meet



the need. Even if specific sites were identified to meet the full need, windfall proposals would still come forward. See Housing Topic Paper Update 2023.

Issue: Romany Acres Omission Site:

- Omission Site known as Romany Acres. This was withdrawn at Reg 19 with no justification (76).

Response:

Comment noted. This site was discounted due to harm to the Area of Outstanding Natural Beauty.

Issue: Half Acres:

- Kent Downs AONB do not object in Principle to the Half Acres site. It will need strong vegetative screening along the southern boundary and bolstered screening along the northern boundary to ensure compliance with the requirements in paragraph 176 of the NPPF (281).
- Alkham Parish Council object to the Half Acres site for the following reasons: 1. This site was not identified for consultation in Regulation 18. 2. Currently only granted permission for personal use. Not as a gypsy and traveller site. 3. The site lies in the open countryside within a designated Area of Outstanding Natural Beauty. 4. It can be seen from within the AONB and has high visual impact. 5. There is no evidence of need/requirement. 6. There are already significant problems with traffic. The parish council contends that this proposed intensification will have unacceptable impacts on the character, appearance and visual amenity of the locality (727).
- The site at Half Acres, Alkham was granted permission on appeal earlier in 2022. It is surprising that the Council is now conceding that a site refused permission for 1 pitch is now suitable for 3 pitches. This is a private family site. The additional pitches would be for a need not identified in the 2018 ARC study (842).

Response:

Comments noted.

Issue: Size of pitches

- Agree that a pitch should be approximately 600sqm in size. There should be room for more than a static caravan. Many Travellers want twin-unit mobile homes. Does the Council agree that permissions granted at Hay Hill and Alkham Valley should not count as pitches as they were not for self-contained pitches as defined by the council (842).

Response:

Comment noted.

Additional Modification AM93 provides clarification on the issue of capacity and density of pitches.

Issue: Need for two policies:

- Is there a need for two policies H3, H4 when they seem to address the same matters (842).

Response:

Comment noted. Policy H3 effectively allocates 5 pitches.



Policy H4: Gypsy and traveller windfall accommodation

2 Representations have been received from the following consultees:

284 Kent Downs AONB Unit	1015 Alison Heine
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See also comments at Policy H3 under issue: [ARC4 2018 GTAA and allocations](#).

Issue: Need for two policies:

- 1015 Is there a need for two policies H3, H4 when they seem to address the same matters. See other comments on H3 (1015)

Response:

Comment noted. H3 identifies suitable sites for intensification.

Issue: Impact on AONB:

- Criterion e) does not align with the requirement contained within the NPPF that ‘great weight’ be given to the conservation and enhancement of landscape and scenic beauty in AONBs and instead reflects lesser requirements set out in the NPPF for proposals within the AONB setting (284).

Response:

Noted. Additional Modification to clarify NPPF wording for AONBs added.

Additional Modification AM96 clarifies the wording with regard to applications affecting the AONB to ensure it aligns with the NPPF.

Policy H5: Self-build and Custom Housebuilding

8 representations have been received from the following consultees:

1118 Dover and Deal Green Party	1221 Gladman Developments Ltd
1368 Lander Planning on behalf of David Powell	1683 John Lonsdale on behalf of Walmer Town Council
1734 Quinn Estates	1741 Quinn Estates
1865 Quinn Estates	1926 Quinn Estates

Support

Representation 1368 supports the policy

Issues:

- Zero/low carbon builds are not incentivised
- An amendment should be made to state that if a plot has not sold for 12 months it can be developed as market housing
- The policy should allow for self and custom housebuilders to make off-site contributions towards affordable housing where this is impractical/unviable to provide on site



- The Council’s evidence understates the District’s demand for self-build plots, relying on responses from people who were previously on the register in 2016 and a lack of publication since

Response:

The Council has taken steps to facilitate self and custom-build housing including the appointment of an officer in the Housing team to advise on self and custom-build housing, and the offering of free training courses to members of the public to build knowledge on the issue. This work has been supported by the Local Plans team. The Council’s evidence is therefore considered to reflect demand. Other comments noted.

Policy H6: Residential Extensions and Annexes

2 Representations have been received from the following consultees

1119 Dover and Deal Green Party	1684 John Lonsdale on behalf of Walmer Town Council
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Issue:

- The policy wording should require thorough consultation with residents due to recent overdevelopment and congestion in coastal towns.

Response:

Comment noted.

Policy H7: Houses in Multiple Occupation

5 Representations have been received from the following consultees:

293 The Dover Society	1120 Dover and Deal Green Party
1685 Walmer Town Council	1723 Walmer Town Council
2039 David Reid	

Issues:

- Impacts of HMOs should be considered on the wider area, including not being permitted in listed buildings, conservation areas or in close proximity to other HMOs
- The policy wording should be altered to require an assessment of the safety of utility connections
- Dover should adopt a policy on AirBnBs as it is unclear whether H7 refers to these
- Single houses in large grounds shouldn’t be redeveloped to pack a mix of house types onto the site

Response:

The Council’s evidence does not establish concentrations of HMOs in the District so their wider effects are not considered significant. The safety of utility connections within HMOs would be dealt with under Building Regulations.



Employment and the Local Economy

Policy E1: New Employment Development

11 representations have been received from the following consultees

285 Kent Downs AONB Unit	569 Dover Harbour Board
514 Dover and Deal Liberal Democrats	635 CPRE Kent
986 Northbourne Parish Council	1034 Kent County Council
1121 Dover and Deal Green Party	1660 Alkham Parish Council
1686 Walmer Town Council	1778 Mairi Jones
1867 Quinn Estates	

Support

Representations 8285, 568, 986, 1660 and 1778 support this policy.

Issue: Travel and Movement:

- An additional criterion is sought to require active safe travel routes to sites that are adjacent to existing or new communities (635).
- The policy should include reference to the need for sustainable Active Travel options, safety for Non Motorised Users (NMUs) on rural roads and sustainable infrastructure to link to transport hubs, and local facilities, avoiding short car journeys (1034).

Response:

Comments noted.

Issue: Green Economy:

- Insert the following text: “A priority will be given 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” (1121, 1686).
- The policy would be more sound if floor space under solar panelled roofs incentivized, with lower business rates (1121, 1686).
- The policy would be more sound with the addition of the following text: ‘all large out-of-town developments should include co-working spaces, directly adjacent to car-club spaces and electric bike parking. 8.10 Sound (1121, 1686).
- To assist SMEs survive it would make sense to direct them to rock bottom loans to install solar roof panels (1121, 1686).

Response:

Comments noted.

Issue: Employment Development in Deal:

- Plan is not positively or proactively allocating land to meet the need for employment development in Deal. Text should be changed to include development on land on a main road leading into a designated settlement. (1867)



Response:

Comment noted. This Representation relates to an Omission Site. Omission Sites are recorded in Annex 2.

Issue: Employment development in Alkham:

- No reference is made to the proposed growth of rural enterprises or rural workshop spaces in the Alkham area within the Dover Plans (1778).

Response:

Comment noted. Policy E1 promotes and supports rural employment across the district.

Other Issues:

- Reference to Kent Farmsteads Guidance welcomed (1034)

Response:

Comment noted.

Policy E2: Loss or Redevelopment of Employment Sites and Premises

4 representations have been received from the following consultees.

121 Vince Croud	291 The Dover Society
1122 Dover and Deal Green Party	1687 Walmer Town Council

Issues:

- Allocation of land for employment (Pike Road Industrial Estate) in Eythorne and Elvington has not been met with success. The existing businesses are not likely to be attractive to residents and more of the same will not adequately provide opportunities (121).
- Welcome the reuse of former employment sites for housing (particularly social housing) (291). Conversion or rebuild of rural buildings for Economic Dev. Purposes: this minor accommodation is welcome, allowing indoor office space (1687).
- The Policy would be sounder if there were protection of outdoor farmland and woodland as locations of employment. There is a need for both office space and also fields, woods, reactivated coppicing sites or sites of agri-forestry. (1122, 1687).

Response:

Comments noted. The planning system does not have a significant role in the detailed growing strategies or business formats of agriculture, horticulture and forestry activities.

Policy E3: Businesses Operating from a Residential Property

2 representations have been received from the following consultees:

1123 Sarah Waite- Gleave	1688 Walmer Town Council
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Comments are considered against Policy E2 (1122 and 1687)



Policy E4: Tourist Accommodation and Attractions

14 representations have been received from the following consultees:

56 Sue Ward	520 Alkham Valley Society
287 Kent Downs AONB Unit	570 Dover Harbour Board
324 The Dover Society	899 Debbie Turner
516 Dover and Deal Liberal Democrats	968 Sharon Danby
1035 Kent County Council	1124 Dover and Deal Green Party
1308 Bettshanger Country Park (agent Icen Projects)	1315 The Seahive
1689 Walmer Town Council	1868 Quinn Estates

Support

Representations 287 and 570 support this policy.

Issue: Loss of touring caravan sites

- Whitfield Expansion will affect the 3 Certified locations for touring caravans on Singledge Lane, these locations are used by tourists to stay overnight before travelling to the port, or for longer visits access to historic sites and the countryside (56).

Response:

Policy E4 set out the criteria against which to assess new touring caravan sites.

Issue: Sustainable travel and the PROW network

- The County Council requests specific reference to sustainable transport options within this section as well as reference to the ROWIP (1035).

Response:

Sustainable travel options are already referred to in the Policy and ROWIP is covered under policies TI1 and TI2, therefore it is not necessary to repeat here

Issue: Bettshanger Country Park

- Bettshanger Country Park would like the Reg 18 text to be reinstated so that part 1b of the policy to allow serviced visitor accommodation to be located 'within or adjacent to an existing visitor attraction or accommodation site'. This change is not positive or justified (1308, 1868).
- Increasing numbers of tourists puts pressure on landscapes and habitats, infrastructure and only provides seasonal work. Dover District has indicated its support for development of Bettshanger Country Park (hotel and surf lagoon) proposal is contrary to agreement in 2004 via a S106 to designate a local nature reserve here. Contrary to national policies on biodiversity (899).

Response:

It is considered that the policy finds the appropriate balance between supporting the expansion and diversification of tourism whilst also protecting the qualities of the District which make it attractive to tourism in the first place, and ensuring proposals are appropriately located to provide access can be provided by a range of means of transport.

Proposals at Bettshanger Country Park relate to current planning applications under consideration.



Issue: Alkham Valley

- Alkham Valley is a tourism attraction for walking cycling and horse-riding. Roads are already dangerous and would get worse. Traffic should be redirected to intended major routes and the traffic slowed down (520).

Response:

Impact upon Alkham Valley Road has been assessed and potential mitigation identified.

Other Issues:

- No mention of Section 215 enforcement anywhere in the plan to remedy the problem of existing problems (324).
- Anomalies like Lydden Race Circuit located in the AONB should not be permitted in the future. Any development at such attractions should be carefully scrutinised and residents’ concerns listened to before being approved (516).
- AirBnB owners should registered with the council and pay Council Tax (968, 1689, 1124).
- A coach park with toilets is needed in Dover (1689, 1124).
- DDC regeneration take greening of the economy more seriously and look at smaller zero-carbon transport activity projects within Dover town; harbour trips with zero carbon, solar-powered boats (1689, 1124)

Response:

See responses to Policy SP6 regarding comments on the green economy and Air B&Bs. Other comments noted.

Additional Modification AM98 adds clarification to the supporting text of this Policy.

Retail And Town Centres

Policy R1: Primary Shopping Areas

2 Representations have been received from the following consultees:

507 Dover and Deal Liberal Democrats	1627 Sandwich Town Council
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Issue: Sandwich Primary Shopping Area:

- The primary shopping area should be widened to extend the SP10 boundary to include Strand Street, Delf Street, The end of the Butchery, Potter Street and Harnett Street (1627).

Response:

Comment noted.

Issue: Use of upper floors:

- This policy should be amended to state that Sandwich Town Council will support proposals to bring upper floors back into use, including for residential and office use, unless the current use is for retail and the business is viable and valued by the local community. Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Areas and this will prohibit the loss of any square metres of viable retail space on ground floors (1627).



Response:

Comment noted. Bringing 'upper floors back in to use' refers to upper floors that are not currently used, or are perhaps underused for retail storage.

Other issue:

- 507 Reward high street shops for environmentally sustainable behaviour regarding shop fronts, lighting, design etc (507).

Response:

Comment noted.

Policy R2: Sequential Test and Impact Assessment

3 Representations have been received from the following consultees:

571 Dover Harbour Board	1126 Dover and Deal Green Party
1690 Walmer Town Council	

Issue: Dover Waterfront:

- The policy should clarify that in locations (such as Dover Waterfront) where there is already a significant amount of floorspace in retail and town centre uses, proposals for development / re-provision for such uses will not be required to satisfy sequential test requirements (571).

Response:

Comment noted.

Issue: Modes of Travel:

More could be done to incentivise modes of travel other than the private car, for example out of town park for electric hopper buses with solar canopy for charging direct from solar (1126, 1690).

Response:

Comment noted.

Policy R3: Local Shops

1 Representation has been received from the following consultee:

1629 Sandwich Town Council	
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Issue: Supporting Commercial Premises:

- Commercial premises should be supported and encouraged, and new commercial ventures should be given a financial incentive (1629).

Response:

Comment noted



Policy R4: Shop Fronts

1 Representation has been received from the following consultee:

1632 Sandwich Town Council	
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Issue: Supporting commercial premises

- Commercial premises established or vacant should remain commercial and not be permitted to convert to domestic. Should positively reflect and contribute to the character and vitality of this medieval town (1632).

Response:

Comment noted.

Transport and Infrastructure

Policy TI1: Sustainable Transport and Travel

11 Representations have been received from the following consultees:

502 Dover and Deal Liberal Democrats	1163 National Highways
549 / 883 Glyn Jones	1633 Sandwich Town Council
636 CPRE Kent	1673 Alkham Parish Council
1037 Kent County Council	1693 Walmer Town Council
1131 Dover and Deal Gren Party	1791 Mairi Jones

Support

Representations 1037 and 1163 support this policy. Representation 636 supports the intentions of criteria (a), (b) and (c) and safeguarding the rights of way network.

Issue: Walking and Cycling:

- Improve Cycle routes – there are gaps in network (502) Thought should be given to additional paths and cycle routes and bridleways along the Valley and creating a recreational resource (1673)
- Changing facilities needed for cyclists needed (502)
- Important that there are active travel routes to nearby facilities and that they are safe, lit (to be safe for women, Children and young people) and have firm surfaces (not mud paths) (636)
- Proposed amendments suggested: “**All new homes** must 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..” and “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.” (1131, 1693)

Response:

The policy does address need for engineered, safe and direct routes under d) and encourages enhancements to the networks. Policy is unable to require changing facilities without site specific information.

Additional Modification AM99 adds reference to bus shelters in response to representation made against SP12.

Other Issues:

- Encourage operators to introduce network wide ticketing system (502)
- Vital that High Speed trains return to Sandwich (1633)
- Object to T11 on grounds it doesn't address highway network traffic and safety issues or port traffic (549, 883)
- Consider the ongoing maintenance costs of new routes.

Response:

Comments noted, these matters cannot be addressed through this policy.

Policy T12 - Transport Statements, Assessments and Travel Plans

9 Representations have been received from the following consultees

838 Nonington Parish Council	1369 Lander Planning on behalf of David Powell
950 Dover and Deal Liberal Democrats	1634 Sandwich Town Council
1038 Kent County Council	1649 Wingham Parish Council
1132 Dover and Deal Green party	1694 Walmer Town Council
1164 National Highways	

Support:

Representations 1164 and 1369 support this policy

Issue: Terminology and detail of policy:

- Not clear what 'inappropriate' 'unsuitable' or 'severe' mean (838)
- Transport Assessments and Travel Plans must include consideration of the PRoW network and the ROWIP (1038)
- Policies in relation to traffic assessments and travel plans must be clarified (1649)

Response:

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.

PRoW are specifically referenced in para 10.10 and relevant strategies for walking referenced in 10.15 as consideration.

Issue: Transport Assessment requirements

- Proposed modifications to supporting text submitted relating to SRN and DfT Circular 02/2013 and engaging with National Highways (1164)

Response:

Comment noted.

Additional Modification AM101 adds reference to the DfT Circular.

Issue: Travel Plans

- Remove word 'desirable' from 10.10 – need for travel plan is essential. (950)
- Require Travel Plan for all developments of more than 15 homes (1132)
- Support the continued use of Travel Plans as a way of promoting sustainable travel. Propose additional wording on supporting text relating to details to be included within Travels plans (1164)

Response:

The word 'necessary' follows 'desirable' in 10.10 and therefore it adds flexibility to the requirement. 10.15 lists factors which are taken into account.

Additional modification AM101 clarifies what information a Travel Plan should contain.

Issue: Specific Highway/Modelling/route issues:

- Robust modelling needed for B2046 (838)
- Include the separation of freight from local traffic on the A2, A20 and A256, protected cycle-paths and cycle links from Whitfield to Kearsney and Martin Mill stations, Elvington to Shepherdswell station, pavements from bus stops to any development of 8 or more homes in villages, and the funding of bus routes to be secured by any development in villages (1132, 1164)
- Consideration should be given to Sandwich's visitors arriving by coach. Consideration should also be given to limited parking provision within the town and feasibility and viability of a further car park is necessary. (1634)
- Concerned that residential developments will be approved where highways issues have not been fully considered (Specific Wingham issues and junctions are detailed) (1649)
- Suggested projects made including road improvements and several other specific infrastructure projects (1694)

Response:

It is not the intention of this policy to address specific projects and requirements for mitigation in relation to highways and/or other travel methods, but to set the overall requirements for planning applications to address. Traffic modelling and consultation with the Local Highway Authority, National Highways and other relevant consultees has been undertaken and specific projects are detailed within the IDP. They will be further consulted on specific issues arising from TA/TS/TP at planning application stages.

Additional Modification AM101 adds further explanation to the approach to transport planning and modelling.



Policy TI3: Parking Provision on new Development

10 Representations have been received from the following consultees

108 St Margaret's at Cliffe Parish Council	1370 Lander Planning on behalf of David Powell
173 Aylesham Parish Council	1409 Lee Evans on behalf of Mr P & Mrs S Laflin & Rubix Estates
295 The Dover Society	1422 Lee Evans on behalf of Mr and Mrs Tobin
572 Dover Harbour Board	1670 Rubix Estates on behalf of Mr Colin and Linda Tearle
1133 Dover and Deal Green Party	1695 Walmer Town Council

Support

Representations 572, 1370, 1409, 1422 and 1670 support this policy.

Issues:

- The parking provision policy urgently needs updating to match demographic development and for rural areas should be 1 space per bedroom (108)
- Developments should allow for independently accessible parking spaces (as opposed to tandem spaces) and that car ports or garages are not included as parking (173)
- Allowing developments with no parking provision may be environmentally attractive, but it is simply not realistic in terms of people's behaviour and lifestyle.(295)
- Add to policy: applicants should limit off-street parking to space for a maximum of 2 cars per dwelling, and in some congested coastal town sites, 1 car per dwelling (1695)

Response:

As stated in the policy and supporting text, the guidance is used as a starting point. Further parking strategies will be undertaken and the policy allows for the most recent to be considered. 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.

Policy TI4: Overnight Lorry Parking Facilities

7 Representations have been received from the following consultees:

288 Kent Downs AONB Unit	1135 Dove rand Deal Green Party
504 Dover and Deal Liberal Democrats	1165 National Highways
705 Dover Harbour Board	1696 Walmer Town Council
866 Strutt and Parker on behalf of Nigel Snape	

Support:

Representations 288, 504 and 1165 support this policy.

Issue: Inland Terminal and A20 exclusion:

- Harbour Board intend to deliver an inland terminal and lorry parking is compatible and complementary. Inland terminal is needed for easing pressure on the port. EU Entry / Exit System (ESS) is a further drive to achieve this goal. Proposes amendments to Policy TI4 so



that it includes an area of search for the co-joined Inland Terminal and Lorry Park. East of Roundhill Tunnels (A20 corridor) is the most appropriate location (705)

- Policy T14 (a) should be amended as follows: "The site must be accessed from the Strategic Road Network (A2/M2 corridor or A20). Sites along the A2/M2 corridor should also be complimentary to the A2 Improvements." (866)
- Policy T14 (b) should therefore be amended as follows: "Planning applications must be supported by a Landscape and Visual Impact Assessment which in turn should support the proposed layout of the site and its capacity. Development within the AONB will be supported where it complies with the provisions of the NPPF relating to major development in the AONB. " (866)
- AONB should not be excluded from the search due to exceptional circumstances and public interest. (705)

Response:

This policy is intended to cover only lorry parking, as required by national policy. The issue of Inland Terminals is not considered to be a Local Plan matter, particularly without supporting evidence to support a policy approach at this time. Therefore, it is not proposed to update the policy itself to include Inland Terminals, however the Council appreciates that there is a potential need and that this may need to be located within the A20 corridor within and/or within the setting of the AONB.

Additional Modification AM102 clarifies that the policy itself does not apply to proposals for an Inland Terminal, and that proposals for a facility on the A20 corridor within the AONB, would be assessed against national policies.

Other Issues:

- Consider appropriate safeguards for the AONB and its setting within criterion b (288)
- Suggestion to preclude development for lorry parking within 300m of a residential street, school or preschool (1135, 1696)

Response:

The Policy already makes clear at b that sites must not be within the AONB or impact on the setting. In addition, proposals that come forward would need to meet the tests set out in national policy (and Policy NE2 of this Plan) in relation to major development in the AONB. Other impacts of proposals, such as proximity to residential uses will be considered as part of a planning application as set out in paragraph 10.33.

Policy T15: Digital Technology

6 Representations have been received from the following consultees:

803 Langdon Parish Council	1655 Alkham Parish Council
1039 Kent County Council	1697 Walmer Town Council
1136 Dover and Deal Green Party	1780 Mairi Jones

Support

Representation 1697 supports this policy. Representation 1039 supports this policy with additional notes including reference to new Building Regulations.



Issues:

- In the context of the aims of ‘larger’ villages to support viability of these settlements – include a requirement to invest in this infrastructure being made available more widely? (803)
- Slow broadband in district (1697, 1780 and 1655)
- A key issue which has been omitted is the development of a WIRED District (1655, 1780)
- Need for co-working spaces (1697, 1136)

Response:

The aim of the policy is to improve the connections and speed across the district. The introduction of Building Regulations in late 2022 (Approved Document R) has now superseded the policy requirement for gigabit capable connections and high speed ready buildings.

Additional Modification AM104 updates the supporting text, Policy and implementation sections in accordance with the introduction of new Building Regulations in late 2022 which supersede the requirements for gigabit capable connections to be included in detail within the Local Plan policy.

The Natural Environment

Policy NE1: Biodiversity Net Gain

21 Representations have been received from the following consultees:

292 Kent Wildlife Trust	1138 Dover and Deal Green Party
408 Susan Sullivan	1222 Gladman Developments Ltd
513 Dover and Deal Liberal Democrats	1339 The Land Trust
539 Sharon Danby	1371 David Powell
638 CPRE Kent	1392 Susan Sullivan
692 Deal Town Council	1448 House Builders Federation
694 The Woodland Trust	1473 Natural England
717 Catesby Estates	1567 Walmer Town Council
768 Kitewood	1663 Alkham Parish Council
806 Langdon Parish Council	1705 Walmer Town Council
1041 KCC	

Support:

Representations 513, 1339, 1371, 1473 and 1663 find this policy sound.

Issue: Policy should require 20% BNG:

- Representations 292, 638, 692, 694, 1138, and 1567 request the Policy reflect the position of the Kent Nature Partnership and require delivery of a 20% increase in BNG.
- Representation 1041 echoes this with the added provision “where viable to do so.”

Response:

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 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.

Issue: Policy Requirements:

- Policy requirements should be more flexible (1222, 717)
- Policy should provide details of how the percentage will be measured (292)
- Amend d: “to be secured, managed and maintained for a minimum of 30 years after completion, and must achieve the distinctiveness and condition as intended” (292)
- Policy should be amended to require that planning permissions which are subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, will need to agree to abide by ‘robust auditing’ (1705, 1138)
- clarity sought regarding paragraph 2 of the policy – “*Biodiversity net gain must be in addition to any form of compensation*” and whether this is referring to additionality or stacking, where a piece of land is being used for more than one purpose (for example, carbon capture or nutrient neutrality).
- Reference should also be made to the adherence to the most recent iteration of the Biodiversity Net Gain metric – which is currently 3.1.
- In respect of paragraph 11.11, Biodiversity Net Gain is also not intended to be used for nationally or internationally designated sites.

Response:

The policy requirements are in accordance with the legislative framework. The Biodiversity Net Gain SPD will provide details as to the how the net gain will be required to be delivered, managed and monitored. Paragraph 11.11 makes clear that loss or damage to irreplaceable habitats cannot be offset to achieve net gain.

Additional Modification AM105 clarifies criterion d and what a Biodiversity Gain Plan will be expected to address.

Issue: Policy not necessary as legislation in place:

- BNG already covered by legislation so Policy not needed (768, 1448)
- Secondary legislation not yet in force so Policy would not be enforceable (1222)

Response:

Delivering net gains in biodiversity across the district by the end of the Plan period is an important part of the Vision of this Local Plan and one of its Strategic Objectives. This Policy is considered an important component of the delivery of such an Objective.

Other Issues:

- No development should be allowed to harm biodiversity (539)
- Policy should provide specific protection for turtle doves (1392)
- Policy is ineffectual and undeliverable (408, 539)
- Tilmanstone Colliery Tip should be designated as a Local Nature Reserve (1138)



Response:

Policy SP13 sets out the framework for protection of biodiversity in the plan. NE1 is not designed to provide for specific sites or species, but to ensure that all development adheres to the BNG requirements. Comment on Tilmanstone Colliery Tip noted.

Policy NE2: Landscape Character and the Kent Downs AONB

10 Representations have been received from the following consultees:

290 Kent Downs AONB	1140 Dover and Deal Green Party
545 Sharon Danby	1372 David Powell
566 Northbourne Parish Council	1475 Natural England
695 The Woodland Trust	1665 Alkham Parish Council
1066 Robert Hogben	1706 Walmer Town Council

Support:

Representations 290, 695, 1372 and 1665 find this policy sound.

Issue: Greater protection for the AONB:

- Plan should define what ‘major’ development is (1475, 545)
- Plan should make clear that only limited development is acceptable in the AONB (1475)
- Increased protection for the AONB (1066), not permitting any development in the AONB (1140) , only renovation or rebuilding (545) and only a maximum of 5 dwellings within a mile of its boundary (1140, 1706)

Response:

The level of protection for the AONB offered through NE2 is considered to be sound and accordance with the NPPF and the Countryside and Rights of Way Act. Additional modification proposed to clarify.

Additional Modification AM108 clarifies that development in the AONB should be limited in scale and extent in line with NPPF.

Issue: Inadequate Protection for Landscape Character:

- list of general landscape attributes considered for particular regard should be removed to avoid these taking precedence over potentially more important characteristics and values in a given character area (566)

Response:

Comments noted. Landscape attributes included in this Policy are those that, as the policy wording makes clear, are considered of particular importance in defining the character of an area and to which all development proposals should have particular regard. Landscape characteristics specific to a given Landscape Character Area are clarified in the Landscape Character Assessments.



Issue: Regionally Important Geological Sites

- Supporting text referencing RIGS better located in supporting text to SP13 and reference could be included in Policy (1475)

Response:

Paragraph 11.20 deleted and moved to supporting text to SP13. Policy SP13 wording amended to include reference to RIGS.

Other Issues:

- Greater protection for Ripple LCA F3 (1066), expansion of LCT F Open Arable Chalk Farmland with Woodland – F3 Ripple to include all land west of Kingsdown village in a 3 mile band, to include Ringwould, Ripple, Sutton, Studdal, Little Mongeham to Northbourne and Tilmanstone (1706)
- Update AONB Management Plan dates (290)

Response:

AONB Management Plan details updated. Other comments noted.

Additional modification AM107 updates AONB Management Plan details.

Policy NE3: Thanet Coast and Sandwich Bay SPA Mitigation and Monitoring Strategy

5 Representations have been received from the following consultees:

1141 Dover and Deal Green Party	1637 Sandwich Town Council
1373 David Powell	1707 Walmer Town Council
1478 Natural England	

Support:

Representations 1373, 1637 and 1478 find this policy sound.

Issue: Tariff Levels:

- Support policy but request a higher tariff (1141, 1707)

Response:

The tariff is set out in the SAMM Strategy, which will be reviewed regularly during the lifetime of the Local Plan.

Additional Modification AM109 moves the tariff table out of the Plan and into the SAMM where it will be regularly reviewed.

Policy NE4: Air Quality

3 Representations have been received from the following consultees:

1142 Dover and Deal Green Party	1708 Walmer Town Council
1483 Natural England	



Issue: threats to Air Quality:

- Comment that port-related traffic gridlock as a result of the introduction of biometric passport checks, and the cutting of rural bus services and routes will exacerbate air pollution in the district (1142, 1708).

Response:

Comment Noted.

Issue: Impact of Reduced Air Quality

- Additional reference needed in supporting text to acknowledge to the potential non-human impacts of reduced air quality (i.e. on habitats and species) (1483)

Response:

Reference is made in supporting paragraph 11.36 to this Policy of the potential for air pollution to have an adverse impact on designated environmental sites. Text added to paragraph 11.32 to reference potential harm as a result of air pollution to habitats and species.

Additional Modification AM112 clarifies that improvements in air quality are necessary for both humans and habitats and species.

Policy NE5: Water Supply and Quality

5 Representations have been received from the following consultees:

671 Maxwell MacDowall	1504 Environment Agency
1144 Dover and Deal Green Party	1709 Walmer Town Council
1490 Natural England	

Support:

Representation 1490 finds this Policy sound.

Issue: Water Treatment Package Plans in non-mains drainage areas:

- Factual correction to text of supporting paragraphs 11.48 and 11.51 needed to clarify the approach of the Environment Agency to water treatment package plants in areas of the district which are not on mains drainage (1504)

Response:

Text of 11.48 and 11.51 to be amended for factual correction.

Additional Modifications AM113 and AM114 clarify approach to water treatment package plants in non mains drainage areas.

Issue: Water Efficiency in New Buildings:

- Objection to historic lack of investment in water collection and treatment infrastructure. Plan should require rainwater and grey water harvesting in new homes and enforce adequate water treatment on all new building sites (1144, 1709)



Response:

Enhanced standards of sustainable design and construction, including water efficiency and water harvesting, for all new buildings is addressed by Policy CC2.

Issue: Principle of new development in water stressed areas:

- Objection to building any new homes in the district due to the district being in an area of high water stress, and the increasing likelihood of severe droughts due to climate change (671)

Response:

The Local Plan has been prepared in compliance with the current national planning requirement that Plans include allocations to meet their objectively assessed need for housing in accordance with DLUHC methodology.

Policy NE6: The River Dour

6 Representations have been received from the following consultees:

286 The Dover Society	1635 Sandwich Town Council
1145 Dover and Deal Green Party	1666 Alkham Parish Council
1491 Natural England	1711 Walmer Town Council

Support:

Representations 1145, 1491, 1635 and 1711 find this policy sound.

Issue: Wording should be strengthened:

- In noting the importance of the River Dour to the town of Dover 286 requests that the wording in the policy is strengthened from ‘should’ to ‘must’

Response:

Policy wording clarified to confirm ‘should’ instead of ‘must’ in accordance with the stated objective of this Policy.

Additional Modification AM115 changes should to must in line with the objective wording of this policy.

Issue: Concerns about existing water quality:

- Essential that River Dour is free from pollution and wastewater infiltration which it is not at present (1666)

Response:

The improvement of the quality of the River Dour is the objective of this Policy. Under this Policy all applications for development within the river corridor of the River Dour will have to demonstrate that they will not harm the quality of the water. Paragraph 11.56 explains that applications will have to show how they meet the criteria of Policy NE6 in order to ensure that the natural functioning of this rare chalk stream and its ecosystems are protected and enhanced. However, it should be noted that, while the Local Plan can ensure new development coming forward contributes to these aims, actions against historic pollution incidents cannot be delivered through the planning system.



The Historic Environment

Policy HE1: Designated and Non-designated Heritage Assets

11 Representations have been received from the following consultees:

52 Sue Ward	1196 Historic England
325 The Dover Society	1401 Jeremy Cope
574 Dover Harbour Board	1638 Sandwich Town Council
639 CPRE Kent	1712 Walmer Town Council
1042 KCC	1854 RAMAC Holdings Ltd
1146 Dover and Deal Green Party	

Support:

Representations 574, 1042 and 1196 support this policy.

Representations 1401 and 1638 provide general supportive comments on the need to safeguard heritage assets, to conserve and restore the unique medieval centre of Sandwich and the value of the district's history for promoting tourism. Representation 1854 notes that SAP17 is consistent with this policy.

Issues:

- 52 believes that Whitfield Urban Expansion (SAP1) will harm the setting of listed buildings.
- 325 urges increased use of Article 4 Directions and reference to S215 enforcement notices.
- 639 requested additional wording to require that installation of energy-efficiency improvements do not compromise the appearance of the heritage asset.
- 1042 requests that wording be added to paragraph 12.8 to require Heritage Statements to make reference to Conservation Area Appraisals and, in the case of applications in Dover Town Centre, the Dover Archaeological Characterisation.
- 1146 and 1712 suggest an addendum to this policy to refer to appropriate recording as a means of preserving heritage asset.

Response:

Protection of heritage assets as part of the Whitfield Urban Expansion is required by criteria aa of Policy SAP1. Paragraph 12.22 makes clear that a programme of Article 4 Directions will continue over the Plan period. It is not considered necessary to make specific reference to the use of S215 enforcement notices in the Plan. With regard to the installation of energy efficiency improvements and how such proposals will be determined, it is considered that paragraphs 12.9 and 12.10 together with Policy HE1 provides sufficient advice. The Kent Historic Environment Record already provides an extensive record of heritage assets in the District. Any recording required as a result of development is covered by archaeological watching brief conditions.

Additional Modification AM117 confirms that heritage statements should make reference to CCAs and, where applicable, the Dover Archaeological Characterisation study.



Policy HE2: Conservation Areas

9 Representations have been received from the following consultees:

326 The Dover Society	1197 Historic England
557 Northbourne Parish Council	1429 Jeremy Cope
978 Langdon Parish Council	1556 Shepherdswell-with-Coldred Parish Council
1043 KCC	1713 Walmer Town Council
1148 Dover and Deal Green Party	

Support:

Representations 1043 and 1197 support this policy.

Representation 1429 provides general supportive comments on the need to safeguard heritage assets, and the value of the district's history for promoting tourism.

Issues:

- 326 urges increased use of Article 4 Directions and reference to S215 enforcement notices.
- 557 states that the Policy should also apply to the setting of Conservation Areas.
- 978 notes there is no CAA for East Langdon.
- 1148 and 1713 requests the addition of the word only to the first sentence, so that it reads '[..] will only be supported provided that'.
- 1148 and 1713 suggest that the Policy should also give consideration to efficient heating by adding the following bullet point: "Employ sustainable heating systems, such as ground source heating, and means of reducing energy and water consumption as are compatible with securing the sustainable future of the Area and its setting'.
- 1556 is an objection to SAP51 on the grounds that it is within a Conservation Area.

Response:

Paragraph 12.22 makes clear that a programme of Article 4 Directions will continue over the Plan period. It is not considered necessary to make specific reference to the use of S215 enforcement notices in the Plan. Settings of Conservation Areas are not covered by S72 of the Act. Energy efficiency measures in Conservation Areas are addressed in Policy HE1. Site specific objections are responded to under the relevant Site Allocation Policy.

Policy HE3: Archaeology

7 Representations have been received from the following consultees:

1044 KCC	1374 David Powell
1149 Dover and Deal Green Party	1430 Jeremy Cope
1198 Historic England	1714 Walmer Town Council
1855 RAMAC Holdings Ltd	



Support

Representations 1044, 1198 and 1374 support this Policy. Representation 1430 provides general supportive comments on the need to safeguard heritage assets, and the value of the district’s history for promoting tourism. 1855 notes that SAP17 is consistent with this policy.

Issue: Lydden Valley/ Wantsum Channel:

- 1149 and 1714 seek addition of reference to the need for appropriate archaeological and palaeo-environmental investigation prior to development in the area of the Lydden Valley/Wantsum Channel.

Response:

The Council considers that the wording of HE3 provides sufficient support for the assessment, evaluation and recording of the wide range of designated and non-designated archaeological heritage assets across the district.

Policy HE4: Historic parks and gardens

7 Representations have been received from the following consultees:

54 Sue Ward	1375 David Powell
1045 KCC	1644 Tilmanstone Parish Council
1151 Dover and Deal Green Party	1715 Sandwich Town Council
1199 Historic England	

Support:

Representations 1045, 1151, 1199, 1375, 1644 and 1715 support this Policy.

Issue:

- 54 is concerned with ensuring the preservation of the setting of the historic park and gardens of Waldershare Park.

Response:

The setting of the Registered Park and Garden of Waldershare Park is already covered by this Policy.



Local Plan Appendices

Local Plan Appendix A: Evidence Base

31 Representations have been received from the following consultees:

132, 133 Peter Marriott	1166 National Highways
188 Nicola Clear	1278, 1283 Church Commissioners
308 Sport England (Jo Edwards)	1286 Robert Hogben
424 Kevin Holyer	1332 Mr William Hickson
804 Nonington Parish Council	1391 G Virtue
832 Langdon Parish Council	1470 Mr George Jenkins
951 Beat Hochstrasser	1508 Environment Agency
952 Mr Botwright	1710 Walmer Town Council
957 Dr Sharon Danby	1739 Shepherdswell against Development
1046, 1047 Kent County Council	1745 Club Sandwich
1127, 1130 Mrs Helen Williams	1888 Barratt David Wilson Homes
1128, 1129, 1279 Maurice Webb	1936 Quinn Estates
1139 Dover and Deal Green Party	

Support:

1047 welcomes the inclusion of the Dover Archaeological Characterisation Document.

Housing and Economic Land Availability Assessment (HELAA)

Issues:

- Landowners were not contacted to as part of the HELAA to ensure information was correct. (132)
- HELAA is inaccurate and land has been eliminated from the assessment incorrectly. (Site Specific information on site policies / settlements for omission sites) (133, 424,1391)
- Site remains an allocation despite Appendix 2c Landscape Assessments saying the development of this site would have an impact on the landscape and further assessment is required to demonstrate if this can be mitigated (1127)
- The site specific issues raised against the HELAA assessment been covered under site specific Policies.
- It is unclear why the risk of surface water flooding has been raised on the Site when this was not identified as an issue previously. (1332)
- Despite a positive HELAA rating the site has not been taken forward as an allocation (1470)
- Desktop surveys underestimate negative effects. (1739)
- Previous assessment of land at Northwall Road, Deal appears to have not to have been clearly assessed in the HELAA and is now promoted for employment use. (1936)

Response:

Landowners were contacted regarding availability only outside of the open consultation stages. Landowners were then invited to comment and raise any discrepancies during the regulation 18 and 19 consultation stages.

Further site assessments took place between regulation 18 and 19 which may have resulted in changes to the information within the HELAA. Factual inaccuracies within the HELAA have been addressed in Errata March 2023 where these have been raised.



Not all suitable and available sites have been allocated. More information can be found within this document: <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/helaa-main-report-september-2022.pdf>

Landscape Character Assessment (LCA) and Landscape Sensitivity Assessment (LSA)

Representations on LCA: SDLP1139, Representations on LSA: SDLP1279, Representation that comments on both the LCA and LSA: SDLP957

Issues:

- Request for further sites to be included in the LCA (area inland from Kingsdown, west to Ringwould, Ripple, Sutton, Studdal and Little Mongeham) as Open Arable Chalk Farmland (1139)
- Only 33 sites selected for the LSA. The selection criteria is unexplained. And there has therefore been no site-specific assessment for SAP34 in terms of Landscape Sensitivity. This site is also not included in the LCA (957, 1279)

Response:

Landscape assessments were undertaken for all sites throughout the site assessment / HELAA process by DDC. Where sites within specific areas of the district required additional assessment, these were undertaken as part of the landscape assessments.

Open Space and Play Standards Paper, Playing Pitch Strategy:

Issues:

1. Evidence Base does not justify the current designation of open space which will prevent recommended site improvements where a small loss of open space will enable a larger area of open space to be restored and improved (951)
2. Sports England Strongly recommends that the Playing Pitch strategy is updated (stage E of the PPS assessment method) as the data on which the recommendations are made is becoming out of date (308)

Response:

The Council's latest evidence on playing pitches (PPS) dates from 2019 and is available in the Plan's evidence base, along with an interim internal review undertaken in 2022 as part of the Open Space Topic Paper. Due to the restrictions and change in use/user data due to covid-19, it has not been considered an appropriate time over the past 2 years to formally update the PPS, but it will follow in due course.

Strategic Flood Risk Assessment Level 2:

Issues:

- Inaccurate information, flooding has occurred in this area (GOO006) (188)

Response:

The SFRA identifies the site as at risk of surface water flooding and this has been addressed by the policy.



Transport Modelling:

Issues:

Comments on Transport modelling and specific information within the reports (1046/1047, 1166)

Response:

Transport modelling for the Local Plan has been continuous throughout the preparation of the Local Plan, in agreement with KCC Highways and National Highways. All specific comments made on these documents are being addressed through an updated SoCG of March 2023.

Conservation Area Character Appraisals:

Issue:

A Conservation Area Character Appraisal has not been prepared for East Langdon Green Conservation Area. It would therefore be helpful for relevant neighbourhood plans to be referenced here. (832)

Response:

A programme of Conservation Area Appraisals is being prepared. Given resourcing issues, these will be undertaken in order of priority.

Infrastructure Development Plan and Sustainability Appraisal:

Issue:

- An objection to sections of the SA and IDP as relating to Aylesham and Elvington. Points duplicated onto SA and IDP

Response:

Objections responded to under the SA sections of this document. The IDP will be updated to reflect any comments made in this consultation during 2023.

Water Cycle Study

Issue:

1508 requests that the Water Cycle Study is updated to reflect recent update to the SE River Basin Management Plan and objective of nutrient neutrality approach clarified.

Response:

Noted. Water Cycle Study has been updated for 2023.

Indoor Sports Facility Strategy

Issue:

The planning, design and management of facilities should appropriately and equitably meet the needs of the women in the community. This aspect is not appreciated in Dover Sports and Leisure Facility Study.

Response:

Consultation on the ISFS has closed, however as set out in the Equalities Impact Assessment for the Strategy created as part of the [Cabinet report in July 2022](#), the update is considered to improve access to facilities for many protected characteristic groups, including gender.



Local Plan Appendix B: Local Plan Policies in relation to Neighbourhood Plans:

No Representations received.

Local Plan Appendix C: Local Plan Monitoring Indicators:

1 Representation has been received from the following consultee:

1716 Walmer Town Council	
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Issue:

- Local Plan should require independent evaluation of ecology reports submitted as part of planning applications including objective before-and-after evaluations and baseline measurements and a commitment to robust auditing of conditions requiring tree retention, tree planting and / or biodiversity enhancement.

Response:

This issue will be implemented through the requirements for the delivery of Biodiversity Net Gain, as set out in Policy NE1 and its supporting text.

Local Plan Appendix D: Housing Trajectory:

5 representations have been received from the following consultees:

394 Finns	882, 1005 Northbourne Estate
1019 Danescroft and Pentland Homes	1528 Hume Planning on behalf of Dover District Council

Issue: Housing Supply General

- 882 and 1005 raise concern about over-reliance on extant consents and strategic allocations in early years of plan period. Delays in delivery may lead to a serious shortfall. Smaller sites should be brought forward in the short term. 2 sites are suggested to provide for this.

Response:

The supply of sites provides a continuous sufficient supply across the plan period as set out in the Housing Trajectory, and in the short term, as shown by the five-year housing land supply position. A buffer is provided on the five-year supply as well as the Plan’s housing requirement to account for sites that may not come forward. Short term delivery is from a mix of housing sites and not an over-reliance on strategic sites.

Issue: Housing trajectory site specific comments:

- 395 – states that site WIN003 (SAP42) can be delivered earlier than the trajectory sets out. It should be phased 12 units in 2025 and 2026.
- 1019 – developers Pentland Homes and land promotor Danescroft support the proposed phasing of Whitfield Urban Expansion
- 1528 – SAP28 could come forward 2 years post plan adoption with first units delivered 6-9 months later



Response:

Comments noted and will be taken into account when the trajectory and housing land supply is updated to base date of April 2023.

Local Plan Appendix E: Settlement Hierarchy

12 Representations have been received from the following consultees:

93 Ripple Parish Council	1287 Mark Norcliffe
155 Aylesham Parish Council	1293 Eythorne Parish Council
805 John Garcia-Rodriguez	1558 Shepherdsweil with Coldred Parish Council
970 Maxwell McDowall	1759 Alan and Sarah Gleave
1002 Alkham Parish Council	1931 Quinn Estates Ltd
1285 Robert Hogben	2001 Sharon Danby

In response to all Representations, it should be noted that:

- 1. The basis for the scoring of each settlement in the hierarchy is set out in Chapter 5: Settlement Summaries, of the Rural Settlement Hierarchy Topic Paper, which lists the services and facilities by settlement at the time of survey.**
- 2. All Parish Councils were sent the relevant Settlement Summaries prior to finalising the Rural Settlement Hierarchy Topic Paper and asked to fact check the contents. Summaries were then amended where necessary to incorporate their responses.**
- 3. DDC are aware of the recent cuts to some bus services in the district since the Hierarchy survey work was undertaken. KCC have confirmed that most changes to bus services have been proposed by the private bus companies. (In East Kent, the majority of bus services are provided by the private bus operator, Stagecoach. However, as the Local Transport Authority, KCC maintains overall responsibility for bus infrastructure and provides funding to subsidise some routes which are not viable for private bus operators to run). This is due to a number of factors including significant financial pressures from rising costs, significantly lower passenger numbers since the pandemic (local use of buses is around 80% of pre-pandemic levels with off peak services much less than this) and a shortage of drivers. KCC continues to invest in bus routes and has boosted money available for local community transport schemes. This position is also supported by DDC within the Local Plan through Policy SP12 and the introduction of the Demand Responsive Service recently commenced in Aylesham area, part funded by developer contributions which will be monitored through the plan period. In addition, KCC state that it is working with operators of recently changed routes to try to provide alternative services. DDC will continue to liaise with the Public Transport teams and will reflect any updates within the IDP where this is possible.**

Ripple:

Issues:

- 93 Ripple Parish Council objects to the scoring of Ripple. Specifically,



- Bus service very limited
- Question what the other shop and other community facility are.
- Church should not be included as most services are held in other parts of the diocese.

Response:

The bus service for Ripple is scored as infrequent. The services are listed in the Settlement Summary for Ripple. The current programme of religious services distribution does not affect the fact that Ripple has a church.

Aylesham:

Issues:

- 155 Aylesham Parish Council object to the categorisation of Aylesham. Although Sandwich and Aylesham have equal weighting in the settlement hierarchy, they are not getting an equal weighting in housing development or in terms of investment. (This is supported by representations SDLP1578 and SDLP1579)
- 805 Aylesham, an isolated village with very few facilities, should not be categorised in the same tier as Sandwich.

Response:

Aylesham has been identified as a Rural Service Centre since the Dover Local Plan of 2002. Such a unique strategic role, combined with its scale (it is the largest rural settlement by population in the district) and broad range of existing services and facilities which mean that the village scores highly, places it in this category in the hierarchy. However, as paragraph 3.41 of the Local Plan makes clear the Settlement Hierarchy is only one factor in the housing distribution strategy of the Plan. Site availability, environmental constraints and delivery issues are also determining factors in deciding the spatial distribution of housing allocations and then approach to windfall development.

Kingsdown:

Issues:

- 970, 1759, 2001 Kingsdown should not be designated a local centre. it does not serve other settlements and is confined by the sea and the AONB, is small and has lots of character and a rural setting. The 3 narrow access roads serving Kingsdown do not link up easily to other hamlets and smaller villages to provide services. No doctors, a recently reduced bus service, poor transport links for pedestrians and cyclists, no train station.
- 1285 Kingsdown is isolated by distance and poor public transport and cannot be said to be part of a group of smaller settlements. There are limited opportunities for employment. There is not good access to larger towns. Should be reclassified as a larger village which would mean that the only development permitted would be windfall development.

Response:

Comments noted. The designation of Kingsdown in the settlement hierarchy is on the basis of the services and facilities in the village. These were scored and the score ranked in comparison with those of the other villages in the district.



Alkham:

Issue:

- 1002 Alkham Parish Council requests that Alkham is reclassified as a smaller village. Alkham does not have a frequent or regular bus service, there are no shops, no school, no GP surgery therefore we do not have a good range of facilities which serve our own residents and those of nearby hamlets.

Response:

Alkham is scored as having an irregular bus service, no local shops, a garden centre and a farm shop, no school and no GP surgery.

Shepherdswell:

Issues:

- 1287, 1558 consider that the following errors and inconsistencies are made with regard to Shepherdswell:
- local bus service is described as “infrequent” in para 5.1 of the Rural Settlement Hierarchy Supporting Document but has been upgraded to “regular daily” in the scores table presented in para 5.2. There is also no acknowledgement that some services have recently been withdrawn.
- The “pop-up” Post Office which visits the village briefly on two days per week is accorded the same score as permanent Post Offices in other villages.
- Two points are “awarded” for unspecified services, without further explanation.
- There is no recognition that neither the local pub nor café serve food in the evening
- There is only one public house.

Response:

The Rural Settlement Hierarchy scores local bus services either hourly or regular daily. The service for Shepherdswell is scored as the lower of these two options in the scores table in paragraph 5.2. The part-time post offices in the district, including that at Shepherdswell, are noted in the footnote to the Table. The availability of post office services is scored the same whether the Post Office is full or part time. Services are set out in the Settlement Summaries. The timing of food serving in the pub and the café do not affect the scoring of the presence of such facilities within the village. The Rural Settlement Hierarchy is clear that there is only one public house in the village and the settlement is scored on that basis.

Eythorne and Elvington:

Issues:

- 1293 Eythorne Parish Council objects to the scoring of Eythorne and Elvington. Specifically in Table 2 of the Settlement Hierarchy Topic Paper contains the following errors:
- There is one village hall in Eythorne not two as stated
- Woodpecker Court is not scored
- The café is only open at weekends
- The Post Office is not a separate facility
- The garage for serving and repairs is not scored
- There is no church in Elvington



- There is no barbers in Elvington
- The allotments in Elvington are not mentioned

Response:

The Settlement Hierarchy states that there is only one village hall for Eythorne, scores Woodpecker Court, notes that the PO is not full-time, and does not score a church at Elvington. The barbers in Elvington was added to the Settlement Summary by the Parish Council. The allotments in Elvington are listed in the Settlement Summaries and scored accordingly. The opening hours of the café do not affect its scoring as the service is present and operational in the settlement.

Capel-le-Ferne:

Issue:

- 1931 objects to the downgrading of Capel le Ferne from a local centre to a larger village. Given the range and suitability of the services available to residents in Capel le Ferne, along with its strong connections to employment centres of Dover and Folkestone via public transport, the settlement should be re-designated as a Local Centre.

Response:

The settlement hierarchy has been updated as part of the evidence base for this Local Plan. The position of Capel-le-Ferne in the hierarchy is based on this updated work and a review of the services and facilities present at rural settlements across the district at the time the Regulation 19 Submission Plan was being prepared.

Methodology:

Issues:

- 1287 raises concerns that the village survey data is taken from the Council's Authority Monitoring Report of 2018/2019, which was not up-dated due to Covid restrictions and relies on Parish Council input for any up-dates and corrections. Such an ad-hoc approach to data collection and verification is neither reliable nor sound.
- 1931 the methodology to assess the sustainability of settlements is flawed. Limited consideration is given to the level or value of service facilities provide or any objective and balanced measure of sustainability of settlement based on critical elements such as their characteristics or spatial relationship in relation to other settlements and connections to them. When considering the sustainability of the site, the Council should consider a settlement's respective connectivity to other settlements and the way that settlements inter-relate to support and foster sustainable development.
- 1287, 1293 believe that the hierarchy should be based on absent services and facilities as well as those that are present in a settlement or parish.

Response:

The Hierarchy is based on a long-standing methodology used by many local authorities to provide an overview of the sustainability of rural settlements. It is not possible to survey absences. Due to the restrictions caused by the COVID-19 pandemic, the Hierarchy used a variety of data sources, including AMR survey information and data held by the Council for the Local Land Property Gazetteer, which is collected annually. The was examined and cross-checked against the historic survey data. Consultation was held with Parish Councils to establish the accuracy of this information.



Specifically, tables setting out the facilities that data was indicating was present at each settlement were forwarded to Parish Councils for their input and fact checking in November - December 2021. The results of this exercise were collated in o the Summaries and scores assigned. As the Local Plan makes clear, The Settlement Hierarchy Study is only one of a number of factors that guide the distribution of new development across the district in the new Local Plan.

Local Plan Appendix F: Supporting Documents Required for Planning Applications

2 Representations have been received from the following consultees:

778 The Coal Authority	1717 Walmer Town Council
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Issues:

- A requirement for text relating to a Coal Mining Risk Assessment to be added to Paragraph F.4 (778)
- Add the following to SP13, SP14 and DM policies NE ‘Where permission is given subject to conditions regarding tree retention, tree planting and / or biodiversity enhancement, applicants will need to agree to abide by ‘robust auditing’. Honest objective before and after evaluations.
- A DM policy requiring EIA on all planning applications for developments of over 15 dwellings on greenfield or rewilded brownfield sites is needed

Response:

Comment noted. Requirements for each policy are set out within the policy and implementation detail. Monitoring of conditions and implementation of them is a matter for the planning application stage and enforcement if required. Biodiversity enhancement monitoring will be implemented through the requirements for the delivery of Biodiversity Net Gain, as set out in Policy NE1 and its supporting text.

Requirements for EIA are set nationally.

Additional Modification AM127 adds a Coal Mining Risk Assessment into list of documents.

Local Plan Appendix G: Local Plan Site Allocations

4 representations have been received from the following consultees:

406 Barbara Ridout	462 J Mallion
436 Phillip Welburn	482 Claire Owen

Objections to specific sites:

Response:

These representations were made against Appendix G. However, they make comments about specific sites, and they are therefore responded to against the relevant site policy section above.

PART C: ANNEXES

ANNEX 1: Group Representations

Rep. No	Consultee	Group Name if given	Policy	Number of signatories
SDLP163	Gary John Muirhead	Salisbury Road Residents	SAP40	81
SDLP201	Gerald Irvine	STM10 Residents	SAP40	135
SDLP332	Kingsley Smith		SAP15	10
SDLP856	Terence Hopper		SAP21	265
SDLP868	Richard Parkinson	Sandwich Residents	SAP22	1,037
SDLP1742	Richard Woods	Cox Hill Residents Group	SAP37	23
SDLP1737	John Bulaitis	Shepherdswell Against Development	SAP36	111
SDLP1744	Lyn Davis	Club Sandwich	SAP21	47 (4 Lists)
	Total			1,706

ANNEX 2: Omission Sites

The following representations were received promoting sites that have not been allocated in Local Plan.

SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
1680	Gurdev Moore, Rubix Estates	Land on the south-east side of Alkham Valley Road, Alkham	Housing	Alkham	No – new site
76	Cllr David Beaney	Romany Acres, Ewell Minnis	G&T	Alkham	Yes
1703	AAH Consultants on behalf of Land Allocation Ltd	Land at Saunders Lane, Ash	Housing	Ash	Yes – ASH010



SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
1883	Emily Harris, Savills on behalf of Barratt David Wilson Homes	Land North of Sandwich Road, Ash	Housing	Ash	Yes – ASH006
591	Bidwells on behalf of Emmanuel Collage	Land to the south of Molland Lane	Housing	Ash	Yes – ASH005
1254, 1258	Burnett Planning on behalf of Dean Lewis Estates Ltd	Land north of Aylesham	Housing	Aylesham	Yes – AYL004
1522	Hume Planning on behalf of Kavanagh Motor Services Ltd	Land off Ratling Road, Aylesham	Housing	Aylesham	No
1565	Hume Planning on behalf of Kent County Council	Former youth centre, Ackholt Road, Aylesham	Housing	Aylesham	No
1308, 1333	Iceni Projects on behalf of Quinn Estates	Betteshanger Country Park, Deal	Mixed	Deal	No – new site
1334	Iceni Projects on behalf of Quinn Estates	Betteshanger Country Park, Deal	Tourism	Deal	No – new site
1730	Iceni Projects on behalf of private client	Land north of Betteshanger Country Park	Housing	Deal	Partly within DEA012
1915	Iceni Projects on behalf of Quinn Estates	Land at Cottington, Deal	Housing	Deal	Yes - DEA012
1291	DHA Planning on behalf of Persimmon Homes SE	Land at Golf Road, Deal	Housing	Deal	Yes – DEA004
1324, 1412	Savills on behalf of William Hickson	Land to the east of Northbourne Road, Great Mongeham, Deal	Housing	Deal	Yes – GTM003
1725	EnergyArk Developments Ltd	Land at Coldblow, Deal	Housing	Deal	Yes – DEA009
1568	Hume Planning	Land off West Lea, Deal	Housing	Deal	No – new site
822	PDR Planning Limited	Land at Churchfield Farm, Sholden	Housing	Deal	Yes – SHO001
1587	Hume Planning on behalf of	Land at Station Road, Walmer	Housing	Deal	Existing PP



SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
	Sunningdale House Ltd				
731	Mike O' Brien on behalf of Richborough Estates Limited	Land off Sandwich Road, Sholden (phase 2)	Housing	Deal	
698	Alan David Steggall	DOV001	Housing	Dover	Yes
479	Goldstone Planning on behalf of Mr Virtue	DOV011/TC4S100	Housing	Dover	Yes
1731	Iceni Projects on behalf of Quinn Estates	Land north of Astley Avenue, Dover	Self-build and custom build housing	Dover	Yes – TC4S115
1194	Esquire Developments	Land south of East Langdon Road, East Langdon	Housing	East Langdon	Yes – LAN007
1266	Savills on behalf of Church Commissioners	Land east of Eastry	Housing	Eastry	No – new site
854	Hugh O'Brien	Site at Statenborough House, Eastry	Housing	Eastry	No – new site
1153	Beat Hochstrasser	Site off Mill Lane, Eastry	Housing	Eastry	No – new site
90	Ian Bull Consultancy on behalf of Pentland Homes	Land at Monkton Court Lane, Eythorne	Housing	Eythorne and Elvington	Yes – EYT001
642	John Bishop and Associates on behalf of Canterbury Diocesan Enterprises Ltd	Land to the rear of St Peter and St Paul's Church, Church Hill, Eythorne	Housing	Eythorne and Elvington	Yes – EYT016
1624	Rubix Estates on behalf of Mr Colin and Linda Tearle	Land behind and accessed from Adelaide Road	Housing	Eythorne and Elvington	Yes – EYT002
1740	Iceni Projects on behalf of Quinn Estates	Land at Shooters Hill, Eythorne	Housing	Eythorne and Elvington	Yes – EYT005



SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
423	Kevin Holyer	The Glebe Plot, off Short Street, Chillenden	Housing	Goodnestone	Yes – TC4S067
866, 1055	Strutt and Parker on behalf of Nigel Snape	Land north of Court Wood interchange	Lorry parking	Hougham	No – new site
350	Field Martin Consultants on behalf of Mr Woodward	Land lying to the south east of Eastside Farm, East Langdon	Housing	Langdon	Yes – LAN005
1240	Kent Planning Consultancy	Land at The Street/Broad Street, Finglesham	Housing	Northbourne	Yes – NOR003
1786	Clague Architects on behalf of Kent Salads Ltd	The Former Packhouse, The Drove, Northbourne	Housing	Northbourne	Yes – NOR002
1007	Frazer Halls Associates on behalf of Northbourne Estate	The Former Packhouse, The Drove, Northbourne	Housing	Northbourne	Yes – NOR002
133, 2034	Peter Marriott	Hare and Hounds pub, The Street, Northbourne	Housing	Northbourne	Yes – TC4S072
1460	Hume Planning Consultancy on behalf of Mr Jenkins	Land to the east of The Street, Preston	Housing	Preston	Yes – TC4S099
1743	ADP Architecture on behalf of Mr Sturge	Land to the rear of Meadow Cottage, The Street, Preston	Housing	Preston	Yes – TC4S112
1195	Esquire Developments	Ringwould Nurseries, Ringwould	Mixed	Ringwould	Yes – RIN003
1502	Hume Planning on behalf of Easton Builders	Land at Whitefriars, Sandwich	Housing	Sandwich	Yes – SAN014
531	Finns on behalf of The Roses Beneficiaries Association	Sydney Nursery, Dover Road, Sandwich	Housing	Sandwich	Yes – SAN019
1923	Aspire LPP	Sydney Nursery, Dover Road, Sandwich	Care home	Sandwich	Yes – SAN019
543	Finns on behalf of Mr Binskin	Bellar's Bush Nursery, Dover Road, Sandwich	Housing	Sandwich	Yes – SAN031/TC4S042



SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
1004	DHA Planning on behalf of Catesby Estates	Sandwich Technology School	Education	Sandwich	N/A
493	Finns on behalf of Sunnyside Nurseries	Land at Woodnesborough Road, Sandwich	Housing	Sandwich	Yes – TC4S062/TC4S063
660	John Bishop and Associates on behalf of Canterbury Diocesan Enterprises Ltd	Shepherdswell Glebe	Housing	Shepherdswell	Yes – TC4S107
1698	Country House Homes	Land to the north of Westcourt Lane, Shepherdswell SHE003	Housing	Shepherdswell	Yes – SHE003
830	Hobbs Parker on behalf of TG Designer Homes	Layham Garden Centre, Lower Road, Staple	Housing	Staple	No – new site
1907	Andrew Street	Warren House, Buckland Lane, Staple	Housing	Staple	Yes – STA002
132, 2035	Peter Marriott	Canton, Downs Road, East Studdal	Housing	Sutton	Yes – TC4S038
1721	EnergyArk Developments Ltd on behalf of Ledger Farms	Sites from Guston to Ripple	Housing and sustainable transport node	Various	Yes – TC4S001-TC4S020
945	Foster and Payne	Land adjacent to Sandwich Road, Whitfield	Specialist older persons' housing	Whitfield	Yes – WHI007
844	Plainview Planning	Land to rear of Archers Court Road, Whitfield	Housing	Whitfield	Yes – WHI009
1520	Hume Planning on behalf of Mr Van Petegem	Land off Gobery Hill, Wingham	Housing	Wingham	Yes - WIN006
828	Hobbs Parker on behalf of TG Designer Homes	Land off Gobery Hill, Wingham	Housing	Wingham	Yes – WIN013
1411	Lee Evans Partnership on behalf of Mr and Mrs Tobin	Land off The Street, Woodnesborough	Housing	Woodnesborough	Yes – TC4S090



SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?
1008	Frazer Halls Associates on behalf of Northbourne Estate	Land at Jubilee Road, Worth	Housing	Worth	Yes – WOR004
1960	Lance Austin	Land to the rear of The Street, Worth	Housing	Worth	Yes – WOR001

Open Space/Local Green Spaces

Sites submitted for consideration as Local Green Spaces and/or Open Space.

SDLP Rep No:	Promoter name / Organisation	Site details	Use promoted for	Parish / Area	Site subject to HELAA process?	Site not previously proposed
1517	John Lonsdale on behalf of Walmer Town Council	Betteshanger Country Park, Deal	LGS	Deal	No – new site though already designated OS	
1143	David Hawkes	DEA008	Open Space	Deal	Yes	Site should be removed as a Local Plan housing allocation and designated as Open Space
1675	Northbourne Parish Council	Almonry Meadow, The Drove Northbourne	LGS	Northbourne	No- new site	Promotes land owned by Northbourne PC for designation as LGS

ANNEX 3: Late Representations

SDLP Rep No.	Representor	Date Received	Consultation Point
1993	Cllr Beaney	15/12/2022	SP4
1994	Christine Cooke	09/12/2022	SAP24
1985, 1986, 1987, 1988, 1989, 1991, 1990, 1992, 1499	Natural England **	13/01/2023	SAP1, CC4, Sandwich, NE3, SP1, SP3, SP6, SP13, SP14
1995,1996	Mr and Mrs Stradling	09/12/2023	Aylesham, Local Centres
1997	Stacey Taylor	09/12/2022	Aylesham
1999, 1998	Julie Williams	10/12/2022	Shepherdswell, Eythorne and Elvington

** Late Representations from Natural England have been addressed in accordance with the Duty to Cooperate. A meeting was held to discuss and agree responses to issues raised and the outcomes will be set out in a Statement of Common Ground between the Council and Natural England, see Duty to Cooperate Statement for more information.

ANNEX 4: Sustainability Appraisal Representations

50 representations were made on the Sustainability Appraisal of the Local Plan Submission document, from 42 consultees. These are summarised below, along with the Council's response.

Regulation 19 representations on Submission Dover Local Plan SA Report and Responses

Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA2 (Member of the Public) ⁴		
The Sustainability Assessment for Site STM010 indicates that only two of the eleven identified Objectives are deemed to be a Minor Positive (Housing and Economy). All of the other nine Objectives are deemed to be Minor Negative. As such this beggars the question as to how this site warrants being included in the Regulation 19 version of the Local Plan? In my view this evaluation demonstrates that this site is not suitable for development and should be removed from the Local Plan.	Table 5.4 – St Margaret's at Cliffe residential site STM010 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.65 of the SA Report. 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.
SSA3 (Member of the Public)		
The Sustainability Assessment for Site STM010 indicates that only two of the eleven identified Objectives are deemed to be a Minor Positive (Housing and Economy). All of the other nine Objectives are deemed to be Minor Negative. As such this beggars the question as to how this site warrants being included in the Regulation 19 version of the Local Plan? In my view this evaluation demonstrates that this site is not suitable for development and should be removed from the Local Plan.	Table 5.4 – St Margaret's at Cliffe residential site STM010 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.65 of the SA Report. 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.

⁴ Please note that the missing representation numbers in the sequence result from inadmissible or blank representations.

Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA4 (Member of the Public)		
This table clearly states that Sites STM010 and 011 are unavailable and as such site STM010 should be removed from the Local Plan.	Table 5.4 – St Margaret’s at Cliffe residential site STM010 SA findings	STM010 is available. The availability of sites is not an issue for the SA. Table 5.4 does not address availability.
SSA13 (Member of the Public)		
The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities, sustainable transport, minerals, soils and water, air quality, climate change adaptation, the historic environment and landscape but makes no reference to specific errors in the assumptions used to appraise sites.	Table 5.4 – Shepherdswell with Coldred residential site options SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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.
SSA14 (Member of the Public)		
The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities, sustainable transport, climate change mitigation and adaptation, biodiversity, the historic environment and landscape but makes no reference to specific errors in the assumptions used to appraise sites.	Table 5.4 – Elvington residential site option EYT003 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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.
SSA18 (Member of the Public)		
In my opinion, Sustainability Appraisals SA9, SA10 and SA11 of regulation 19 have not been applied when site STM010 was included in the local plan. Following a meaningful qualitative assessment, it was removed from consideration in 2012. This time, following a meaningless quantitative assessment it was included in the local plan. It, historically, supports	Table 5.4 – St Margaret’s at Cliffe residential site STM010 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.65 of the SA Report. 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

Consultation Comment Summary	SA Report Reference	Response/Action Taken
<p>and vindicates my decision to oppose development on this site and state that the plan is unsound.</p> <p>It was the opinion in 2012 that the land was unsuitable for development because the site is located in a AONB, in a highly prominent and visible location at the top of a hill on a plane and that therefore any development would have a detrimental impact on this designation. Nothing has changed all arguments listed in 2012 still exist today but nevertheless the site which was excluded in the submission document in 2012 miraculously was considered appropriate today.</p>		<p>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>
SSA20 (Member of the Public)		
<p>The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities, sustainable transport, flood risk and landscape but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.4 – Shepherdswell with Coldred residential site SHE006 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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>
SSA21 (Member of the Public)		
<p>It appears that no fully detailed & comprehensive Sustainability Appraisal (SA) specifically relating to this site has been carried out. I except that DDC refer to it with DDC Officer opinion but no evidence, justification or reasoning is given for those opinions.</p> <p>The representation goes on to specifically question judgements in relation to flood risk, traffic congestion, the historic environment, biodiversity, noise pollution and landscape but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.2 – Deal residential site option WAL002 SA findings</p>	<p>Full SA assessment for this site was undertaken and is set out on page 171 of Appendix F. Justification for effects identified for the site option can be found there and should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.2 and paragraphs 5.53-5.55 of the SA Report. 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>
SSA23 (Member of the Public)		
<p>The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities and sustainable transport.</p>	<p>Table 5.4 – Shepherdswell with Coldred residential</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when</p>



Consultation Comment Summary	SA Report Reference	Response/Action Taken
	site SHE006 SA findings	compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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.
SSA24 (Member of the Public)		
<p>The Sustainability Assessment for STM010 is unsound, it is neither effective nor is it consistent with national policy. It also fails to take proper account of the situation of the site within an AONB as required by paragraphs 174-177 of the NPPF.</p> <p>The current Dover Local Plan (2015) for STM010 was, amongst other matters, based on a SAD28 SHLAA assessment. The assessment made for STM010 (as it is now defined) was absolutely clear in its sustainability assessment. The assessment was in the following terms:</p> <p>'Any development on the site would, therefore, have a highly detrimental impact on the designated landscape.' That view is reinforced by all the other conclusions in that suitability assessment – which is set out below and which has only now been disclosed under Freedom of Information.</p> <p>How can it be that in the 10 years from that assessment, the impact of development on the landscape has gone from 'highly detrimental' to 'minor negative effect' as the sustainability assessment for this site (STM010) within SAP40 now concludes?</p> <p>What has happened that has made development of the landscape so less impactful? There is nothing to explain the departure from the current plan - which is a requirement under the national planning policy framework. There is nothing which explains how the sensitivity of the landscape in an Area of Outstanding Natural Beauty has so dramatically lessened in 10 years. Or is simply that the new sustainability assessment is not justified (and therefore unsound) in its new view that the impact of development would be minor?</p> <p>On this basis it is asked that the inclusion of STM010 within SAP40 be deleted as unsound.</p>	Table 5.4 – St Margaret's at Cliffe residential site STM010 SA findings	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.65 of the SA Report.</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 effects of site options on SA objective 11 (Landscape) draw on the Council's HELAA Landscape Sensitivity Assessment. The recording of potential significant effects matches the recording of major, minor and negligible effects in the HELAA assessment.</p>



Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA26 (Member of the Public)		
<p>With regards to the protection of open space, the Council...[have pursued the following policy approach]...only allow the loss of open space either following a robust assessment considering the amenity significance of existing open space and which demonstrates it is surplus to requirements or is replaced with an alternative use or facility which demonstrably provides a net benefit to the community.</p> <p>Our comment concerns the removal of a small area of Open Space of the site "Land Off Mill Lane Eastry" for the purpose of restoring and improving a much larger area of Open Space, resulting in a demonstrable net benefit to the community. The full outline and evidence of this proposition is submitted under Policy PM 5 of the Reg19 Consultation on the DD Local Plan Submission Document.</p> <p>The extremely low score on the sites' quality and value, as assessed in the DDC's Evidence Base, coupled with the fact that the site is and has been covered with building rubble and brambles for at least the last two decades, justifies the removal of a small suitable part of the site from the Open Space designation for the purpose of seeking planning permission for a single dwelling enabling the owners to regenerate the whole site and to restore it to a visually pleasing space, and to take care of the access roads and the protected trees. By further enhancing the biodiversity of the area a greater net benefit to the community will be achieved.</p>	Table 5.4 – Eastry residential site SA findings	Comment noted. This is addressed against the Local Plan as it is not an SA matter.
SSA27 (Member of the Public)		
<p>If the proposed amendment to the Local Plan is approved and subsequent planning application to Dover district Council for a single dwelling is also authorised, provisions will be made to alleviate the current congestion on Mill Lane traffic by providing a car parking space for the adjacent property to the site's East access road, Bushley house. This will result in a further measurable and concrete net benefit to the community.</p>	Table 5.4 – Eastry residential site SA findings.	Comment noted. This is addressed against the Local Plan as it is not an SA matter.

Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA28 (Member of the Public)		
<p>The representation questions the potential to mitigate the recorded significant negative effects of development at site GOO006 on SA objectives 7 (Flood Risk) and 10 (Historic Environment) through the implementation of site allocation and development management policies.</p>	<p>Mitigation of significant effects recorded for site option GOO006 in paragraphs 7.254 and 7.255</p>	<p>In addition to the potential mitigation measures outlined in paragraphs 7.254 and 7.255, Table 7.18 of the SA Report names the other policies in the Dover Local Plan that are likely to help mitigate the significance of the identified significant negative effects against SA objectives 7 and 10.</p> <p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.5 and paragraphs 5.63-5.66 of the SA Report..</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>
SSA29 (Member of the Public)		
<p>The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to resources, biodiversity and landscape. Notable extracts include:</p>	<p>Table 5.4 – St Margaret’s at Cliffe residential site STM010 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report..</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>In Paragraph 7.193 of the SA and again in Table 7.18 (SA5) Site STM010 is recorded as having a Significant Negative effect in relation to Resources. Yet in Table 5.4 this is recorded as a Minor Negative effect.</p>		<p>The effects recorded in paragraph 7.193 and Table 7.18 are a product of the appraisal of Site Allocation Policy 40: St Margaret’s Small Sites, which includes STM006 and STM010. STM006 generates a significant negative effect against SA objective 5 (Resources) in Table 5.4.</p>
<p>In Paragraph 7.205 the SA records site STM010 as having a minor negative effects on wildlife habitats and species. This is incorrectly based on a failure in Appendix F to recognise site STM010 is within 170m of the Dover to Kingsdown SSSI and functions as part of an</p>		<p>The European site is also designated as a SSSI. The assessment of site STM010 acknowledges that the site is within a relevant Special Scientific Interest Impact Risk Zone. The site does not intersect with an ecological designation.</p>

Consultation Comment Summary	SA Report Reference	Response/Action Taken
important wildlife corridor...it should be listed in Paragraph 7.204 as having a Significant Negative effect" because the sites are located within close proximity to European Sites and/or Sites of Special Scientific Interest".		
This evidence directs that site STM010 should be assessed in the September 2022 SA as having a Significant Negative effect on Landscape (SA11)		The effects of site options on SA objective 11 (Landscape) draw on the Council's HELAA Landscape Sensitivity Assessment. The recording of potential significant effects matches the recording of major, minor and negligible effects in the HELAA assessment.
SSA35 (Member of the Public)		
The correction that there is no GP branch surgery in Elvington Community Centre has negatively affected the assessments of land allocations in Elvington. It should also affect the land allocated in Nonington, NON006r because the distance to this branch surgery would have been 2.4km and without it the distance to Aylesham Medical Centre is 3.8km.	SA Report Errata Sheet (October 2022).	The site assessment criteria and assumptions in Appendix C of the SA Report sets out that proximity to known GP surgeries is considered in the appraisal of site options against SA objectives 2 (Services and Facilities), 4 (Transport) and 8 (Climate Change Mitigation). For all three SA objectives, all sites that are greater than 1,200m from a GP surgery get the same rating 'dark red' and are scored a -3 against this criterion. The assessment of NON006r in Appendix F correctly does not acknowledge the close proximity of a GP surgery in relation to SA objectives 2, 4 and 8. Therefore, the effects recorded for site option NON006r stand.
SSA36 (Member of the Public)		
Para 7.548 Says that for NON006 the effects identified throughout this chapter are likely to be particularly acutely felt given the size of potential development relative to the area. This is very true.	SA Report recorded cumulative effects at the settlement level	Comments noted
SSA37 (Member of the Public)		
Sections 2a and 8 of the Site assessment proforma in Appendix F state the site would not cause the loss of any open space, sport, recreation facility, open country and registered common land. There would be loss of the paddock which is 60% of the site and is all open country and open space, used by local residents to walk on, one has permission to burn rubbish, several houses have access via a footpath to the back of their houses.	Table 5.5 – Nonington residential site SA findings. Appendix F NON006r findings.	The paddock does not represent a formal open space, sport, recreation facility recognised by the Council and is not designated nationally as registered common land. Therefore, the statement recorded in relation to criterion 2a is considered to be correct.
Sections 2a, 4 and 8 of the Site assessment proforma in Appendix F state the site is within 1,200m of a primary or middle school: Nonington Church of England Primary School.		Paragraph 2.39 of the SA Report states 'when applying the criteria and assumptions set out in Appendix C to inform the SA of site options, distances were measured from the nearest point of a site to the nearest point of the feature(s) in question.'. The same paragraph acknowledges that this approach may not always accurately reflect the distance to

Consultation Comment Summary	SA Report Reference	Response/Action Taken
Not so, the school is 1.5km away. Should the assessment change to major negative?		features; however, it is considered to be the most accurate and consistent method of assessing all site options many of which have yet to be fully defined, e.g., access to a given site may or may not change as a result of its allocation and permission, or other highway improvements associated with growth in the area.
Further comments relating to the accuracy and relevance of assessment criteria judgements for site option NON006r, specifically in relation to SA objectives 4 (Transport) and 7 (Climate Change Adaptation).		The site options were appraised using the most up to date environmental, social and economic evidence available at the time of assessment. Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C.
SSA40 (Nonington Parish Council)		
The representation asserts that the SA is full of unjustified assumptions, evidence omissions and inconsistencies that, taken together, make the assessment conclusions unsound undermining the soundness of DDC's Reg 19 Local Plan. Specific criticisms of SA assumptions are outlined below:	Table 5.3 – Aylesham residential site AYL003/AYL003r/AYL003r2 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.3 and paragraphs 5.56-5.58 of the SA Report. 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.
LUC incorrectly include Snowdown Colliery as a strategic site inflating site employment sustainability and under-estimating outbound commuting from Aylesham.		The appraisal of AYL003/AYL003r/AYL003r2 only acknowledge the presence of the Aylesham Industrial Estate in appraising SA objectives 2 (Services and Facilities), 4 (Transport) and 8 (Climate Change Mitigation).
SA Section 6.207 states that Eythorne (and Elvington) has 'relatively good access to existing local rail...services'. Eythorne railway station closed to passenger traffic in 1948.		The site appraisals do not acknowledge the presence of Eythorne railway station in the appraisal of site options against SA objectives 4 (Transport) and 8 (Climate Change Mitigation).
The SA site assessment methodology weight sustainability against proximity to transport.		The sustainability of the Publication Local Plan and its reasonable alternatives is comprehensively appraised using the SA frameworks 11 SA objectives, which covers the full range of factors relevant to sustainable development, not just transport.
Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which reduced by 84% from 1,013 onsite jobs in Reg 18 to 267 on site jobs in Reg 19.		LUC cannot find the contradictory employment modelling conclusions in the SA Report.

Consultation Comment Summary	SA Report Reference	Response/Action Taken
The Sustainability Assessment recognizes that Aylesham doesn't have a Secondary School. It doesn't address the lack of capacity at Primary school.		Paragraph B.51 of Appendix B of the SA Report acknowledges capacity issues in the District's primary schools and highlights the need to meet local needs through improvements to existing facilities and infrastructure. This is likely to include expansions and improvements to existing facilities and new facilities. Both apply to everywhere in the District.
The Sustainability Assessment assumes that the presence of the rail travel will increase sustainable travel.		Rail services are only one factor considered in the appraisal of the Publication Local Plan and its reasonable alternatives against SA objective 4 (Transport).
In the SA LUC use ONS - Nomis data, labour market statistics and DataShine ESRC BODMAS (using 2011 ONS Census data) dataset to establish commuter patterns. However, this data set is not available for review.		Footnote 118 in Appendix B of the SA Report directs readers to https://www.nomisweb.co.uk/census/2011/wu01uk/chart .
'Open countryside' is the land outside a settlement boundary. We looked at the Guidance (e.g. Open space, sports and recreation facilities, public rights of way and local green space) but have not found a definition of 'open country' as used in the Sustainability Appraisal Appendix F which concludes this AYL003 'would not cause the loss of any open space, sport, recreation facility, open country and registered common land'.		The Countryside and Rights of Way Act 2000 (CROW Act) normally gives a public right of access to land mapped as 'open country' (mountain, moor, heath and down) or registered common land.
Has the recent withdrawal of bus service between Elvington and Dover been included in revised SA conclusions?		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.
SSA42 (Nonington Parish Council)		
The representation asserts that the SA is full of unjustified assumptions, evidence omissions and inconsistencies that, taken together, make the assessment conclusions unsound undermining the soundness of DDC's Reg 19 Local Plan. Specific criticisms of SA assumptions are outlined below:	Table 5.3 – Aylesham residential site AYL003/AYL003r/AYL003r2 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.3 and paragraphs 5.56-5.58 of the SA Report. 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.
LUC incorrectly include Snowdown Colliery as a strategic site inflating site employment sustainability and under estimating outbound commuting from Aylesham.		The appraisal of AYL003/AYL003r/AYL003r2 only acknowledge the presence of the Aylesham Industrial Estate in appraising SA objectives 2 (Services and Facilities), 4 (Transport) and 8 (Climate Change Mitigation).

Consultation Comment Summary	SA Report Reference	Response/Action Taken
<p>Aylesham's employment modelling conclusions in the 2022 SA are contradictory and misleading. They don't align with the WSP's modelling numbers, which reduced by 84% from 1,013 onsite jobs in Reg 18 to 267 on site jobs in Reg 19.</p>		<p>LUC cannot find the contradictory employment modelling conclusions in the SA Report.</p>
SSA43 (Member of the Public)		
<p>The representation questions judgements in relation to services and facilities and sustainable transport but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.5 – Chillenden residential site GOO006 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.5 and paragraphs 5.63-5.66 of the SA Report.</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>
SSA44 (Member of the Public)		
<p>The representation questions judgements in relation to services and facilities, sustainable transport, biodiversity and landscape but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.2 – Deal residential site WAL002 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.2 and paragraphs 5.53-5.55 of the SA Report.</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>
SSA47 (Member of the Public)		
<p>The revised Local Plan is not sound...It has not been justified and is not effective. It has not been positively prepared to meet 'objectively assessed' needs and for this reason is not consistent with National Policy.</p> <p>Why have the reasonable, sustainable alternatives for additional housing previously suggested in larger development centres such as</p>	<p>Table 5.5 – Capel le Ferne residential site CAP006r SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.5 and paragraphs 5.63-5.66 of the SA Report.</p>

Consultation Comment Summary	SA Report Reference	Response/Action Taken
<p>North Aylesham, Elvington and Eythorne and Farthingloe and included within the original plan have now been removed? At the same time the proposed allowance for housing has been increased in Capel-le-Ferne and will not be deliverable.</p> <p>The original draft Local Plan has been changed so that 900 fewer houses are proposed overall and yet the number of houses proposed in Capel-le-Ferne has increased to 95.</p> <p>The representation goes on to question the compatibility of development in the village of Capel le Ferne with other policies in the local plan and criticise the consultation process used in preparing the Local Plan.</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>
SSA48 (Church Commissioners via Savills)		
<p>Savills questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities, sustainable transport, resources, flood risk and climate change mitigation but makes no reference to specific errors in the assumptions used to appraise sites. Notable points not covered by the response in this row are address below.</p>	<p>Table 5.4 – Shepherdswell with Coldred residential site option SHE006 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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>Paragraph 7.197 states that a minor negative effect is recorded for site SHE006 for SA7 (Flood risk), yet it has been miscolour-coded as a significant negative effect in the main table on page 70 of the Sustainability Appraisal.</p>		<p>The effects recorded in Table 5.4 are a product of the appraisal of site boundaries before consideration of potential mitigation measures outlined in Local Plan policy. The minor negative effect recorded in paragraph 7.197 is for the Site Allocation Policy 37: Shepherdswell Small Sites.</p>
<p>Paragraph 7.203 discusses the impact of allocated sites on objective SA8 (Climate change) and states that site SHE006 is:</p> <p>“likely to have minor positive effects against this objective because the sites are located within sustainable locations with a range of sustainable travel options.”</p> <p>However, in the table on page 70, site SHE006 has been miscolour-coded as having a negligible impact on SA8. It is recommended that the table is updated to accurately reflect site SHE006 as having a minor positive effect.</p>		

Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA49 (Richborough Estates Limited via Pinnacle Planning)		
<p>Richborough of the view that the SA has not correctly assessed the spatial and growth options against SA1. The significant negative effects associated with Spatial Options A and D should be noted accordingly as they would be unlikely to meet the overall housing needs for the District. Given the infrastructure costs associated with urban extensions and based on the specific findings of the Whole Plan Viability Study, Richborough is of the view that the SA is incorrect to assume that larger sites will deliver higher numbers of affordable dwellings.</p>	<p>Chapters 4 – Growth/spatial options SA</p>	<p>Justification for effects identified for the growth/spatial options can be found in Chapter 4.</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>It is considered reasonable to assume that larger sites have access to an economy of scale not possible in small sites.</p> <p>Read in full, paragraph 4.68 in the SA Report reads as follows: ‘It is expected that the provision of housing at larger sites, most likely through urban extensions in the case of Dover District, will provide most opportunities for the delivery of higher numbers of affordable dwellings. All spatial options would allow for a level of development at the larger settlements which could support at least one new urban extension. Therefore, there is potential to secure new affordable homes through all options.’</p>
<p>Richborough is therefore of the view that the results of the SA assessment should clearly highlight Spatial Option C as the strongest performing option.</p>		<p>Paragraphs 4.114 to 4.116 clear highlight Spatial Options C and D as the best performing growth and spatial options.</p>
SSA50 (Member of the Public)		
<p>The Sustainability Appraisal Appendix contains – in more than one place – the assertion that site SAP36 is within 500 metres of the local railway station. It is not. GPS data clearly shows that it is almost one kilometre from the site to the station utilising the most direct road and footpaths.</p>	<p>Table 5.4 – Shepherdswell with Coldred residential site SHE004r2 SA findings</p>	<p>Paragraph 2.39 of the SA Report states ‘when applying the criteria and assumptions set out in Appendix C to inform the SA of site options, distances were measured from the nearest point of a site to the nearest point of the feature(s) in question.’. The same paragraph acknowledges that this approach may not always accurately reflect the distance to features; however, it is considered to be the most accurate and consistent method of assessing all site options many of which have yet to be fully defined, e.g., access to a given site may or may not change as a result of its allocation and permission, or other highway improvements associated with growth in the area.</p>
SSA51 (Eythorne Parish Council)		
<p>The representation questions judgements in relation to a range of topics of relevance to the SA, including proximity to services and facilities,</p>	<p>Table 5.4 – Elvington residential site</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-</p>

Consultation Comment Summary	SA Report Reference	Response/Action Taken
sustainable transport and resources but makes no reference to specific errors in the assumptions used to appraise sites.	options EYT003 and EYT008 SA findings	5.62 of the SA Report. 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.
SSA58 (Member of the Public via Savills)		
<p>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. Table 4.2 of the representation sets out the proposed changes to the SA findings as suggested by Savills and following the production of further technical work. This was set out in the previous findings by Savills in the Reg. 18 documents.</p> <p>The SA findings are generally considered not to be justified as there are multiple ways to ensure or mitigate the adverse effects, which are suggested are not accounted for in the SA.</p>	Table 5.5 – Great Mongeham residential site GTM003 SA findings	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.5 and paragraphs 5.63-5.66 of the SA Report.</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>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 7.3 of the SA Report. Accompanying justification for the effects identified are set out in paragraphs 7.60 to 7.111.</p> <p>Table 7.18 of the SA Report summarises the negative effects that could arise from the implementation of the individual Publication Local Plan policies in relation to each SA objective and how these are likely to be mitigated by other policies in the Publication Local Plan.</p>
SSA59 (Member of the Public)		
The representation questions judgements in relation to health and wellbeing, air pollution and employment but makes no reference to specific errors in the assumptions used to appraise sites.	Table 5.2 – Deal residential site WAL002 SA findings	Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.2 and paragraphs 5.53-5.55 of the SA Report. 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.

Consultation Comment Summary	SA Report Reference	Response/Action Taken
SSA60 (Shepherdswell with Coldred Parish Council)		
<p>The representation questions judgements in relation to the historic environment and landscape but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.4 – Shepherdswell with Coldred residential site SHE004r2 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.4 and paragraphs 5.59-5.62 of the SA Report. 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>
SSA61 (Member of the Public)		
<p>The representation questions judgements in relation to agricultural land, services and facilities, transport, climate change mitigation and recreation but makes no reference to specific errors in the assumptions used to appraise sites.</p>	<p>Table 5.2 – Deal residential site WAL002 SA findings</p>	<p>Justification for effects identified for the site option can be found in Appendix F, which should be read in conjunction with the site assessment criteria and assumptions set out in Appendix C. Consideration of the relative performance of the residential site option when compared to other reasonable alternatives can be found in Table 5.2 and paragraphs 5.53-5.55 of the SA Report. 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>

ANNEX 5: Habitat Regulations Representations

15 comments, from 15 consultees were made on the Habitats Regulation Assessment. These are summarised in the table below, along with the Council's response and actions taken.



Consultation Comment Summary	Response / Action Taken
SHRA1 (Member of the Public)	
<p>The Habitat Assessment was carried out by DDC assessing sites primarily against the criteria for internationally recognized and protected sites such as RAMSARS and SAC's. The law is such, that DDC can do this. This means that sites protected by national law only, have been disregarded and are represented poorly or not at all in this assessment. I believe that this approach does not do justice to our national policies, fails to protect all that we cherish and fails to meet the criteria displayed in DDC's "vision themes and strategic objectives", Table 7.1 and detailed further in Strategic Policies 13 & 14. As the result, I, as a simple sailor, have written and responded to a wider, and I hope, more accurate criteria that is inclusive of all.</p> <p>I, Gerald Warren Irvine, allege that the screening assessment of STM010 was inappropriately carried out. As the direct consequence of this inappropriate assessment of this site, the further assessment of STM010 was totally inappropriate and seriously flawed. The grounds are as follows –</p> <p>112 Table 4.7 in the screening assessment shows Dover to Kingsdown Cliffs SAC as "NO" LSE. This is to development which DDC has determined will cause no physical damage or loss and no physical disturbance. The particular site in question is the highest, most prominent point on the White Cliff ridgeline at the north east end of the Bay as its old name "Snag Burrow" informs us. It can be viewed from all directions as the existing developments in all directions are some metres below the ridge-line. The only screening at present is a single row of secondary growth sycamore trees lining edges of the field along The Droveaway and Salisbury Road verges. The field, in photographs, circa WWII and after, is shown to be chalk grassland devoid of any other vegetation. When the National Trust bought the farm in 1947 this field was chalk grassland. When Natural England was formed and the cliff greater area designated AONB, including this field STM010, it was for specific objectives, to preserve and conserve the area of which STM010 forms an integral part. The settlement boundaries were also specifically drawn to protect the AONB. Mechanized arable farming on this site came later.</p> <p>The site STM010 in this assessment is listed in relation to the nearest RAMSAR and SPA sites which are near Sandwich and Thanet. These are 7 to 14 miles away from this site. The nearest SSSI site and as such, European site is much, much nearer, 250 metres away near the cliff edge along with the other designations under 4. below. Why has this Site been compared with others so distant when there exist the most highly protected sites much closer? I ask you to refer to my earlier personal submission under Regulation 19 Consultation SDLP7 for further details.</p> <p>In the table "Appropriate Assessment, LUC42, site STM010 is not assessed. It is notable by its absence from assessment in any recognized form. The interactive map does not show it as an SAC but DDC assessed sites STM 003/006/007 and 008 as such. Site STM010 was not accorded the same recognition and assessed similarly. Again, I refer you to submission SDLP7, above.</p> <p>Site STM010 is assessed jointly along with STM006 under SAP40. Site STM006 has AONB status and lies in an inland valley screened by other housing from public view. It directly accesses a highway with pavements. Site STM010 is somewhat different. It has not only AONB status but Heritage Coast and Bio-diversity recognition. Other sites in this AONB were treated as if they had SAC status in the evidence submitted by DDC. It meets the Coastal Management Area which in turn flows into the Maritime</p>	<p>The HRA of the Dover District Regulation 19 Local Plan has appropriately considered all relevant European sites, including SAC, SPA and Ramsar sites. All other designated sites, including SSSIs and AONBs, are not subject to protection under the Habitats Regulation and as such have not been considered in this assessment.</p> <p>Dover to Kingsdown SAC</p> <p>No likely significant effect is predicted in relation to physical damage and loss as no development is proposed within the boundaries of the SAC and the SAC does not support qualifying species that are reliant on off-site functionally linked land.</p> <p>No likely significant effect is predicted in relation to non-physical disturbance as this SAC does not support qualifying species, which are susceptible to impacts from noise, vibrations or light.</p> <p>In addition, detailed consideration was given to the impacts of recreational pressure in relation to Dover to Kingsdown SAC as detailed in para 5.99-5.102, and which outlined that mitigation measures would be required to address the cumulative impacts of increased recreation on the SAC as a result of the Local Plan to ensure that a sufficient level of certainty in concluding that the Local Plan will not result in adverse effects on the integrity of the SAC. Mitigation included:</p> <ul style="list-style-type: none"> ■ Access management and monitoring. The SAC is predominantly managed by the National Trust who have committed to an extensive programme of on-site visitor management and mitigation measures. The Council have provided commitment in the Local Plan through Policy SP13: Protecting the Districts Hierarchy of Designated Environmental Sites and Biodiversity Assets to work closely with the National Trust to deliver onsite visitor



Consultation Comment Summary	Response / Action Taken
<p>Conservation Zone. It was specifically included in the 2002 Saved Policies Local Plan. It may, or it may not, be accessed publicly from one, no exit, ancient highway by vehicles. Yet DDC have assessed it alongside and with STM006. It deserves and must be given its own appropriate assessment. Regulation 105 requires this consideration in combination. DDC, by their methodology and other means have denied it.</p> <p>Pages 759-762 lays out DDC's methodology and assessment of Site STM010 against set criteria. Most of these criteria I will respond to under "Sustainability". However, amongst some of the errors contained within regarding Habitat, I will address here. Objective 9 Biodiversity.</p> <p>"The site is not within 250m of a designated site". This is incorrect. The site "itself" is a designated site. Natural England allot the designations.</p> <p>"The site does not intersect with notable ecological habitats." This is contradicted by their own description above "The site interests with a relevant Site of Special Scientific Interest Impact Risk Zone."</p> <p>Inaccuracies, or errors, litter this assessment.</p> <p>Under 11: Landscape we have the assessment that the site has the potential to moderately affect the Districts landscapes, townscapes or seascapes. Yet, somehow, the magic formula rates the outcome as minor negative, (uncertain). How can any impact rated as moderate, become minor negative and then be determined as uncertain? This assessment shows no absolutes, no certainty, nothing to firmly base a 15 year plan on.</p> <p>Appendix B Table on page B-19 identifies the key vulnerabilities and the conservation objectives and what these habitats rely on including natural vegetation and habitat connectivity. The necessary action described in this table is "Active and ongoing conservation management to protect, maintain and restore these habitats." This is repeatedly stated by DDC throughout this Local Plan. The Local Plan, Regulation 19, as produced by DDC, is in total opposition to 5.102 and Policy 5.133 which has not been followed. The new Local Plan, now seeks to overturn this status for site STM010 and if passed, will result in a redrawing of the settlement boundaries in the presumption of development.</p> <p>The Screening Matrix, Appendix C, LUC C/5 highlights in orange background, the likely effects of certain activities. The outcome of all these activities is shown as "UNCERTAIN." The question must be asked. If at the end of all consultation with every consultee, the result is, at the very best an uncertain outcome for the likely activities, should we be entertaining any development, whatsoever? "Positive preparedness and justified actions" are not to be found here. It is plain, as stated in SDLP7, that all outcomes are not uncertain. All direct outcomes on this field are very detrimental to possibly, disastrous and total.</p> <p>Following a site visit on the 4th. February, 2009, the inspector, Mr Clive Tokeley, issued his decision, ref APP/X2220/A/08/2084552, on the 24th. February, 2009, in respect of planned developments on "Franconia" a plot laying adjacent to, and 5 metres below, the level of the field to the south west. His decision was of three pages, two of which lay out in great detail, the particular attributes and features of the field that require protection. In brief –</p> <p>Main</p> <p>"The main issues are the effect of the proposal on the character and appearance of the street scene and the effect on the adjacent countryside that lies within the North Downs Area of Outstanding Natural Beauty (AONB) and is designated Heritage Coast and Special Landscape Area (SLA)."</p>	<p>management and mitigation measures over the plan period.</p> <ul style="list-style-type: none"> ■ Provision of updated monitoring surveys once every five years to monitor impacts of recreation and to ensure that mitigation measures remain effective. ■ Provision of alternative natural green space and green infrastructure. Although, it is recognised that this is less applicable as a mitigation measure for this SAC and that the primary on access management and monitoring. <p>Policies within the Local Plan will also provide safeguards and mitigation from recreational impacts.</p> <p>Site Allocation STM010</p> <p>In relation to Policy SAP40, which includes the site allocation STM010, the assessment identified that this policy has potential to result in a likely significant effect and as such has been highlighted in the Screening matrix in Appendix C as uncertain. Following a more detailed assessment and consideration of mitigation measures at the Appropriate Assessment, it was concluded that no adverse effects on integrity would arise from proposed development in the Local Plan and as such no uncertainty remains in relation to any of the policies in the plan, including Policy SAP40.</p> <p>It is noted that STM010 in error was not included in the assessment Table 5.3 in Chapter 5. Following consultation with Natural England on the HRA of the Regulation 19 Local Plan, it has been advised that a buffer of 5km from the SPA and Ramsar site should be applied in relation to impacts to loss of functionally linked land. As such, it can be concluded that STM010 is located over 5km from the SPA and Ramsar and as such no likely significant effect will occur in relation to loss of functionally linked land.</p> <p>It is noted that that in error the European sites potentially affected by impacts arising from the Local Plan and which were identified in the Screening Assessment and subsequently considered further at Appropriate Assessment were not provided in full in the</p>



Consultation Comment Summary	Response / Action Taken
<p>This inspector's decision, and an earlier inspector's decision on STM011, reinforce a number of DDC's decisions, all on public record, regarding developments about, or actually on the site, Snag Burrow, comprising STM010 and STM011. The two houses that were eventually built on Franconia were, as the direct result, very much diminished in height. Now DDC, through the Local Plan, intends to overturn all previous rational reasoning and legal protections on this field, and the law, to permit development.</p> <p>I ask for the above reasons that the inspector remove site STM 010 from the Regulation 19 plan and reinforce its protections. I also ask that the inspector scrutinize other selected windfall sites, in the villages, in this local plan for similar discrepancies and irregularities.</p>	<p>Screening matrix in Appendix C. It should be noted that this does not alter the conclusions of no adverse effect on integrity as detailed in Chapter 5.</p>
<p>SHRA2, SHRA8, SHRA11, SHRA12 (Member of the Public)</p>	
<p>Four respondents to the consultation of the Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document raised concern with the impact of additional traffic from proposed development from the Local Plan resulting in impacts to access and safety. Two respondents identified this to be a concern at St Margaret's at Cliffe, one respondent raise concern at Eythorne and Elvington and one respondent raised this as a concern at Kingstown.</p> <p>The respondent who raised concern at Kingtown, also more broadly identified concerns with increases in the local population will result in a negative impact in this area of the district.</p> <p>Reference should be made to the full responses provided for each consultation response.</p>	<p>These comments are not relevant to the HRA and as such have not been considered further.</p>
<p>SHRA4 (Member of the Public)</p>	
<p>This respondent has raised concern in relation to proposed development associated with policy SAP24 – Land to the South of Aylesham (AYL003) and DM Policy 39 Landscape Character Proposals. The respondent outlines that no study work has been undertaken in relation the loss of food production, carbon and nitrogen capture of crops and flooding. The respondent is concerned that the importance and role of farmland, farming employment and the importance of food production in the Dover district has not been considered.</p> <p>Reference should be made to the full response provided for this consultation response.</p>	<p>This comment is not relevant to the HRA and has not been considered further.</p>
<p>SHRA5, SHRA13 (Member of the Public)</p>	
<p>Two respondents to the consultation of the Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document raised concern with the impact of proposed site allocations to biodiversity in the borough. Specifically, these respondents were concerned with the impact of development at specific locations, including Deal and Kingsdown Cliffs, to other designated sites (SINC) and habitats and species, including those which are not designated as qualifying features of European sites within the district (+15km buffer). Both respondents provided specific examples of known species in the area.</p> <p>Reference should be made to the full responses provided for each consultation response.</p>	<p>The HRA has appropriately considered the impacts of proposed development in the Local Plan in relation to European sites (SAC, SPA and Ramsar sites) and their qualifying species.</p> <p>Impacts to other designated sites and non-qualifying habitats and species are not relevant to the scope of this HRA.</p>
<p>SHRA6 (Member of the Public)</p>	



Consultation Comment Summary	Response / Action Taken
<p>This respondent provided commentary on the Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document in relation to proposed development at Elvington, specifically in relation to EYT003 and physical damage and loss of functionally linked land for golden plover. The respondent has made reference that this site allocation is one of the six sites considered to have potential to support golden plover and has highlighted the potential impacts that development would result in, which were identified as part of the Screening Assessment.</p> <p>Reference should be made to the full response provided for this consultation response.</p>	<p>The HRA considered the impacts of proposed development in the Local Plan in relation to physical damage and loss of offsite habitat used by qualifying bird species of the Thanet Coast and Sandwich Bay SPA and Ramsar site.</p> <p>The Screening Assessment identified that there was potential for likely significant effects to occur as a result of proposed development at site allocation EYT003 in relation to physical damage and loss of offsite habitat used by qualifying bird species of the SPA and Ramsar site.</p> <p>This site allocation was considered further at the Appropriate Assessment, which identified EYT003 to have high potential to provide suitable habitat to support golden plover, a qualifying bird species of the SPA. As recommended in the HRA, a suite of mitigation measures have been incorporated into the Local Plan and provided these are implemented successfully, it can be concluded that there will be no adverse effect will arise from physical damage and loss to the SPA and Ramsar site.</p>
SHRA9 (Member of the Public)	
<p>This respondent has raised a formal objection to proposals for development at site allocation WAL002. They have stated that the inclusion of this site is not compliant with or compatible with the principles of the Local Plan and that this site allocation should be removed from the plan.</p> <p>The respondent has raised specific objections in relation to the following:</p> <p>Greenfield site and potential to flood – this refers primarily to issues relating to the Sustainability Assessment.</p> <p>Access and road traffic – the respondent has outlined that this site allocation was previously reject from the previous plan in 2010 due to restricted vehicular and pedestrian access and flooding. The respondent is concerned that no changes have been made to the proposal other than the reduction of proposed housing numbers. The respondent has made reference to KIN008 and its reasons for not being suitable and that the majority of these reasons also apply to WAL002. The respondent is concerned with the impacts that development will have on congestion and safety.</p> <p>Heritage</p> <p>Wildlife habitat – the respondent has outlined that WAL002 is functionally linked land to Hawkshill Freedown SPA and SNCI and supports many species, including birds and butterflies.</p>	<p>The HRA has appropriately considered the impacts of proposed development at WAL002 in relation to European sites and has concluded that there will be no adverse effect on the integrity of any European sites identified within the assessment.</p> <p>The HRA Screening Assessment identified proposed development at site allocation WAL002 to have potential to result in a likely significant effect on qualifying bird species of Thanet Coast and Sandwich Bay SPA and Ramsar site in relation to physical damage and loss of offsite habitat.</p> <p>The site allocation was considered further at the Appropriate Assessment, which identified that WAL002 to have moderate potential to provide suitable habitat to support golden plover, a qualifying bird species of the SPA. As recommended in the HRA, a suite of mitigation measures have been incorporated into the Local Plan and provided these are implemented successfully, it can be concluded that there will be no</p>



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<p>Noise – the respondent is concerned with the impact to the Hawkshill Freedown and that no noise assessment has been undertaken.</p> <p>Landscape and character of the settlement</p> <p>The respondent refers to previous Regulation 18 objections and outlines alternative sites that should be considered.</p> <p>Reference should be made to the full response provided for this consultation response.</p>	<p>adverse effect will arise from physical damage and loss to the SPA and Ramsar site.</p>
SHRA10 (Member of the Public)	
<p>This respondent has raised concern with the Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document in relation to water supply. The respondent is concerned that there is not a sufficient water supply at present and that this would be further exacerbated by additional development proposed within the Local Plan. The respondent has stated that <i>"building developments should be put on hold in this district until water companies can invest and build the required infrastructure to adequately overcome any doubts on continuous supply in drought conditions."</i></p> <p>Reference should be made to the full response provided for this consultation response.</p>	<p>The HRA has appropriately considered the impacts of proposed development in relation to water quantity and has concluded that no adverse effect on integrity will arise.</p> <p>These conclusions have been supported by the findings of the Dover District Water Cycle Study (2023), which confirmed that both Southern Water and Affinity Water's Water Resources Management Plans are robust and appropriately account for how they will accommodate for future growth in each respective catchment area whilst considering environmental conditions. This evidence base has also informed specific policies in the Local Plan.</p> <p>The conclusions of the HRA are supported by Natural England in the latest consultation.</p>
SHRA16 (Savills on behalf of client)	
<p>This respondent provided a detailed response to Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document in relation to GTM003: Land East of Northbourne Road. The representation provided detail on the site and surrounding context, illustrative proposals, comments on the evidence base, representations on the Draft Local Plan and conclusion. The respondent outlines their support for the allocation of this site as a non-strategic housing allocation, however they have raised that there is scope to increase the housing provision across the site and improve its contribution to the requisite growth in the District. Supporting evidence of this increase in proposed housing growth at this site has been appended to the main report.</p> <p>Reference should be made to the full response provided for this consultation response.</p>	<p>This comment is not relevant to the HRA and has not been considered further.</p>
SHRA18 (Members of the Public)	
<p>The respondent raised concern that the Regulation 19 - Habitats Regulation Assessment on the Dover District Local Plan Submission Document is unsound. In particular, the respondent highlights that Policy</p>	<p>The HRA considered the impacts of proposed development in the Local Plan in relation to physical damage and loss of offsite habitat used by qualifying</p>



Consultation Comment Summary	Response / Action Taken
<p>SAP36: Land to the north and east of St Andrews Gardens and adjacent to Mill House (SHE004/ TC4S082) is unsound and not legally compliant for reasons including:</p> <ul style="list-style-type: none"> ■ <i>The Habitats Regulations Assessment flags the site as Red – High – as a suitable habitat for migrating birds. The report claims that these losses can be mitigated. But the report is underestimating the extent of the damage the proposed site would do to the district’s wildlife and species. The NPPF (para 182) states that ‘presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site’ unless ‘an appropriate assessment’ has been carried out. There is no evidence that anything other than a desk-bound assessment has been undertaken. Residents have viewed Golden Orioles visiting the Site during migration. Raptors, such as Sparrow Hawks, are seen hunting over the Site, which is a testament to the amount of wildlife the Site provides, including insects and small mammals.</i> ■ <i>Three residents living adjacent to the site have identified the following amongst the wildlife using the site as a habitat.</i> <ul style="list-style-type: none"> – <i>Bats (a growing population, which nest in properties adjacent to the site)</i> – <i>Stoats</i> – <i>Badgers (a set exists in undergrowth adjacent to Saint Andrews Gardens)</i> – <i>Foxes</i> – <i>Slow worms (utilising disused rabbit/vole burrows around the perimeter of the site) (See photo)</i> – <i>Newts and toads</i> – <i>Owls</i> – <i>Spotted woodpeckers</i> – <i>Green woodpeckers</i> – <i>Pheasants (visiting)</i> – <i>Hérons</i> – <i>Male and female bullfinches and goldfinches</i> – <i>Variety of tits, including long-tailed</i> – <i>Song thrushes</i> – <i>Wrens</i> – <i>Jays</i> – <i>Flora is varied – the summer months boasting a display of wild flowers.</i> 	<p>bird species of the Thanet Coast and Sandwich Bay SPA and Ramsar site quantity and has concluded that no adverse effect on integrity will arise.</p> <p>Following consultation with Natural England on the HRA of the Regulation 19 Local Plan submission, they have advised that the application of a 10km buffer would be appropriate and as such the HRA will be updated to reflect this latest guidance. Due to the distance of SHE004 and TC4S082 proposed under Policy SAP36, which are located over 5km from the SPA and Ramsar site, impacts resulting from loss of offsite habitat for qualifying species of the SPA and Ramsar site are considered to be negligible. Therefore, it can be concluded that no adverse effect on integrity will arise from proposed development at these proposed development locations.</p> <p>Habitats Regulations Assessment assesses the impacts of proposed development in the Local Plan on qualifying features of European sites scoped into this assessment. Therefore, a number of the species listed by the respondent are not subject to protection under the Habitats Regulation and/or are not qualifying features of the Sites requiring consideration in the HRA and as such have not been considered in this assessment.</p>



Consultation Comment Summary	Response / Action Taken
<p>■ <i>Two other residents living adjacent to the site write: 'The land is used by wildlife, especially birds (I feed them year round, and regularly get 20-40 'red-listed' Starlings and up to 15 House Sparrows to my bird tables each day.) There is a variety of birds that use this land, including Collared Doves, Blue Tits, Blackbirds, Crows, Jackdaws, Rooks - all traditional farmland birds. Starlings alone have decreased by 66% since the mid 70s. By depriving them of this open meadow land, rich in the earthworms and insects on which they heavily depend, we would be driving increasingly frequent extinction events. The loss of this meadow land and its wildlife would be a blow to the people of the village. There have been widely publicised reports that access to and interaction with the countryside and wildlife contributes to mental health. I know that looking out of my window each morning and seeing all the birds lifts my heart.'</i></p> <p>The respondent has outlined that changes to remove of this site allocation will ensure that the plan is sound and legally compliant. They have also requested to take part in the oral section of the examination to allow for their points and evidence to be presented to the Inspector.</p> <p>Reference should be made to the full response provided for this consultation response.</p>	