

| HELAA Long List Reference | Location   | Post Code | Settlement     | Parish             | Ward           | Summary of Comment/Information Submitted at Regulation 18   | KCC Highways comments   | Environment Agency comments - Flood Risk | Environment Agency comments - | KCC SUDS comments | AONB Unit comments summary   |
|---------------------------|--|-----------|----------------|--------------------|----------------|---|---|--|-------------------------------|-------------------|--|
| ALK003                    | Land at Short Lane, Alkham   | CT15 7BZ  | Alkham         | Alkham             | River          | Transport and Minerals Assessments provided in support of proposed allocation   | No additional comment to make. Comments as per previous HELAA submission  |  |                               |                   | Maintain no objection to this allocation.  |
| AYL003                    | Land to the south of Spinney Lane, Aylesham                                      | CT3 & CT4 | Aylesham       | Aylesham           | Aylesham       | Ackholt House included in AYL003 boundary<br>Viability Review, Movement Plan and Capacity Study submitted in support of proposed allocation. Also proposed an alternative location for the G&T site which has been fed into the TC45  | Pre-application discussions are taking place with the site promotor, however there are still outstanding highway matters that have yet to be resolved. As alluded to within the additional material submitted by the site promotor, there has yet to be any engagement with Highways England in relation to potential impact on the A2 corridor and associated junctions. It would not be appropriate to defer this as a policy requirement as any mitigation to the HE network needs to be identified at this stage to ensure that a deliverable solution is achievable. Whilst a potential mitigation measure has been identified for Spinney Lane, this has yet to be fully concluded at this stage, however we are confident that with some additional land take within the land promoters control, that an appropriate form of mitigation can be achieved. We have yet to receive acceptable mitigation proposals for A257/High Street (Wingham) or Adisham Holt Street. Geometrical constraints at both of these junctions has led to a need for more detailed design work, which the applicant is currently in the process of considering and responding to. It is essential to reach an agreed position on these junctions at Local Plan making stage, it would not be acceptable to defer the requirement to conclude these studies through specific site policy, as we need to have sufficient confidence that a solution is achievable. No specific discussions have taken place with Local Bus Operators to date, however we are aware that a new "Demand Responsive" public transport model is currently being trialled using contributions from the Aylesham Village Expansion and therefore it may be possible for this development to contribute towards extending. It is suggested that a need to improve public transport accessibility including local bus services is included as a specific site based policy. |  |                               |                   |  |
| AYL005                    | Land off Holt Street, Snowdown, Aylesham   | CT15 4JN  | Aylesham       | Aylesham/Nonington | Aylesham       | The representation provides additional information on the proposed use of the site in addition to an indicative masterplan. The proposed scheme comprises:<br>- Site clearance and ground preparation works, including the removal of vegetation and hardstanding in the parts of the site proposed for development and treatment of mine workings, where required.<br>- Construction of up to 40 carbon-neutral, community-based affordable housing units on the land north of Holt Street to create a small residential extension to the hamlet of Snowdown.<br>- Alteration, repair and refurbishment of existing buildings and construction of new buildings to provide up to 12,000 sqm gross floorspace, comprising a mix of A1 (shops and retail outlets), A3 (food and drink), A4 (drinking establishments), B1 (business), B2 (general industrial use), B8 (special industrial group F) and D1 (non-residential institutions) uses within the footprint of the previously developed part of the site to the immediate south of Holt Street (the Bee Yard). The new and restored buildings will not exceed the height of the current tallest building, No 3 Engine House, which is three storeys in height.<br>- Creation of a natural open space in the main body of the site to the south of the derelict colliery buildings, containing an events space (up to 1,000 sqm), park lodges for holiday accommodation (up to 4,000 sqm) and bee hives, as well as nature trails, public art and picnic areas.<br>- Landscaping including tree planting and habitat creation and enhancement with retention of existing semimature woodland on the boundaries where possible.<br>- Provision of new vehicle and pedestrian accesses. | **Unclear as to whether this is being considered in tandem with other proposals included within the site promoters reps. For the purpose of this assessment this is being considered on the basis of residential on the north side of Holt Street** Vehicle access to the site appears to be achievable within the site frontage onto Holt Street, however the location of the access may need to deviate from that shown within the indicative masterplan. Whilst this site is located in close proximity to Snowden Station, there is concern over pedestrian access and the scope of increased activity over the rail bridge which currently has no pedestrian facilities, therefore an appropriate solution to this would need to be explored. There whilst 40 dwellings is unlikely to generate a severe traffic impact on the surrounding highway network, it is important for the cumulative impact from all prospective local plan sites to be considered on more constrained rural routes in the locality. Access to scheduled bus services is very poor, however it may be possible for a Demand responsive solution to be explored as part of the wider Local Plan strategy.   |  |                               |                   |  |
| CAP006                    | Land to the east of Great Cauldham Farm, Capel-le-Ferne                          | CT18 7LZ  | Capel le Ferne | Capel le Ferne     | Capel le Ferne | Queries downgrading of Capel in Settlement Hierarchy. Argues site could sustainably accommodate 100 dwellings. Incl Transport Note, Landscape Briefing Note, Archaeology Note<br>Query re finding SA and highway access to Capel sites  | Emergency access point is still shown to Cauldham Lane, however it is doubtful that emergency vehicles would be able to negotiate the lane and no swept path analysis is provided to demonstrate that it could effectively function as such. Notwithstanding this, if the allocation is remaining at 50 dwellings then a secondary access will not be required anyway, but for 100 dwellings the views of Kent Fire and Rescue should be sought. Swept path and visibility checks at the proposed site junction should be undertaken at this stage to provide confidence that the site is deliverable. The supporting literature suggests that the junction of Capel Street/New Dover Road will be able to accommodate the additional traffic demand from the development sites, however the Cauldham Lane/Capel Street Junction and the Capel Street/Dover Road junctions appear to have been assessed as individual junctions, whereas in reality there is likely to be some interactivity between traffic at these junctions, which could have a bearing on operation of this part of the local road network. It is suggested that peak hour queue length surveys are undertaken (or if already done - provided) in this location to corroborate the outputs of models and if significant discrepancies are identified within the baseline models, further assessment may be required. The proposed improvements to Dover Road are noted and whilst these have not been supported by a RSA1, they are adequate for this level of assessment. A policy requirement for improvements to the Capel Street/Dover Road junction should be included if DDC be minded to retain this allocation.  |  |                               |                   | Support changes made to policy wording re site design, landscape buffer, trees and vehicular access  |
| CAP009                    | Longships, Cauldham Lane, Capel-le-Ferne   | CT18 7HG  | Capel le Ferne | Capel le Ferne     | Capel le Ferne |   |   |  |                               |                   | No objection   |
| CAP011                    | Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne | CT18 7JD  | Capel-le-Ferne | Capel le Ferne     | Capel le Ferne |   |   |  |                               |                   | Concerns maintained about the site failing to be complementary to the traditional street pattern, but support the reduction of dwelling numbers and amended policy criteria which will help mitigate impacts |
| CAP013                    | Land at Cauldham Lane, Capel-le-Ferne  | CT18 7HG  | Capel-le-Ferne | Capel le Ferne     | Capel le Ferne | Access and footway connection plan  | Additional plan that has been submitted for consideration does not adequately clarify whether the required footway links are achievable within highway land or land that the promotor has control over. There are no definitive highway boundary plans or land ownership plan shown. The footway link shown uses land within prospective allocation CAP009 and it has not been confirmed if there is an agreement or arrangement between the two site promoters (or if they are the same promotor).   |  |                               |                   | Support changes to policy wording re site design and retention and enhancement of existing trees and hedgerows.  |

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| DEA008  | Land off Cross Road, Deal                                      | CT14 9LA | Deal  | Deal                  | Mill Hill                 | Preliminary Highways Review   | Direct (off carriageway) pedestrian links from this to this site to Walmer Station are not achievable without using footways included as part of the recently approved site on the opposing side of Cross Road. Therefore suitable restrictions on the delivery of this site will need to be imposed, or interim pedestrian improvements will need to be delivered. It is accepted that the consented development now forms part of the baseline and that any additional impacts from Local Plan sites are typically measured against that baseline, however given known local traffic constraints in the area, it would now be prudent for additional assessment to be undertaken at the Station Road/Dover Road junction, (including any other Local Plan growth impacts) to ascertain if further mitigation is required to accommodate this site and others. Our previous comments in relation to improvements being required at junction of Cross Road with St Richards Road to provide uncontrolled pedestrian crossing point still stand. This hasn't been addressed within the note, but should be included as a policy requirement.  |   |   |  |  |
| DEA012  | Land between the A256 and North Deal                           | CT14 0AQ | Deal  | Sholden/Deal          | Middle Deal & Sholden     | <p>A revised scheme has been submitted for DEA012 as part of the Regulation 18 consultation on the draft Local Plan. The new scheme, named Cottington Park, covers a reduced site area to the previous scheme considered and proposes:</p> <ul style="list-style-type: none"> <li>- 975 new dwellings of which 30% will be affordable housing units <ul style="list-style-type: none"> <li>- Self build housing</li> <li>- 2FE primary school</li> <li>- Cycle ways and pedestrian routes</li> </ul> </li> <li>- New public open space covering approx 400 acres</li> <li>- A new facility for the Dover Outreach Centre <ul style="list-style-type: none"> <li>- Links to Deal Town Centre</li> <li>- Low carbon development</li> <li>- Local convenience services</li> <li>- Job creation</li> <li>- Business space for SMEs</li> </ul> </li> <li>- Sports facilities - the development will enable the re-location of Deal and Betteshanger Rugby Club to the site and enhance facilities at Deal Town Football Club</li> <li>- Sustainable transport connections incorporating electric buses and bikes</li> <li>- A fully independent drainage network</li> </ul> <p>Information provided to support the representation includes:</p> <ul style="list-style-type: none"> <li>- Flood risk mapping</li> <li>- Vision document</li> <li>- Phase 1 Land Contamination Assessment</li> <li>- Landscape and Visual Appraisal</li> <li>- Ecological Constraints Assessment</li> <li>- Archaeological Assessment</li> <li>- Arboriculture Technical Note</li> <li>- Drainage Scoping Assessment</li> <li>- Transport Appraisal</li> <li>- Site Plans</li> <li>- Utility Searches</li> </ul>   | There are some theoretical network benefits in moving existing school access away from the main road as school traffic activity can impact on the free flow of peak hour traffic, however this would be difficult to define quantitatively what these benefits might be. Provision of a 'Sustainable Movement Corridor' is the sort of initiative that will be required in order to realise a significant amount of additional growth within the Sholden/Deal/Walmer Areas, and broadly concurs with aims and objectives of the NPPF and national transport planning guidance and strategies. However in order for this to be successful in practice, a detailed appraisal of the proposed route and achieving sufficient journey time reliability and service frequency will be necessary. At the moment it is doubtful that a meaningful improvement (in journey time terms) can be achieved, however it may be possible that with some additional analysis on the impact on the A258 corridor that further clarity could be provided. There is potential to intercept some of the existing car barn that travel into and out of Deal, however this will only be achieved if use public transport provides a cost/time benefit over use of the private car. At the moment, the submitted evidence does not provide a compelling case to suggest that significant model shift will be achieved as bus services are likely to be impacted by existing traffic pressure in and around Middle Deal. Whilst some initial outputs have been produced at a strategic level which infers that impacts from the development could be negligible, we would challenge this and suggest that V/C calculations alone are not sufficient to consider potential impact at a junction by junction level. It is noted that the VISUM outputs appear to suggest that at a link level the majority of the Deal network will not exceed theoretical capacity, but it is important to highlight that these calculations are relatively strategic in nature and the saturation flow levels on these links could be impacted by local features such as on street parking, crossing facilities and blocking back from individual junctions. Therefore outputs from Visum need to be treated with a relevant amount of interpretation and additional assessment undertaken where necessary. Whilst this note makes a reasonable start at assessing overall development impact, it is concluded that it has not demonstrated that the impact from the development could be appropriately mitigated. More detailed link/junction analysis will be needed at a local level in order to assess absolute impact. The Do-minimum model also does not take into account any other planned allocations within the district which would also need to be considered on a cumulative basis in any evidence base. Therefore the residual impacts could be quite different once this is accounted for. | We have no objection to the principle of development here providing all development is kept outside FZ3 in FZ1. We note in the technical assessment that some development is proposed in areas that are at residual risk (the risk that remains should defences be breached or overtopped) and that therefore lie in FZ3 (the undefended floodplain). We would highly recommend FZ3 is kept free of development altogether. If the LPA is minded to allocate within FZ3 then it will need to demonstrate that the Sequential Test has been undertaken and that there are no reasonably available sites in a lower risk area that could provide suitable development. The proposal will then be subject to a site specific FRA which will need to identify the design flood level on site (including the latest climate change allowances) and all living accommodation will need to be set above this level with appropriate freeboard. The FRA will also need to demonstrate that the proposal does not alter flow paths in any way which could worsen flood conditions to neighbouring land. The Lead Local Flood Authority should also confirm they are content that surface water can be managed safely, prior to allocation. | Biodiversity – All developments must adhere to the, soon to be, compulsory Biodiversity Net Gain of a minimum of 10% increase. All works will require ecological surveys and Ecological Impact Assessments (EIA) to assess any potential impact on ecology. Should protected species be found to be on site, mitigation and/or compensation methods will need to be in place prior to the commencement of works. Invasive Non-Native Species (INNS) surveys will also need to be conducted and any found on site must be treated to prevent their spread. Sufficient systems must be in place to ensure that run-off and discharge does not negatively affect the aquatic and riparian environments. When developing next to Main River, a minimum of an eight metre buffer zone must be in place to maintain and enhance the river corridor. | Kent County Council as Lead Local Flood Authority would provide the following comments:<br>a)The concern is that space for surface water management needs to be incorporated within the developable areas outside of areas of any flood risk. We would seek clarification of the potential impact of tidal flood risk on any area of surface water management.<br>b)Discharge rates from the attenuation would be required to be controlled to greenfield runoff rates and for volume control could require further control to QBAR. The Technical Report estimates a range of runoff rates for different rainfall events but would appear to be consistent with the greenfield rate; however, attenuation volumes are calculated based upon a staged discharge and therefore may be underestimated, given that greater reduction in discharge rates may be required.<br>c)The Land Budget Plan does not appear to account for areas which will be lost to surface water management. This will have a direct impact on the number of residential units which may be included within the developable boundary.<br>d)Discharge rates would usually be agreed in consultation with KCC as LFA as well as the River Stour IDB. We would recommend also consulting River Stour IDB. Please send any consultation request to Enquiries@rslb.org.uk<br>e)We would note that the IDB is charging for any discharge to a watercourse within their district area and this is based upon the discharge rate from development. The applicant may need to bear this in consideration for development costs. |  |
| DEA020  | Land off Cross Road, Deal                                      | CT14 9JN | Deal  | Deal                  | Mill Hill                 | Preliminary Highways Review   | This development has now been granted planning consent therefore falls into the baseline Do-minimum assessment scenario.   |   |   |  |  |
| DOV001  | Land to the right of Gordon Lodge at the top of Vale View Road | CT17 9NP | Dover | Dover                 | Tower Hamlets             | <p>A representation was made at Regulation 18 in support of the site. Site is proposed for 23 units. An Arboricultural Assessment, sketch of Potential Landscape Treatment, a note on Landscape and Visual Matters and a Transport Assessment were also submitted.</p> <p>Suitable visibility to the south is required for vehicles exiting the site, to enable them to stop and wait for a vehicle travelling north past parked cars along Vale View Road towards the site access. It appears this can be achieved with the removal of three/four parked cars on each side at the north end of Vale View Road, and suitable speed restraint measures in the new access road to limit speeds to 20 mph. The proposal to introduce a pedestrian crossing point with built-out in Vale View Road, to the south of public footpath EBX3, is unlikely to work as residents of the proposed site are unlikely to walk southwards to cross and then walk northwards again on the other side of the road. The removal of three/four parking spaces on each side of the road at the north end (as above) would appear to provide the opportunity for pedestrians to cross directly to/from footpath EBX3, subject to suitable detailed proposals. Whilst the vehicular trips from the number of dwellings proposed are unlikely to have a severe capacity impact on the wider highway network, there is concern regarding the existing extent of on-street parking and lack of passing places in Vale View Road. Despite the potential addition of two parking spaces in the new access road, the removal/displacement of up to eight spaces at the northern end to achieve suitable vehicular and pedestrian access is of concern, particularly bearing in mind the potential for footways to be parked on/overrun by vehicles passing each other in Vale View Road.</p> |  |   |   |  |  |
| DOV008  | Land adjoining 455 Folkestone Road, Dover                      | CT17 9JX | Dover | Dover                 | Maxton, Elms Vale & Prior | Site Report and LVIA submitted in support of proposed allocation  |  |   |   | Removal of Farthingloe allocation would help reduce impacts on the AONB landscape. Retaining existing trees along the site's southern and western boundaries would help integrate development into the landscape, although would provide limited screening impacts in views from the higher topography to the south and east. Requiring retention of vegetation along the site's frontage with Folkestone Road (except where removal is required for access) and for any development not to exceed the height of the adjacent houses and provide sufficient spacing between built form and be designed to maintain views out to the landscape beyond would further help mitigate AONB impacts to an acceptable level.  |  |
| DOV012  | Western Heights and Farthingloe                                | CT15 7AA | Dover | Dover/Hougham Without | Town & Pier/Capel le Fern | <p>Criticises Western Heights SPD as restrictive, generally supportive of Plan policies</p> <p>Site shown as unachievable and is it classed as brownfield land</p>  |  |   |   | Support removal of allocation due to significant impacts on AONB   |  |
| DOV022E | Land in Coombe Valley, Dover                                   | CT17 0LG | Dover | Dover                 | Coombe Valley             | Representation in support of proposed allocation - viability concerns over purely residential scheme being investigated   |  |   |   | Support changes to policy wording re development density and site design to minimise impacts on the AONB   |  |

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| EAS009 | Eastry Court Farm, Eastry                               | CT13 0HL | Eastry           | Eastry                  | Eastry                  | Requests that Policy allows for more than 5 units, as masterplan has demonstrated these can be accommodated. Transport Note provided  | The supplementary submission has not addressed the issues that were raised through our Initial HELAA comments. There is an assumption by the land promoter that access would be achievable over third party land, however this is not substantiated by any documentation of access agreement/rights. Whilst in theory that would not prevent an initial allocation, it may have a bearing on the subsequent deliverability of the site should land access issues subsequently be identified. The existing access to the site is very narrow and would need to be improved. The suggested highway improvements at the Church Lane/Brook Street and Brook Street / Lower Street junctions are noted, however no draft plans have been provided to demonstrate that this would be achievable. Given the geometrical and topography of the highway in that location it is highly doubtful that meaningful improvements could be achieved.  |  |  |  |  |
| EYT002 | Farm land behind and accessed from Adelaide Road        | CT15 4DR | Elvington        | Eythorne                | Eythorne & Shepherdswe  | Representation made in support of the site at Regulation 18. Title deeds provided to confirm right of access to site from Adelaide Road.  | Additional information confirms a right of access via the existing track, however the referred title plan is not appended. Therefore it is unclear if there is a right to upgrade the access to accommodate the proposed development. Notwithstanding this, assuming that the entire access way is available to upgrade, there are potential visibility constraints at the access point with the existing highway and the junction would be located directly opposite an existing road junction which does not comply with junction spacing requirements within The Kent Design Guide. Therefore at this stage it has not been demonstrated that acceptable access could be achieved to this site.   |  |  |  |  |
| GTM003 | Land to the east of Northbourne Road, Great Mongeham    | CT14 0HJ | Great Mongeham   | Great Mongeham          | Eastry                  | Comprises Masterplan, Sketch Design document, Initial Access Appraisal, Landscape Appraisal. Reg18 rep submits masterplan for accommodating 10 dwellings on front of site, or 31 on wider site  | Agree with the submitted note that access is achievable. Although lack of footway will have a bearing on the travel choice and sustainability in transport terms and should be considered in line with wider sustainability considerations.  |  |  |  |  |
| GUS001 | Site between play area at Guston and Meadowcroft        | CT15 5ER | Guston/whitfield | Guston                  | St Margaret's at Cliffe | A representation has been made in support of the site. Further information has been provided to address the highways concerns raised in the HELAA, and advises that the promoter is willing to be work flexibly with the Council on unit numbers and housing types to be delivered on site. | It would appear that suitable vehicle access could be achieved along the site frontage, and there is scope for some localised widening of the Lane to improve traffic flow. The proposed allocation of 12 additional dwellings is unlikely to generate significant additional traffic flow in the peak hours, however there are concerns over the lack of pedestrian facilities to link the site to the existing footway network. There is a narrow section of road between the site and Guston Green which is geometrically constrained as such alternative pedestrian links would need to be explored. There may be scope to provide a pedestrian path within Guston Green, however this would need the agreement of the landowner.  |  |  |  |  |
| KIN002 | Land at Woodhill Farm, Ringwold Road, Kingsdown         | CT14 8DJ | Kingsdown        | Ringwold with Kingsdown | Ringwold                | Supporting proposed allocation - includes Landscape and Visual Assessment, Access Details and Speed Survey results  | Suitable access arrangements are now considered to be achievable within land that the site promoter has control over (using farmland on the south side of Ringwold Road). A moderate level of additional traffic likely to be generated by this development at the Ringwold Road/A258, however no assessment of traffic impact has currently been undertaken. It would be prudent to do this to confirm that this junction will continue to operate without significant additional delay. Cumulative impact of development on Duke of York junction should be considered and if necessary appropriate contribution made to required improvements.  |  |  |  | Objection to allocation removed, support changes to policy wording re development design, landscape buffer and tree planting |
| LYD003 | Land adjacent to Lydden Court Farm, Church Lane, Lydden | CT15 7JP | Lydden           | Lydden                  | Lydden & Temple Ewell   | Rep submitted in support of proposed allocation, incl Ecological Appraisal, Highways Note, potential Highway Improvement and Indicative Layout Plan   | We still have some concerns over the visibility at Church Lane / Canterbury Road. As per our previous comments it is potentially addressed through a change to the way in which traffic negotiates the routes around the drainage pond feature. It is suggested that a policy is included that specifically places a requirement on the site to provide improvements to the Canterbury Road/Church Lane Junction and improvements to PROW ER116 and associated pedestrian improvements on Canterbury Road.   |  |  |  | Support changes to policy wording re avoiding or minimising impacts on the setting of the AONB                               |
| NOR002 | The Former Packhouse, The Drove, Northbourne            | CT14 0LW | Northbourne      | Northbourne             | Eastry                  | Representation made in support of the site. Representation proposes a revised and scaled down scheme of 30 - 35 units to mitigate traffic impacts.  | There are still concerns over the suitability of The Drove to serve a development of 30 homes as access into the site is constrained, with poor visibility, however it far less likely to generate severe impact than the previously proposed 80 dwelling allocation. Clarification over exactly what permitted used exist on the site would be helpful in coming to a balanced view on residual highway impact (if any). Links to public transport are poor and there is no footway provision within the village.   |  |  |  |  |
| PRE016 | Site north of Discovery Drive, Preston                  | CT13 1FG | Preston          | Preston                 | Little Stour & Ashstone | Confirms site can come forward without PRE003 and PRE017 as advised in HELAA Suitability. Incl Masterplan, Transport Note   | Highways note provides some clarity over potential access points but does not adequately demonstrate that acceptable access can be achieved. The private drive leading from Grove Road to the site is 7-8 metres wide between boundary fences, which is wide enough to accommodate and adoptable road and footway, however there is then no onward pedestrian connection onto the wider highway network. It is still unclear whether pedestrian access into the private estate roads (including Red Pippin Lane) is available or that access rights are secured. The vehicular access from Grove Road is just outside the 30 mph limit. The visibility available to the west of the access is approx. 2.4 metres x 115 metres, to 0.5 metres off the nearside edge of carriageway. The visibility available for a driver waiting to turn right into the access, to a driver approaching from the west, is approx. 90 metres. Both are limited by the curve of the road, with no highway verge available on the inside of the curve. Therefore a speed survey would be required to the west of the access to determine if the available visibility at this access is appropriate. |  |  |  |  |

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| RIN002 | Land at Ringwold Alpines, Dover Road, Ringwold - site submitted 4 times by Lee Evans for B1, care home, holiday accommodation | CT14 BHG | Ringwold                | Ringwold with Kingsdown    | Ringwold                 | <p>A representation has been received which questions the PDL status of land and states that it should be recorded as greenfield.</p> <p>A representation has also been received from the site promoter requesting that RIN002 and RIN004 should be allocated together to prevent RIN002 from becoming landlocked. The two sites combined have capacity for up to 41 dwellings</p>  |  |  |  |  | No objection to inclusion of RIN002   |
| RIN004 | Ringwold Alpines, Dover Road, Ringwold  | CT14 BHG | Ringwold                | Ringwold with Kingsdown    | Ringwold                 | <p>Queried PDL status of land and AONB location</p> <p>Reg18 rep advised that RIN004 and RIN004 should be allocated in conjunction to prevent RIN002 becoming landlocked, giving capability for up to 41 dwellings</p>  |  |  |  |  | Support changes to policy wording re sensitive site design and the retention and enhancement of trees and hedgerows |
| SAN004 | Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich                                      | CT13 9LY | Sandwich                | Sandwich                   | Sandwich                 | <p>Representation provides further information in support of this HELAA site to demonstrate how the site could be developed in a way that would minimise harm to the scheduled monument on the site. An illustrative masterplan plan has also been provided. The representation details discussions that have been undertaken with Historic England who we understand have now removed their objection to the proposals. However we are yet to receive written confirmation of this. A Note on Archaeology has however been provided. With regards to flooding the site promoter states that the issues raised in the HELAA 2020 can be mitigated and has attached a Flood Risk Scoping Assessment for consideration.</p> |  |  |  | <p>Biodiversity – All developments must adhere to the, soon to be, compulsory Biodiversity Net Gain of a minimum of 10% increase. All works will require ecological surveys and Ecological Impact Assessments (EIA) to assess any potential impact on ecology. Should protected species be found to be on site, mitigation and/or compensation methods will need to be in place prior to the commencement of works. Invasive Non-Native Species (INNS) surveys will also need to be conducted and any found on site must be treated to prevent their spread. Sufficient systems must be in place to ensure that run-off and discharge does not negatively affect the aquatic and riparian environments. When developing next to Main River, a minimum of an eight metre buffer zone must be in place to maintain and enhance the river corridor.</p> |   |
| SAN008 | Woods' Yard, rear of 17 Woodnesborough Road, Sandwich   | CT13 0AA | Sandwich                | Sandwich                   | Sandwich                 | <p>Highways Technical note provided</p>   | <p>It is agreed that when compared to extant permitted uses on the site, the proposed quantum of development is unlikely to generate a significant residual increase in traffic, and the removal of commercial goods vehicles is also a material consideration. There would however be a small increase in trips on the surrounding highway network, as such it may still be necessary to review on street parking restrictions on Woodnesborough Road in order to manage potential vehicle conflict and it is recommended that the site provides replacement on street parking within the development. Improvements to the access into the site would also need to be provided as per previous supplementary submissions for this site.</p>   |  |  |  |   |
| SHE003 | Land to the north of Westcourt Lane, Shepherdswell  | CT15 7PU | Shepherdswell           | Shepherdswell with Coldred | Eythorne & Shepherdswell | <p>Arboricultural, ecology, FRA &amp; drainage, Geology, highways, LVIA and master plan and architectural drawings sent in support of proposed allocation</p>   | <p>Whilst the additional submissions provided by the site promoter provide some clarity over matters such as junction capacity at Westcourt Lane and Coxhill Road, there still remains concern over the level of traffic that this allocation will generate on Westcourt Lane. This is narrow with limited passing opportunities in both directions and no pedestrian facilities, therefore this would increase potential vehicle/pedestrian conflict/interaction to the detriment of highway safety and the free flow of traffic. Whilst some conceptual improvements have been identified at the eastern extend of Westcourt Lane, there is still a level of uncertainty over the deliverability of said widening, and it is apparent that the Western section of Westcourt Lane cannot be improved without third party land. Notwithstanding the above, there are still some initial concerns over cumulative impact of this and other Local Plan sites on the Coxhill Road corridor which is subject to constrained geometry. Whilst we are not inferring that there is zero additional capacity of additional traffic movements, this needs to be appropriately assessed and any improvements to passing points or localised widening need to be located in the right places and not just where highway boundary allows. Therefore at this stage we would suggest that this proposed allocation is still subject to both site specific highway concerns (Westcourt Lane geometrical constraints) and wider concerns (Coxhill Road capacity in relation to the wider cumulative Local Plan impacts).</p> |  |  |  |   |
| SHE004 | Land to the north and east of St Andrew's Gardens, Shepherdswell  | CT15 7LP | Shepherdswell           | Shepherdswell with Coldred | Eythorne & Shepherdswell | <p>Site contact changed to CAD Solutions<br/>Site contact changed to Karen Banks @ Rebus Planning</p>   | <p>Scope for access appears to be achievable via St Andrews Gardens, on its own the 24 dwellings proposed is unlikely to generate a severe impact on the surrounding network, however it is important to consider the cumulative impact of all development proposed within the area on common road links such as Coxhill Road.</p>   |  |  |  |   |
| SHE006 | Land at Botolph Street Farm   | CT15 7NH | Shepherdswell           | Shepherdswell with Coldred | Eythorne & Shepherdswell | <p>Advises 20 units should be treated as indicative as masterplan hasn't been developed yet. Transport Note provided</p>  | <p>The supplied information does not provide any further clarity over the points raised within our initial HELAA comments. The site remains relatively poorly served in terms of pedestrian links.</p>   |  |  |  |   |
| SHE013 | Land around Coldred   | CT15 5AP | Dover                   | Shepherdswell with Coldred | Eythorne & Shepherdswell | <p>Representation queries why site was deleted from the HELAA and asks that it be re-assessed. Site is promoted for 5 self build dwellings. A planning application has also been submitted.</p>   | <p>Vehicle access achievable from Coldred Road, however there are no pedestrian facilities within the village which will have a bearing on mode of transport and development in this location is likely to rely on private vehicles. 5 dwellings is unlikely on its own to generate a severe impact on the surrounding highway, however should be considered cumulatively with other Local Plan sites.</p>   |  |  |  |   |
| STM003 | Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way                                    | CT15 6AH | St Margaret's at Cliffe | St Margarets               | St Margaret's at Cliffe  |   |  |  |  |  | Support changes to policy wording re design and landscaping scheme  |
| STM006 | Land at New Townsend Farm, Station Road, St Margarets   | CT15 6ES | St Margaret's           | St Margarets               | St Margaret's at Cliffe  |   |  |  |  |  | Support changes to policy wording re sensitive site design and retention and enhancement of trees and hedgerows     |

|        |  |          |               |              |                         |  |   |  |  |  |  |
|--------|--|----------|---------------|--------------|-------------------------|--|---|--|--|--|--|
| STM007 | Land to the west of Townsend Farm Road, St Margarets (Site B)                | CT15 6JE | St Margaret's | St Margarets | St Margaret's at Cliffe | Landscape & Visual Impact Assessment provided  |   |  |  |  | Support changes to policy wording re design of buildings, sensitive landscaping and primary access   |
| STM008 | Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)      | CT15 6EP | St Margaret's | St Margarets | St Margaret's at Cliffe | Landscape & Visual Impact Assessment provided  |   |  |  |  | Support changes to policy wording re design of buildings, sensitive landscaping and primary access   |
| STM010 | Land located between Salisbury Road and The Droveway, St Margarets-at Cliffe | CT15 6DL | St Margarets  | St Margarets | St Margaret's at Cliffe | Representation made in support of the site. Site is promoted for between 7 and 12 units. Submission also includes: Options for site layout, Land Registry Plan and an Access and Transport technical note. Site is confirmed as available. Site has also been submitted through Targeted Call for Sites (REF -TC45073) | No clarification provided over rights of access over Salisbury Road which is private and as such not part of the adopted highway network. Access may be possible via the Droveway, however there does appear to be a gap between the red line boundary and the adopted highway which will need to be clarified. This smaller scale development is far less likely to cause traffic conflict issues (when compared to the previously suggested 78 dwellings) There may need to be some localised widening on The Droveway opposite the site which could have an impact on existing tree planting. Visibility at the junction of Salisbury Road/The Droveway is constrained, as such it access via The Droveway would be more appropriate.  |  |  |  | Acknowledge changes to policy wording; consider it essential for the inclusion of an additional requirement for any built development to be located on the lower parts of the site (i.e. avoiding the higher central ridge) and a requirement for the retention of the woodland in the south-western corner of the site. |
| TLD03  | Danefield House, St Mary's Grove, Tilmanstone                                | CT14 0JS | Tilmanstone   | Tilmanstone  | Eastry                  | Representation made in support of this site and responds to the issues identified in the HELAA 2020. Site is promoted for 20 units. Representation includes a Transport Technical Note, Access Arrangements and TRICS assessment.  | Technical Note indicates access only from St Mary's Grove, rather than also from Dover Road as suggested in the accompanying letter. Appears suitable visibility may be achievable at some point along site frontage in St Mary's Grove. Existing road would also need widening up to Dover Road, or at least passing places provided. The measured speeds suggested have not been verified but in any case appear too high for imposition of a 30 mph speed limit, and it has also not been demonstrated that the other necessary criteria for a 30 mph limit have been met. As such there is concern regarding the lack of visibility at the junction of St Mary's Grove with Dover Road. Unlikely on its own to have a severe capacity impact on the highway network. No footways serving site.  |  |  |  |  |
| WIN014 | Footpath Field, Staple Road, Wingham,  | CT3 1AL  | Wingham       | Wingham      | Little Stour & Ashstone | Supporting proposed allocation - Transport Feasibility Study, Landscape Statement and Opportunities and Constraints Plan, Wintering Bird Survey, Ecological Impact Assessment, Air Quality Assessment  | The original site capacity was stated to be 30 dwellings whereas this spreadsheet suggests 67-81. The supporting evidence considers 100 dwellings. The note clarifies initial assessment that a suitable form of access junction can be achieved into the site. Whilst the appraisal suggests that this site will generate a moderate amount of additional traffic (on its own), it needs to be considered on a cumulative basis with other proposed allocations within the Local Plan. Neither the junction of Staple Road/B2046 or the B2046/A257 has been assessed for capacity constraints, with the latter being an existing pinch point on the local road network and subject to constrained geometry and as such will be sensitive to additional traffic pressure. It is suggested that these junctions are assessed as part of the wider Local Plan modelling evidence base or in combination with other site promoters in the Aylesham/Wingham area. |  |  |  |  |