



## Dover District Local Plan

**Planning and Development  
Council Offices  
White Cliffs Business Park  
Dover  
Kent CT16 3PJ  
Website: <https://www.dover.gov.uk>**

The Planning Inspectorate  
Plans Team  
Temple Quay House  
2 The Square  
Temple Quay  
Bristol  
BS1 6PM

Contact: Ashley Taylor, Planning  
Policy  
Direct line: 01304 872244  
E-mail: [Ashley.taylor@dover.gov.uk](mailto:Ashley.taylor@dover.gov.uk);  
[localplan@dover.gov.uk](mailto:localplan@dover.gov.uk)  
Date: 31<sup>st</sup> March 2023

By email to [plans.admin@planninginspectorate.gov.uk](mailto:plans.admin@planninginspectorate.gov.uk) and  
[matthew.giles@planninginspectorate.gov.uk](mailto:matthew.giles@planninginspectorate.gov.uk)

Dear Sir/Madam

**PLANNING AND COMPULSORY PURCHASE ACT 2004  
TOWN AND COUNTRY PLANNING REGULATIONS (LOCAL PLANNING) (ENGLAND)  
REGULATIONS 2012  
SUBMISSION OF THE DOVER DISTRICT LOCAL PLAN 2040 FOR EXAMINATION**

In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), I have the pleasure of submitting to you the Dover District Local Plan 2040 for examination and the supporting documents, as required by Regulation 22.

The list in Annex 1 sets out the documents included. The documents will be transferred to you via Sharepoint. The documents will also be published on the [examination website](#) by 3<sup>rd</sup> April 2022.

Representations made pursuant to Regulation 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012 are summarised in Consultation Statement Part 2 Appendix F (SD05d), along with the Council's response. A summary of the main issues is also included therein and provided at Annex 2 to this letter. A schedule of representations is provided (SD04a) and copies of the representations in representation number order (SD04). Representations will also be viewable in Plan order through the Council's [consultation portal](#) by 3<sup>rd</sup> April 2022.

One of the documents submitted is a Schedule of Additional Modifications to the Regulation 19 Submission Plan (SD06). The modifications listed have not been subject to consultation as the Council considers that they are of a minor nature. They include updated data or matters of clarification, and other editorial changes, a number of which address representations from statutory consultees received under Regulation 20. The Council requests that, if the Inspector appointed to undertake the examination of the Plan comes to the view that one or more the changes constitute 'main modifications', they should consider them as part of the examination. This would be under the provisions set out in paragraph 1.6 of the 'Procedure Guide for Local Plan Examinations' February 2023.

The Council also requests, under the terms of Section 20(7C) of the Planning and Compulsory Purchase Act 2004, that the appointed Inspector recommends any modifications of the Plan that they consider would be needed to make the Plan legally compliant and sound. Please can this letter be treated as the formal request which is required under the legislation.

The Council is not requesting to have its Five Year Housing Land Supply confirmed through the examination.

Of the supporting documents submitted, the following updated and additional documents to those produced for the Regulation 19 stage are provided. None of the updates alter the policies or substance of the Plan: These documents are all clearly re-titled as March 2023 documents.

- Duty to Co-operate Statement Update (GEB01); Statement of Common Ground with Canterbury City Council Update (GEB03); Statement of Common Ground with National Highways and Kent County Council Highways and Transportation (GEB06) and Draft Statement of Common Ground with SBC, CCC, NH and KCC (GEB07) – to reflect the process of continuous engagement prior to submission of the Plan.
- Habitats Regulations Assessment (SD09) – to reflect ongoing discussions with Natural England.
- Sustainability Appraisal Addendum and Erratum (SD03c) – to reflect changes in the Habitats Regulations Assessment and correct administrative errors in 2 site assessments.
- Housing Topic Paper (HEB02) – to assist the examination process.
- Indoor Sports Facilities Strategy (PMEB02) – Final version following consultation.
- Additional Junction Modelling (TIEB03) and Technical Note – Station Road/Dover Road Junction, Walmer (TIEB04) - to reflect ongoing discussions with Kent County Council Highways and Transportation.
- HELAA Erratum – to correct factual errors identified through Regulation 20 representations.

Updated versions of the following documents are currently being prepared and will be submitted by the following dates to assist the examination process:

- Site Selection Topic Paper (to be provided by the end of April 2023).
- Infrastructure Delivery Plan and Schedule (to be provided by the end of June 2023).
- Employment Topic Paper (to be provided by the end of June 2023).

The Regulation 19 versions of the documents are still available on the Local Plan website: [Regulation 19 Evidence base](#).

In addition, the Council is continuing to work with other parties on Statements of Common Ground and these will be provided as examination documents once finalised.

With regards to arrangements for the examination hearing sessions. These will take place at the Council Offices, White Cliffs Business Park, Dover, Kent, CT16 3PJ. There is provision to hold hearing sessions in person, online or in a hybrid format.

On the basis that the Local Plan contains both strategic and non-strategic policies, the matters within the Plan, and that 225 representors have stated they wish to participate in the oral part of the examination, the Council estimates the duration of the hearing sessions part of the examination process to last approximately three weeks. The Council suggest a preferred timescale for the opening of the hearing sessions to be from September 2023.

The Council has appointed an independent Programme Officer for the examination, whose contact details are:

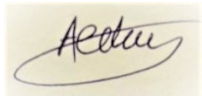
Louise St John Howe, Programme Officer, PO Services

Phone: 07789-486419

Email: [louise@poservices.co.uk](mailto:louise@poservices.co.uk)

If you have any queries in relation to the above, please do not hesitate to contact me, and I look forward to hearing from you regarding arrangements for the examination.

Yours sincerely,

A handwritten signature in black ink on a light-colored background. The signature is cursive and appears to read 'Ashley Taylor'.

Ashley Taylor

Planning Policy and Projects Manager

Annex 1 – List of Submission Documents

Annex 2 – Summary of main issues (extract from SD05d)

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
<b>Core Submission Documents (SD)</b>		
SD01	<a href="#">Dover District Local Plan to 2040 - Regulation 19 Submission Document</a>	October 2022
SD02	<a href="#">Dover District Local Plan to 2040 - Policies Map (weblink)</a>	October 2022
SD03	<b>Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)</b>	
SD03a	<a href="#">Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) Main Report (including Appendices A-E)</a>	September 2022
SD03b	<a href="#">Sustainability Appraisal (SA) Appendix F Site Assessments</a>	September 2022
SD03c	<a href="#">Sustainability Appraisal (SA) Addendum and Erratum</a>	March 2023
SD04	<b>Representations received under Regulation 20 to Dover District Local Plan Regulation 19 Submission</b>	
SD04a	<a href="#">Schedule of representations received under Regulation 20 to Dover District Local Plan Regulation 19 Submission</a>	March 2023
SD04b	Representations pursuant to Regulation 20 in Representation Number Order (SDLP3 to 500)	March 2023
SD04c	Representations pursuant to Regulation 20 in Representation Number Order (SDLP501 to 1000)	March 2023
SD04d	Representations pursuant to Regulation 20 in Representation Number Order (SDLP1001 to 1500)	March 2023
SD04e	Representations pursuant to Regulation 20 in Representation Number Order (SDLP1501 to 2000)	March 2023
SD04f	Representations pursuant to Regulation 20 in Representation Number Order (SDLP2001 to 2043)	March 2023
SD05	<b>Regulation 22 Consultation Statement</b>	
SD05a	Regulation 22 Consultation Statement Part 1 Regulation 18 (including Appendix A-D)	October 2022
SD05b	<a href="#">Regulation 22 Consultation Statement Part 1 Regulation 18 Appendix E</a>	October 2022
SD05c	Regulation 22 Consultation Statement Part 2 Regulation 19 (including Appendix A - E)	March 2023
SD05d	Regulation 22 Consultation Statement Part 2 Regulation 19 Appendix F	March 2023
SD06	<a href="#">Schedule of Additional Modifications to the Regulation 19 Submission Plan</a>	March 2023
SD07	<b>Dover District Local Plan 2040 Submission Notice</b>	March 2023
SD08	<b>Dover District Council Local Plan Submission Letter</b>	March 2023
SD09	<a href="#">Habitats Regulations Assessment</a>	March 2023
SD10	<a href="#">Local Development Scheme</a>	September 2022
SD11	<a href="#">Statement of Community Involvement</a>	2019
<b>General Evidence Base (GEB)</b>		
GEB01	<b>Duty to Cooperate Statement Update March 2023</b>	March 2023

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
<b>GEB02</b>	<b>East Kent MoU Update</b>	2021
<b>GEB03</b>	<b>Statement of Common Ground with Canterbury City Council Update</b>	<b>March 2023</b>
<b>GEB04</b>	<b>Statement of Common Ground with Folkestone and Hythe District Council</b>	October 2022
GEB05	<b>Statement of Common Ground with Thanet District Council</b>	April 2022
<b>GEB06</b>	<b>Statement of Common Ground with National Highways and Kent County Council Highways and Transportation</b>	March 2023
<b>GEB07</b>	<b>Draft Statement of Common Ground - SBC, CCC, NH and KCC H&amp;T</b>	
<b>GEB08</b>	<b>Whole Plan Viability Study</b>	
GEB08a	Whole Plan Viability Study Main Report and Appendices	November 2020
GEB08b	Viability Study Update Note	August 2022
<b>GEB09</b>	<b>Housing and Employment Land Availability Assessment (HELAA)</b>	
<b>GEB09a</b>	HELAA Main Report	October 2022
<b>GEB09b</b>	HELAA Appendix 1a – c: HELAA 2022 site assessments	October 2022
<b>GEB09c</b>	HELAA Appendix 2a – g: Targeted Call for Sites site assessments	October 2022
<b>GEB09d</b>	HELAA Appendix 3a – g: HELAA 2020 site assessments	October 2022
<b>GEB09e</b>	HELAA Appendix 4 – HELAA Duplicate Sites	October 2022
<b>GEB09f</b>	HELAA Erratum Note March 2023	March 2023
<b>GEB10</b>	<b>Minerals Assessment of Regulation 19 Sites</b>	May 2022
<b>GEB11</b>	<b>Landscape Sensitivity Assessment</b>	January 2021
<b>GEB12</b>	<b>Equality Impact Assessment (2022)</b>	2020
<b>Topic Based Evidence Base (EB) &amp; Background Documents (BD)</b>		
<b>Housing Evidence Base (HEB) and Housing Background Documents (HBD)</b>		
<b>HEB01</b>	<b>Strategic Housing Market Assessment (SHMA)</b>	
HEB01a	Strategic Housing Market Assessment Part 1	February 2017
HEB01b	Strategic Housing Market Assessment Part 2	February 2017
HEB01c	Strategic Housing Market Assessment Partial Update	December 2019
HEB01d	Modelling the Demand for First Homes	November 2021
<b>HEB02</b>	<b>Housing Topic Paper</b>	March 2023

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
HEB03	<b>Settlement Hierarchy and Confines Topic Paper</b>	August 2022
HEB04	<b>Gypsy, Traveller and Travelling Showpersons Accommodation Assessment</b>	September 2018
HEB05	<b>Gypsy and Traveller Site Options Assessments</b>	
HEB05a	Gypsy and Traveller Site Options (Review)	January 2020
HEB05b	Gypsy and Traveller Potential Sites Assessment Version 2	March 2020
<b>Climate Change Evidence Base (CCEB) and Climate Change Background Documents (CCBD)</b>		
CCEB01	<b>Strategic Flood Risk Assessment (SFRA)</b>	
CCEB01a	Strategic Flood Risk Assessment Original	March 2019
CCEB01b	Strategic Flood Risk Assessment Addendum	December 2021
CCEB01c	Strategic Flood Risk Assessment Level 2	December 2021
CCEB02	<b>Sequential Approach to Site Selection</b>	May 2022
CCEB03	<b>Water Cycle Study Update</b>	March 2023
CCEB04	<b>Site Specific Guidance for Managing Flood Risk</b>	March 2019
CCEB05	<b>Review of Coastal Change Management Areas</b>	June 2018
CCEB06	<b>Dover Mid Town Flood Modelling</b>	December 2020
CCEB07	<b>Climate Change Topic Paper</b>	October 2022
CCBD01	<b>Dover District Council Climate Change Strategy</b>	January 2021
<b>Placemaking Evidence Base (PMEB)</b>		
PMEB01	<b>Open Space and Sport Topic Paper</b>	September 2022
PMEB02	<b>Indoor Sports Facilities Strategy (ISFS)</b>	November 2022
PMEB03	<b>Open Space Assessment</b>	
PMEB03a	Open Space Assessment Main Report	December 2019
PMEB03b	Open Space and Play Standards Paper	December 2019
PMEB04	<b>Playing Pitch Strategy (PPS)</b>	
PMEB04a	Playing Pitch Strategy Assessment Report	February 2019
PMEB04b	Playing Pitch Strategy and Action Plan	August 2019

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
<b>PMEB05</b>	<b>Dover Local Football Facilities Plan (weblink)</b>	July 2020
<b>Employment and Town Centres Evidence Base (EEB) and Employment and Town Centres Background Documents (EBD)</b>		
EEB01	<b>Economic Development Needs Assessment (EDNA)</b>	November 2021
EEB02	<b>Economic Growth Strategy</b>	November 2021
EEB03	<b>Tourism Topic Paper</b>	December 2020
<b>EEB04</b>	<b>Retail and Town Centre Needs Assessment (RTCNA)</b>	
EEB04a	RTCNA Update Volume 1 - Retail and Leisure Needs Assessment	October 2021
EEB04b	RTCNA Update Volume 2 - Town Centre Shopping Patterns and Health Checks	October 2021
EEB04c	RTCNA Update Volume 3 - Policy and Strategy Recommendations	October 2021
EEB04d	RTCNA Update Volume 4 - Appendices on Quantitative Outputs	October 2021
EEB04e	Retail and Town Centre Needs Assessment	July 2018
EBD01	<b>Tourism and Visitor Economy Strategy 2020</b>	
<b>Transport and Infrastructure Evidence Base (TIED) and Transport and Infrastructure Background Documents (TIBD)</b>		
<b>TIEB01</b>	<b>Infrastructure Delivery Plan (IDP)</b>	
TIEB01a	Infrastructure Delivery Plan Draft for Consultation	October 2022
TIEB01b	Infrastructure Delivery Plan Appendix 1 and 2 (Including Infrastructure Delivery Schedule)	October 2022
<b>TIEB02</b>	<b>Regulation 19 Transport Modelling Forecasting</b>	
<b>TIEB02a</b>	Regulation 19 Transport Modelling Forecasting - Main Report	October 2022
<b>TIEB02b</b>	Regulation 19 Transport Modelling Forecasting - Appendices	October 2022
<b>TIEB02c</b>	Regulation 19 Transport Modelling Forecasting Erratum	March 2023
<b>TIEB03</b>	<b>Additional Junction Modelling</b>	March 2023
<b>TIEB04</b>	<b>Technical Note - Station Road/Dover Road Junction, Walmer</b>	March 2023
TIEB05	<b>Regulation 18 Transport Model Forecasting Report</b>	January 2021
<b>TIEB06</b>	<b>Dover and Deal Transport Model Specification Report</b>	May 2018
<b>TIEB07</b>	<b>North Deal Study Data Collection Report</b>	February 2018

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
TIEB08	<b>Sustans Walking and Cycling Audits</b>	
<b>TIEB08a</b>	Three Towns Route	September 2020
<b>TIEB08b</b>	Dover Town Walking and Cycling Audit	September 2020
<b>TIEB08c</b>	Deal Town Walking and Cycling Audit	September 2020
<b>TIEB08d</b>	Sandwich Town Walking and Cycling Audit	September 2020
<b>TIEB08e</b>	Aylesham Walking and Cycling Audit	September 2020
<b>TIBD01</b>	<b>Kent Design Guide Review - Residential Parking</b>	2008
<b>TIBD02</b>	<b>Kent Vehicle Parking Standards</b>	2006
<b>Natural Environment Evidence Base (NEEB) and Natural Environment Background Document (NEBD)</b>		
NEEB01	<b>Dover Green and Blue Infrastructure Strategy Evidence Report</b>	May 2022
NEEB02	<b>Draft Green Infrastructure Strategy</b>	March 2023
NEEB03	<b>River Stour Connectivity Study</b>	September 2022
NEEB04	<b>Thanet Coast and Sandwich Bay SPA Strategic Access Mitigation and Monitoring (SAMM)</b>	
NEEB04a	Thanet Coast and Sandwich Bay SPA SAMM Strategy	March 2023
NEEB04b	Thanet Coast and Sandwich Bay SPA SAMM Evidence Report	September 2022
NEEB05	<b>Lydden Temple Ewell SAC and Dover to Kingsdown Cliffs SAC Visitor surveys</b>	October 2021
NEEB06	<b>Air Quality Study</b>	January 2021
NEEB07	<b>Dover District Landscape Character Assessment (LCA)</b>	October 2020
NEBD01	<b>Biodiversity Opportunity Area (BOA) Statements</b>	
NEBD01a	Biodiversity Opportunity Area Statement - Dover and Folkestone Cliffs and Downs	n/a
NEBD01b	Biodiversity Opportunity Area Statement - East Kent Woodlands and Downs	n/a
NEBD01c	Biodiversity Opportunity Area Statement - Lower Stour Wetlands	n/a
<b>Historic Environment Evidence Base (HEEB) and Historic Environment Background Documents (HEBD)</b>		
HEEB01	<b>Revised Heritage Strategy</b>	June 2020
HEEB02	<b>Dover Archaeological Characterisation</b>	January 2021



Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
HEEB03	<b>Historic Environment Topic Paper</b>	December 2020
HEBD01	<b>Western Heights Masterplan Supplementary Planning Document</b>	September 2015
HEBD02	<b>Western Heights Combined Heritage and Landscape Appraisal</b>	
HEBD02a	Western Heights Combined Heritage and Landscape Appraisal Volume 1 Report	March 2017
HEBD02b	Western Heights Combined Heritage and Landscape Appraisal Volume 2 - Figures	March 2017
HEBD02c	Western Heights Combined Heritage and Landscape Appraisal Volume 3 - Vegetation Action Plans	March 2017
HEBD02d	Western Heights Combined Heritage and Landscape Appraisal Volume 4 - Historic OS Maps	March 2017
HEEBD03	<b>Deal South Barracks Conservation Area Appraisal</b>	February 2018
HEBD04	<b>Nelson Street Conservation Area Appraisal</b>	January 2017
HEBD05	<b>Dover Town Centre Conservation Area Appraisal</b>	April 2002
HEBD06	<b>St Margaret's Bay Conservation Area Appraisal</b>	November 2022
HEBD07	<b>Upper Deal Conservation Area Appraisal</b>	December 2019
HEBD08	<b>Victoria Road Wellington Road Conservation Area Appraisal</b>	December 2019
HEBD09	<b>Waterloo Crescent Conservation Area Appraisal</b>	May 2017
HEBD10	<b>Kingsdown Conservation Area Appraisal</b>	October 2015
HEBD11	<b>Guidance on Shopfronts and Signage within Conservation Areas 2012</b>	May 2012
<b>General Background Documents (GBD)</b>		
<b>GBD01</b>	<b>Authority Monitoring Reports (AMR)</b>	
GDB01a	AMR 2021/22	March 2023
GBD01b	AMR 2020/21	January 2022
<b>GBD02</b>	<b>Five Year Housing Land Supply Position 2022-2027</b>	September 2022
<b>GBD03</b>	<b>Adopted Neighbourhood Plans</b>	
GBD03a	Ash Neighbourhood Plan	September 2021
GBD03b	Worth Neighbourhood Plan	September 2014
<b>GBD04</b>	<b>Dover District Council Corporate Plan</b>	<b>2020</b>

Annex 1 to Dover District Local Plan Submission Letter  
Submission Documents List

Document reference	Document Name	Date
GBD05	Whitfield Urban Expansion Masterplan Supplementary Planning Document	April 2011

## 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 9<sup>th</sup> 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. 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).