

Dover District Council

Development Management Workshop

The Ark, Dover, Friday 12th October 2018

Introduction

Dover District Council has commenced a Local Plan Review that will cover the period up to 2037. In order to inform this process, a series of workshops has been organised to obtain initial thoughts on aspects of a new vision, objectives and policies for the District, and to reconsider how we make allocations for new housing. The focus of the events was on a fully participative process with small group discussions and clustering of outcomes.

This fourth workshop held at The Ark, Dover on 12th October 2018 involved stakeholders with a special interest in policies related to Development Management.

The workshop was facilitated by Peter Woodward and Mia Forbes Pirie, experienced independent facilitators. This report contains all the outcomes from the group discussions. These have been accurately transcribed from notes taken by the small group facilitators. Inevitably they will require further reflection and refinement during the Local Plan preparation process.

Participants in attendance were from the following organisations:

- Barton Willmore
- Corstorphine & Wright Architects
- CYMA Architects
- Design Architecture Ltd.
- DHA Planning
- Dover District Council – Corporate Estate and Coastal Engineer
- Dover District Council – Environmental Health
- Dover District Council – Legal
- Dover District Council – Natural Environment
- Dover District Council – Members of the Development Management Team
- Dover District Council – Senior Architect
- Dover District Council – Climate Change
- Finns
- Folkestone and Hythe District Council
- Historic England
- Kent County Council – Archaeology
- Kent County Council – Highways
- Kent Downs AONB Unit
- Lambert and Foster
- Lee Evans Planning
- Persimmon Homes
- Peter Bernamont Architect
- S C Green

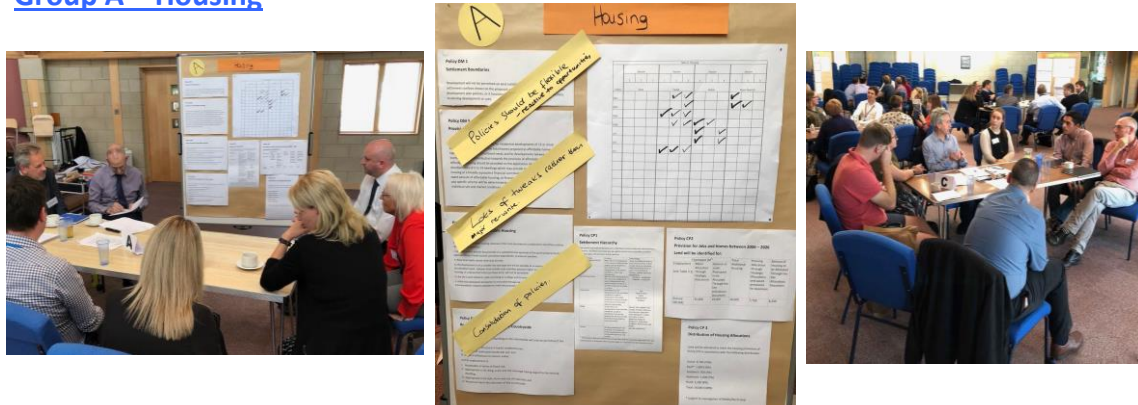


Reviewing the development management policies

The aim of the workshop was to give representatives an opportunity to review and discuss the existing local plan policies (Dover District Local Plan, Core Strategy, Land Allocations Local Plan) and suggest additional policies.

Participants attended 3 rounds of small group discussions. These were noted by table facilitators from the Planning Department as follows:

Group A – Housing



Policy DM1: Settlement Boundaries	
Suggested change:	Rationale:
<p>Need policy as you need some idea of where development is acceptable.</p> <p>General support, but needs tweaking</p> <p>Tweaking policy or could you combine with Policy CP1?</p> <p>Need to reflect exception to the rules</p>	<ul style="list-style-type: none"> - Too prescriptive. - Good opportunity on the edge of settlements - Cannot pigeonhole sites as come out of the wood work - Should be more flexible - Need windfall sites - Do not want sporadic development - Should be some form of exception rule - Helpful to start somewhere! - Creates too much uncertainty - Define what is acceptable – development found on settlement confine – rare occasion could be acceptable if no harm to the countryside. - Carefully drawn with landscape protection and to allow for the expansion. - Confines must be logical (needs an additional policy in the plan to justify development beyond confines). - Pre-NPPF. Not positively worded as it could be missing some flexibility - Do you still need confines? Some LPAs refer to the built environment. Other Councils (e.g. Wealdon) identify broad areas for growth. - Positively plan for growth if it addresses local housing need. - Start the text in the policy more positively as it is currently worded negatively. - Should the policy be linked to the settlement hierarchy? - Combine policy DM1 and CP1. - Expand CP1.
Policy DM5: Provision of Affordable Housing	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Needs to set out a starting 	<ul style="list-style-type: none"> - Needs flexibility

<ul style="list-style-type: none"> - position - Major re-write required to make it consistent with NPPF - Elements – larger sites or smaller site financial contribution 	<ul style="list-style-type: none"> - Logistics of delivering affordable housing on small sites is sometimes very difficult - Criteria of 10 dwellings is no longer compliant with NPPF - Policy currently does not mention infrastructure - Do not want to make the policy town-specific? - Brought in line with the NPPF. - At the moment it is 30% or nothing - At the moment do not negotiate - Should the policy offer the possibility for a financial payment or should you set out what you want to achieve - Needs to be above '10' units to be in line with NPPF - Threshold out of date - Very long policy could be shortened - Simplify into categories - Is 30% across the District or should it be different? Up to date summary of need - Could define the viability more - Need to caveat the viability to be in line with NPPF. This could be in a SPD?
Policy DM6: Rural Exception Affordable Housing	
Suggested change:	Rationale:
Tweaking the policy in terms of looking at Entry Level exception sites (para. 71 of the NPPF)	<ul style="list-style-type: none"> - Updated to reflect para. 71 of the NPPF - Does this cover starter homes? - Is it covered by other policies? - Need more justification than the needs of the PC - Relook at the policy in light of the NPPF - Should start by tightly defining the confines and then this policy should look at those exceptions - Could make the policy very permissible - Principle something to retain
Policy DM8: Replacement Dwellings in the Countryside	
Suggested change:	Rationale:
<p>Tweak or delete!</p> <p>Do you need this policy?</p> <p>Out of date?</p>	<ul style="list-style-type: none"> - Picking out the criteria that are still appropriate - At the moment there are two different objectives: permanent structure/lawful use in criterion (i) - Must be in a generic design policy - Criteria (ii) – very restrictive (existing dwelling and context) - Criteria (iii) – of no architectural or historic value – what is this? - Unsure what it's aiming to achieve? - Flood-risk dealt with already – no need for this in the policy (lose last part of the policy) - First three criteria guide me to what I should be looking for
Policy CP1: Settlement Hierarchy	
Suggested change:	Rationale:
<p>Local Centre:</p> <p>GP Surgery:</p>	<ul style="list-style-type: none"> - Principles helpful but needs to be reviewed. - Possible refinement of the "hamlet" - Good starting point to look at the services and facilities - Trying to identify most sustainable settlement - Sustainability hierarchy. - Not the settlement itself. - Justification sound but whether it has the flexibility? - Need to consider how you treat hamlets. - Do not need to stick with the status quo – just because it

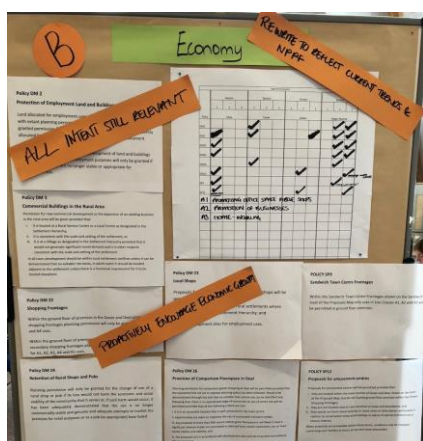
	<ul style="list-style-type: none"> - is a hamlet , should it always be a hamlet? - Should be open-minded. - Expect some form of shop, some form of accessibility/connection to a larger settlement. - Possibly “function” in the text rather than the policy.
Policy CP2: Identified Need	
Suggested change:	Rationale:
Do not need policy CP2	<ul style="list-style-type: none"> - Informative rather than a policy - Do you need this in a policy?
Policy CP3: Settlement Distribution	
Suggested change:	Rationale:
Do not need policy CP3	<ul style="list-style-type: none"> - This information can be in a table in the LP rather than a policy - Do you need this as a policy?
SUGGESTED NEW POLICIES:	
Agricultural Dwellings <ul style="list-style-type: none"> - Circumstances for an agricultural dwelling (financial and function test). - Recognise vacant building credit - Circumstances that the conversion of a rural building would be acceptable <p>BRT – there is currently no specific policy on BRT so there is no mechanism for smaller sites to pay for this as it falls on the larger sites</p> <p>Do you need a policy in order to allow you to switch your strategy if you are not delivering housing in a certain area?</p>	

Table A: Housing												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
DM1								✓	✓	✓		
DM5									✓	✓	✓	
DM6							✓	✓	✓			
DM8				✓	✓			✓	✓			
CP3				✓		✓						
CP2				✓		✓						
CP1							✓	✓	✓			

Group A: Overall Observations:

- Policies should be flexible – reactive to opportunities
- Lots of tweaks rather than major re-write
- Consolidation of policies

Group B – Economy



Policy DM2: Protection of Employment Land and Buildings	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Clarifications of definitions to help architects/developers - Setting out rules in terms of viability - Narrowing down requirements - Needs more definition but not so it's too prescriptive - Wording for refusal needs tweaking - Good policy for protecting high street - 'Viable' and 'Appropriate' need clarifying - Providing information on what is needed to proving viability (general idea on how an application can be supported) - Self-referencing - The way it's written shouldn't be negative - Concern/consideration should be given to PD rights - Lines with B1/B8 blurry - Negative wording (comes from the stance of "no") so should be changed to positive wording - The inclusion of criteria would be helpful 	<ul style="list-style-type: none"> - Wordy in its current form - Agree with it in principle - Good policy for protecting high street - Policy annoys clients – scuttles projects - A little over protective from architectural perspective - Current policies open door to interpretation - Generic but necessary - Review to ensure in line with the NPPF - Worth in protecting employment land – supporting strategy - Respond to trends and market changes - Want appropriate uses to work with each other - 'Not making it too precise' - is it about economic viability?
Policy DM3: Commercial Buildings in Rural Areas	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Change "it is consistent" to "complements" - Look at a word that is different (e.g. that would enable design and safeguard policy) . For example "<i>sympathetic</i>" - The policy needs to give an opportunity to do something different but is also <i>sympathetic</i>. - Reflect character of setting - Emphasis needs to change - Consideration should be given to 	<ul style="list-style-type: none"> - It is needed and clear in what the policy is asking for - Inflexible and restrictive - Restrictive in practice - Enables freedom for the architect to explore design - Conflicting thoughts from DM officers regarding whether the policy currently works well - Bringing terminology in line with NPPF

<ul style="list-style-type: none"> - amending wording - Review grammar of existing policy - Could be simplified and made more succinct - Duplication – refrain from referring to things that are already covered elsewhere in Local Plan - Rural area isn't defined - Potential conflict with sequential test - Last paragraph sounds like DM1 – potential duplication 	
Policy DM22: Shopping Frontages	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - See SP9 comments below - No changes! - Merge DM22 and SP9? - Recognise nature of town centres need to be changed – current trends - Incorporate leisure uses - Expand use classes to be more flexible to encourage more footfall - Policy to diversify the town centre - NPPF – broad definition of uses - Potential to expand use or make reference to town centre uses in the NPPF - Keep it current! - Is it necessary to specify uses for primary/secondary (potential to only refer to TCB) 	<ul style="list-style-type: none"> - From architectural perspective the policy is out of date - Cover Dover and Deal only (and use SP9 for Sandwich) – a single policy covering all towns is most preferred - Key to have an active frontage - Easy to use – clear (style is right and intent is right) - Does what it sets out to do - Clear and concise - Helpful from a Development Management perspective - Need for flexibility to reflect changes in trends and patterns - Businesses want to move out
Policy DM23: Local Shops	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - No need for policy (would come under general strategic policy) 	<ul style="list-style-type: none"> - Works well - Unsure of purpose - Considered as common sense so doesn't require a policy - Currently policy not used - Subject already covered by principles in the NPPF
Policy DM24: Retention of Rural Shops and Pubs	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - No changes - Consider tying in 'community value' element - Policy OK but needs more work and signposting - <i>"Genuine and adequate attempts"</i> requires more clarification (e.g. on specifications/requirements/marketing) - To avoid interpretation - Marketing strategy – other community uses 	<ul style="list-style-type: none"> - Important in principle - Currently covers everything it should - Policy is needed - From an architectural perspective the policy is out of date and there is a need to recognise current and future trends - Needs to align with NPPF
Policy DM26: Provision of Comparison Floor Space in Deal	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Clarification on what is meant by <i>"comparison"</i> – does it relate to town 	<ul style="list-style-type: none"> - Need to consider convenience to comparison – Dover District not just Deal

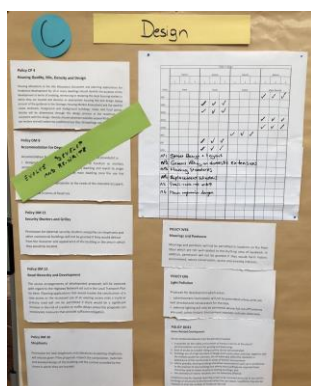
centre uses? - Major re-write (incorporate into strategic policy)	- Repeating sequential test - Keep up to date with what is going on - Necessary policy to have - Long but clear
Policy SP9: Sandwich Town Centre Frontages	
Suggested change:	Rationale:
- Merge with DM22 - Review to determine how to incorporate Sandwich into DM22	- Potential duplication of DM22 - Use for Sandwich (and use DM22 for Dover and Deal) - no need to have multiple policies
Policy SP12: Proposals for Amusement Centres	
Suggested change:	Rationale:
- Does it give the same level of protection to Dover and Sandwich (if required)? - Better suited to a strategic policy rather than place-making policy? - Is this still relevant for Dover (attempts to reduce deprivation and gambling etc.)?	- Protects Deal sufficiently - Large repetition of what is set out in the NPPF
NEW POLICIES:	
- Promoting office space above shops - Promotion of businesses - Home-working – recognition of changing habitat and need for good broadband	

Table B: Economy												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
DM2							✓				✓	✓
DM3							✓				✓	✓
DM22	✓										✓	✓
DM24	✓										✓	✓
DM26							✓				✓	
DM23	✓				✓							✓
SP9	✓										✓	
SP12	✓				✓							✓
A1	Promoting office space above shops											
A2	Promotion of businesses											
A3	Home-working – recognising impacts of changing working habits (e.g. office space/broadband)											

Group B: Overall Observations:

- Re-write to reflect current trends and NPPF
- All intent still relevant
- Proactively encourage economic growth

Group C – Design



Policy CP4: Housing Quality, Mix, Density and Design	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Include electric charging points - High density not always desirable from access and parking perspectives except in urban hubs (need also to be wary that capacities can become targets) - Layout shaped to avoid external noise - Should layout and parking considerations be moved into a separate policy? - Should the policy also apply to developments of less than 10? - The section regarding purpose of housing should be retained - Possibly separate out in different issues? 	<ul style="list-style-type: none"> - Reflect NPPF - NPPF does not specify any density - Presentation of parking needs review. - The policy covers three separate aspects and it might be clearer if they were dealt with in separate policies
Policy DM9: Accommodation for Dependant Relatives	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - The supporting text suggests accommodation should be attached which may not be flexible enough - Addresses a relevant issue - The term "dependent" may be not be appropriate to describe today's need - What does 'principal' mean? As opposed to main - Why include flood risk? 	<ul style="list-style-type: none"> - Issue may be stronger now with younger people living with parents longer. - Helps with social care - the pressure on social services is a growing national issue
Policy DM12: Parking Provision	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Some parts outdated but prevention of new accesses onto primary roads is still relevant. - Needs review to take out vagueness e.g. mitigation measures. 	<ul style="list-style-type: none"> - Needs major review in light of the new NPPF
Policy DM20: Shop Fronts	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Merge with DM21? - Include consideration of heritage 	<ul style="list-style-type: none"> - DM21 addresses a closely related matter
Policy DM21: Security Shutters and Grilles	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Still valid but review in case of updating (see how contemporary conditions have been framed) 	<ul style="list-style-type: none"> - Protects street scene especially in regeneration centres and town centres

Policy DD21: Horse Related	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Still relevant but some review needed drawing on up-to-date conditions - Review taking account of AONB guidance - Consider cumulative issue of character of landscape 	<ul style="list-style-type: none"> - Still relevant but update/review
Policy ER6: Light Pollution	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Need to review effectiveness and whether EH exercise sufficient control anyway - Is there a dark skies angle to this? - Possibly separate out advert lighting into advert policy? 	<ul style="list-style-type: none"> - Evidence base and NPPF
Policy WE6: Moorings and Pontoons	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Is it still needed? 	<ul style="list-style-type: none"> - Review the evidence
Additional:	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - A1 – Street design and layout - A2 – General policy on domestic development and small-scale - A3 – Optimal housing standards - A4 – Replacement windows especially in conservation areas - A5 - A policy to require development to respect its context. Solution to be contextual and place-responsive 	<ul style="list-style-type: none"> - Promote early consideration in design process - Take NPPF option

Additional points:

- Endorse highway layout not leading design process.
- Design guidance not to stifle creativity. Context does not mean copy.
- Optimal housing standards not considered beneficial by some of the group (Middle Street Deal could not be built under them).
- Counter views relating to conversions
- Consider experience of Maidstone and Ashford and Medway.
- New NPPF requiring high quality design – our chance to say what this means in Dover

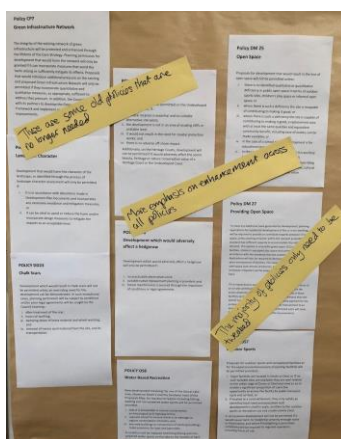
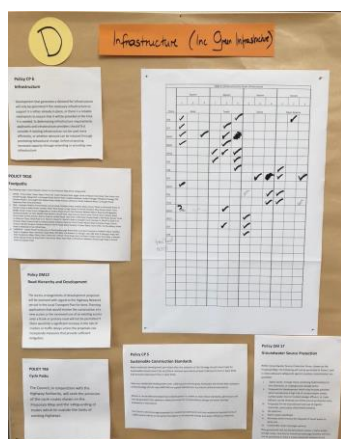
Table C: Design												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
CP4										✓	✓	✓
DM9							✓	✓	✓			
DM21							✓	✓	✓			
DM12										✓	✓	✓

DM20										✓	✓	✓
WE6				✓	✓	✓						
ER6							✓	✓	✓			
DD21							✓	✓	✓			
AP1	Street design and layout											
AP2	General policy on domestic extensions											
AP3	Housing standards											
AP4	Replacement windows											
A5	Small-scale res. up to 9											
A6	Place responsive design											

Group C: Overall Observations:

- Evolve, develop and re-write

Group D – Infrastructure



Policy CP5: Sustainable Construction	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - We need more strength in this - Does the Council have carbon-neutral aspirations? - Big question of how we can show the evidence locally - Top priority should be energy and water efficiency - Orientation of buildings - Need to require more power points so builders can use electricity during construction to reduce air pollution from generators - Building regulations are the best way to impose construction standards because then it doesn't mess up the construction 	

<ul style="list-style-type: none"> - programme - Shouldn't be a disconnect between planning department and building regs. 	
Policy CP6: Infrastructure	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Keep the policy - Mechanism to collect the money must be stronger – it puts too much onus on using existing infrastructure - Travel plans are weak and should secure infrastructure at the start - Policy should identify key infrastructure items - This policy seems to limit development to areas where there is already development - Wording is confusing – the word 'infrastructure' is used too frequently. - Not strong enough nor clear - Should be in accordance with the adopted infrastructure delivery plan, speculative developments will have to pay for revision of the IOP - Shorten to just the first sentence – doesn't need the second sentence within the policy and it could be moved to the supporting text. - What is the scope of 'infrastructure' 	<ul style="list-style-type: none"> - Major re-write
Policy CP7: Green Infrastructure	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Broadly sensible, but could be stronger on improving and increasing amount and connectivity. - Is supported by a map which identifies areas that should be protected - 'Green infrastructure' needs to be more closely defined? 	
Policy DM12: Road Hierarchy and Development	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - It is out of date because based on Kent and Medway access plan - But needs to be retained with different wording to recognise the application is being dealt with in local context - If a business wants to widen their access to increase trade the hours of use could be controlled to promote local amenity, should also cover locally important roads 	NPPF does not cover this
Policy DM16: Landscape Character	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Keep this policy - DM would like a policy for this designation - We should have a specific policy for AONB (see New Policies below) - Should have a more positive spin - Development should enhance the character of the landscape/should tie into landscape character assessment 	<ul style="list-style-type: none"> - Landscape character and heritage coast are different concepts - Natural England provide the professional view on SSSI's etc. but this is relates to landscape. Used a lot - Heritage coast is a landscape designation - Very important change – the first line: 'Development that harms will be refused'

<ul style="list-style-type: none"> - Applications should identify which area they fall into and how they will contribute to that character - How does this relate to DM15? PWS says that countryside is landscape – why do we have two policies? This must be clarified. - Needs to be tied down more by linking to the landscape character assessment 	<p>should be replaced with a positive statement first. Conserve and enhance not just prevent</p> <ul style="list-style-type: none"> - Is out of step with the NPPF
Policy DM17: Ground Water Protection	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Keep largely as is but what does ‘adequate safeguards’ mean? Should be very robust 	
Policy DM25: Open Space	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Open space standalone policy should stay but could be supported by improved mapping i.e. rationale for each protected space 	
Policy DM27: Providing Open Space	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - When green space is being designed use WHO standards re: noise - Raise the threshold to ten houses 	<ul style="list-style-type: none"> - so that open space can be enjoyed quietly
Policy CO5: Undeveloped or Heritage Coasts	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Most of our coastline requires protection and the policy should say development is ‘not permitted’ if it requires new sea defences - Undeveloped or heritage coast – the application of this policy to each category is not clear - Character of the coast is one point – this could be covered in DM16 - The policy should mention shore line management plans in the explanatory text - Check the Canterbury local plan – developer must be aware 	<ul style="list-style-type: none"> - Current policy is too light – needs to be stronger
Policy CO8: Development Which Would Adversely Affect a Hedgerow	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Retain! - Does it mean hedgerows in all locations – this should be defined – maybe only those that contain 5 species or more? 	<ul style="list-style-type: none"> - Tie into the background legislation
Policy DD23: Chalk Scars	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete 	<ul style="list-style-type: none"> - Covered by landscape policies
Policy OS7: Outdoor Sports	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Could merge with DM27 - Impact of any illumination would be dealt with as an amenity issue and this is covered elsewhere 	
Policy OS8: Water-based Recreation	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Get rid of this policy 	<ul style="list-style-type: none"> - Too specific to Stonar – bats are covered by other legislation

Policy TR9: Cycle Paths	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Link to TR10 – Footpaths - Applications to demonstrate how they link to sustainable modes of transport - Should be within 100m of a bus stop where reasonable especially cycle paths which cannot always be provided within the existing network - New cycle paths should be linked to an existing network 	<ul style="list-style-type: none"> - NPPF is too vague on this point
Policy TR10: Footpaths	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Not needed – naming footpaths is not necessary - Each development to provide evidence of how it will link with sustainable modes of transport - Promote sustainable modes within the site and aim to link 	<ul style="list-style-type: none"> - Have sustainable modes of transport policy combining footpaths, cycling
NEW POLICIES:	
<ul style="list-style-type: none"> - New policy on AONB (there is a model policy available) not in the management plan would link the management plan to our local plan. - Why do we have heritage coast, not AONB? 	

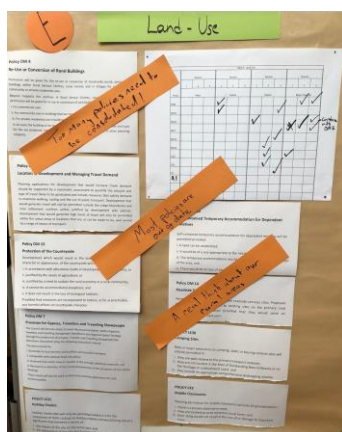
Table D: Infrastructure												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
CP6	✓								✓		✓	
CP7	✓							✓				
DM25	✓		✓					✓				
DM27	✓							✓				
DM16							✓	✓	✓			
CO5							✓		✓			
CO8									✓	✓		
CP5					✓					✓		✓
DM17	✓											
TR9						✓				✓		
TR10						✓				✓		
DM12	?							✓				
DD23				✓								

OS7				✓				✓				
OS8				✓								

Group D: Overall Observations:

- There are some old policies that are no longer needed
- More emphasis on enhancement across all policies
- The majority of policies only need to be tweaked

Group E – Land Use



Policy DM4: Re-use or Conversion of Rural Buildings

Suggested change:

- Remove criteria that makes this policy specific to settlement confines
- Do we need the word 'scale' in the last sentence.
- Add requirement for a structural survey (in some but not all circumstances)
- An over-riding design policy is needed to be read in conjunction with this policy.
- Don't agree that there is a need to make a requirement for structural reports.
- Remove/change settlement criteria
- Keep last sentence?
- The consequential impact of development needs to be managed
- Need for structural reports
- Reword to have an AONB specific policy
- Or potential for there to be an additional AONB policy
- Overall keep but re-write

Rationale:

- Existing policy does not reflect presumption in favour of sustainable development under Para 11 NPPF
- Bringing building back into use and best use of existing resources
- Re-use and conversions of existing buildings is a valuable source of housing
- Retaining existing settlement criteria will enhance countryside
- Does not reflect updated PD rights
- Last sentence of the policy should be kept to ensure that development is sustainable
- Currently can't determine whether building is structurally sound so structural reports are needed
- Policy is out of date
- Policy should be deleted as is overly restricted and does not comply with the current NPPF
- AONB specific policy is needed as PD rights do not apply within the AONB

Policy DM7: Provision for Gypsies

Suggested change:

- Rewrite to be helpful for existing site.
- Criteria needed to deal with utility blocks.
- Additional criteria needed with respect

Rationale:

- Current policy does not reflect current NPPF requirements

<ul style="list-style-type: none"> - to environmental protection - There is a need to include criteria around how we treat utility buildings. - There is a need for new criteria that considers extensions to existing sites - How do we deal with infrastructure? 	
Policy DM10: Self-contained Accommodation for Dependant Relatives	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete 	<ul style="list-style-type: none"> - Should be covered by a reworded DM9 policy. - Practical difficulties around ensuring remains temporary
Policy DM11: Location of Development and Managing Travel Demand	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete but ensure it's covered within the CP6 type policy - How to fit with future needs and current NPPF 	<ul style="list-style-type: none"> - Current policy does not add much
Policy DM14: Roadside Services	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete 	<ul style="list-style-type: none"> - Overly restrictive and does not comply with NPPF
Policy DM15: Protection of the Countryside	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Rewrite and merge with DM 16 - Reworded policy is needed that comes at this from a more positive angle in line with the NPPF 	<ul style="list-style-type: none"> - Doesn't comply with NPPF
Policy CF2: Mobile Classrooms	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete 	<ul style="list-style-type: none"> - Covered by KCC
Policy LE30: Camping Sites	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Rewrite so more positive - More flexible criteria. Reference to landscape character needed. - Change criteria to ensure quality particularly in the AONB and other protected areas - Question whether still needed as a standalone policy or whether a more general tourist accommodation policy is required. 	<ul style="list-style-type: none"> - Out of date - Just saying 'no' to new sites is not in line with corporate plan objectives to increase tourism
Policy LE31: Holiday Chalets	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Delete and rework into general camping and holiday policy 	<ul style="list-style-type: none"> - Too restrictive
NEW POLICIES:	
<ul style="list-style-type: none"> - Should have an AONB specific policy for re-use of buildings in the countryside - There should be a general protection of the AONB type policy - New general policy for tourist accommodation. 	

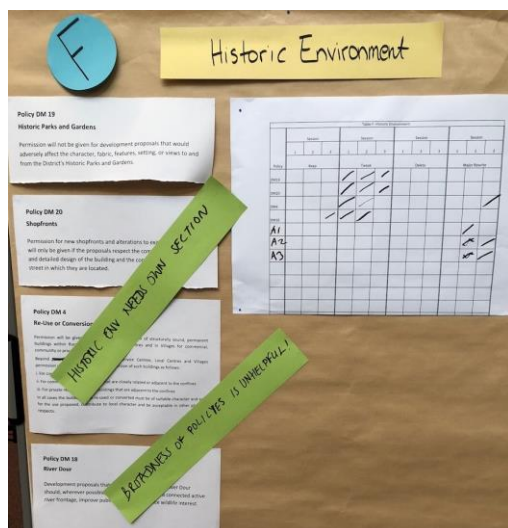
Table E: Land Use				
Policy	Session	Session	Session	Session

	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
DM4							✓				✓	✓
DM11						✓	✓					
DM15				✓								✓
DM7											✓	✓
DM10						✓						
DM14					✓							
LE30					✓					✓		
LE31					✓							
CF2						✓						

Group E: Overall Observations:

- A real think about our rural areas
- Most policies are out of date
- Too many policies need to be consolidated!

Group F – Historic Environment



Policy DM4: Re-use or Conversion of Rural Buildings (Heritage Element)	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - "Suitable for Conversion" – is this sufficient? Does it explain enough? - Possibly means "suitable to significance of building"? - "Adjacent to the confines" – possible problem with buildings outside this area 	<ul style="list-style-type: none"> - Needs clarification on what this means – what required in an application? - Policy is not specific to heritage so perhaps have two separate policies to enable detailed heritage points to be bought out in clearer fashion?

<ul style="list-style-type: none"> - Inflexible: need new policy to ensure that non-designated, locally listed, heritage buildings, and possibly historic buildings in AONB are covered. Need separate policy to ensure their protection. - “Structurally sound” – what is this definition? Is extent of repair required a consideration in defining “structurally sound”? - Process of conversion can help to stabilise. Perhaps better to define as “capable of conversion without too much rebuild or demolition” - “Adjacent to the confines” – change! - “Suitable character and scale” – is latter word absolutely necessary in policy? - Are defined uses required within policy? - Separate re-use of buildings and conversions into two policies - Definition of the word “re-use”? - Relax planning questions re: use and confines: itemisation – preferred uses in list with best at the top? - Primary focus of policy sustainability not heritage 	<ul style="list-style-type: none"> - Not compliant with NPPF – appropriate areas for conversion - Character is important and is sufficient in policy - Impact of part Q on policy - “appropriate re-use” definition needed - Planning use (optimal viable use) applications versus applications requiring change to fabric of the building.
Policy DM18: River Dour	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Anything to relate to re-opening of river where below ground? EA requirements for opening up river are difficult. - “Wherever possible” - Retain as is but make stronger by including more than setting: “intrinsic value”, “habitat rarity” - More environmental aspects that are in planning 	<ul style="list-style-type: none"> - EA requirements. Increase access aim. Information required so developers know what EA will require - Relocate to end of policy sentence? Enhancement of supporting text may be required to ensure no ambiguity and to enhance the importance of the designation of the River Dour
Policy DM19: Historic Parks and Gardens	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - “Significance” not included in policy – weighing benefit vs. harm - Ensuring which are identified as historic or identify in the preamble - Not NPPF compliant\Potentially too strong wording – too negative - Do we need it? - Wording – wouldn’t expect to give permission for works which would cause harm anyway i.e. “not be given” - Does it add anything to what is in the NPPF? - Policy does not relate to para 197 of the NPPF so is it needed? - Too negative terms 	<ul style="list-style-type: none"> - Not NPPF compliant and need to accept degree of harm to get benefit - Is NPPF sufficient to cover this? Does it cover it well enough? - Word it more positively – relocate the “not” – use wording in NPPF? - Consider rephrasing “not be given” to be more in line with para 197 i.e. introduce term “harm”

Policy DM20: Shop Fronts (Heritage Element)	
Suggested change:	Rationale:
<ul style="list-style-type: none"> - Change of use of shop to residential for example can be problematic with policy re design consideration being included - “Respect the composition” – what does this mean? - Potentially steered too far towards historic buildings and areas - Does policy cause issues with ability for building to change in an appropriate manner if use changes e.g. to residential - DDA compliance – balance between this and policy? - “Respect” (use something more assertive). Proactive wording to allow for change. - Feels static – allow for flexibility. - What is meant by “the building”? Whole building? - Negative phrasing? - Separate/subsection policy to ensure higher bar for CA/LB - Separate heritage policy section 	<ul style="list-style-type: none"> - Separate into two different policies – one specific for heritage? - One general design type policy. - Need for SPD to cover DDA? - “creative, contextual and well designed” could be included in order not to preclude new design? - Could include “character” to cover heritage aspect.
Additional:	
Suggested change:	Rationale:
A1: <ul style="list-style-type: none"> - Non-designated heritage asset – what are these – definition by DDC on what constitutes these? Criteria? - Is there a vacuum where NPPF leaves off that needs to be reflected i.e. Non-designated – para 197 of the NPPF locally listed, archaeology not covered 	
A2: <ul style="list-style-type: none"> - Character based historic design guides – ID signature of character areas 	

Table F: Historic Environment												
Policy	Session			Session			Session			Session		
	1	2	3	1	2	3	1	2	3	1	2	3
	Keep			Delete			Tweak			Major Rewrite		
DM19							✓	✓	✓			
DM20							✓	✓	✓			
DM4							✓	✓				✓
DM18			✓				✓	✓				
A1											✓	

A2												✓
A3												✓

Group F: Overall Observations:

- Broadness of policies is unhelpful!
- Historic environment needs its own section

Key Thoughts on Policies

Individuals were invited to emphasise their personal key thoughts re the policies as follows:

- Policies generally need to be made 'positive' as opposed to restrictive.
- Lack of policies promoting effective use of land (section 11 of NPPF 2018)
 - o Encouraging development of sustainable sites adjoining settlements & transport hubs
 - o Substantial weight given to use of PDL
 - o Upwards extensions and development of under-utilised land
 - o Increasing densities
- Policy supporting renewable energy proposals (akin to Thanet's proposed Local Plan)
- Promoting sustainable rural development
- Overall emphasis on promoting sustainable development
- Policy TR9 – Cycle Paths: This policy should be enhanced in order to do all that is possible to ensure that the infrastructure is improved. More, and better, cycle paths would encourage the use of bicycles in the district which would have environmental and health benefits.
- We encourage you to include an AONB Policy. We are happy to assist in this
- Retain confines for controlling development (housing)
- Use 'building for life' to enhance design quality
- Green infrastructure policy needs to refer to SSSI/RAMSAR etc. if relevant – not just implied!
- Particularly with regards to CP4 potential rewrite & implementation of suggested additional policies 1-6
- DDC need to be careful that in rewriting policies, they do not fall back to prescriptive standards which although may improve quality for some development, hinder others which may have surpassed the standards/or indeed hinder future proofing.
- Consideration of the context IS important, but is a risk that Kent will be frozen in time at the detriment to our built environment.
- If the suggested additional policies 1-6 are going to be introduced – the discussions need to include other professionals/organisations. DDC cannot solely complete this from today's discussions.
- Taking into account that Local Planning Policies (especially) could and are interpreted in a few ways (that is what actually happens in practice), I would STRONGLY encourage Dover District Council to take a practical approach to new and existing policies remembering that almost everything is a question of opinion and that LPP are a tool to improve people's lives and not to giving planning officer's opinions (sometimes personal ones) the chance to prevail.
- Policy CP4: If this is to be expanded into a new suite of policies designed to control Development Design, make sure they are not too prescriptive and will address the actual problems with design in the District that are a result of lack of control under the previous policy. Do not restrict creative design – beware of too prescriptive housing standards and beware of encouraging/restricting designers to simply copying the neighbour's properties.
- Ask good architects to advise on what is good design!

- Policy: Conversion of rural buildings – problems are definition of what is structurally sound. Do not restrict residential conversion to next to confines. Nowhere in Kent is isolated. Ensure policy protects locally important historic architectural buildings that are not listed and are in an AONB i.e. not suitable to Part Q.
- Make a sustainable, healthy environment front and centre
- The plan needs to be driven by the need/aspiration to encourage the right development in the right places and to ensure that poor development doesn't come forward. Policies should be written to ensure that they work for those that use them include both planning officers and developers. Also avoid too many unnecessary policies.
- Traveller sites: Allocated site! Formalise existing allocations and allocate sufficient sites otherwise you have no ground to prevent decisions being allowed on appeal.
- Design – ER6 – needs re-think in line with NPPF
- WE6 – could use a specific geographic reference rather than just “well related to Sandwich”
- DD21 – Cannot control horse – related paraphernalia – not development
- Design – from a designer's perspective: We are employed to design nice things! Our clients are spending 100s of thousands to build things that are attractive/desirable. “Matching” what already exists is not always good design! An example – new house – planning insisted on no integral garage due to design. House sat on the market for over a year – reason for lack of sale was – no garage!
- Infrastructure: Foul water infrastructure needs to be in place before new houses are inhabited. i.e. Whitfield is a good example of tankers pumping out sewage on a regular basis. 6000 new houses infrastructure can't cope, where is fresh water coming from?
- Housing: Improved facilities for electric vehicles and charging points. Provision of broadband allows home working. Therefore, less traffic, improves air quality and congestion
- Policy issues: How to interpret design in interpreting applications? Without repeating the general principles of the NPPF? Need to add something.
- DDC will seek high quality design – but what? Not unnecessarily restrictive, but be able to issue robust refusals based on design reasons and inform the negotiation process as needed.
- Special design policies WILL be useful, and will not only guide applicants on what is acceptable, but help officers and members to determine applications. It would give confidence in refusing applications of a ‘poor design’
- Timetable on website as to where the council is up to!
- Flexibility in policies
- New development = enhancement s/b built in
- Subject areas where policies seem to be lacking or missing:
 - Archaeology
 - Ecology
 - Design – need to establish general principles
 - SUDS
 - Air quality
 - Noise impacts
 - Contamination (land quality)
 - Internal housing space standards
 - Water use/efficiency
 - Incorporation of lifetime standards/adaptability in housing
 - Establishing what infrastructure requirements result from individual developments
- To all policies where the notion of “appearances” needs to be referred to, the default turns of phrase are just those used in “heritage” policy. That restricts new ideas and appearances. Worse still the conversion is historic in nature and probably old-fashioned. Remove all “appearances” in to separate enlightened design policy.
- General need to consolidate policies into a set of core themes:

1. Policy to restrict one-beds in Castle Street (it is flooded with one beds)
2. Folkestone Road is following the trend in Castle Street (needs to be considered)
3. Policy for backland development
4. Policy in relation to two separate schemes brought forward by the same applicant (total of units combined in 2 schemes would require affordable housing). Piecemeal schemes to be restricted.
5. Policy for design of extensions.
 - Develop a local list
 - Historic Environment: Policy DM4 – generally acceptable and helps inform decisions which may be excluded by other housing policies
 - Future-proof housing
 - Healthy homes not just the structure of the property but also the health of the inhabitants.
 - Sustainable/renewable energy sources used in as many properties as possible.
 - Connectivity by sustainable transport between new developments.
 - SPD on design OR link to NPPF design and SPD/guidance referenced in footnote of 127.



Feedback on the Session

Individuals were invited to give feedback on the session, as follows:

- Welcomed the opportunity to have a voice and comment on the local plan, especially given changing climate, energy, security and water scarcity.
- Good opportunity to discuss policy issues with developers, consultants and planners.
- Helpful conversations
- Can the engagement with all levels of officers continue?
- Welcome opportunity to discuss in smaller groups
- Welcome opportunity to continue to engage in process
- Excellent set up and interesting discussions – thank you!



- Very useful format especially working in small groups for discussing topic areas. However, one thing we learnt was that there is lots of crossover between these topic areas and this is one of the “problems” about how the policies need to be re-configured.
- A good session more engaging than similar by other authorities!
- Good to feel part of the early process
- Very happy to continue the process in smaller or topic-specific groups
- Thank you for the invitation. The afternoon has been fun, interesting and hopefully will be very useful for the new local plan.
- Peter is an excellent leader – top job! Venue and food were excellent. All brilliant!
- Informed discussions, worked well
- Very productive meeting. I think everybody wants the same end result.
- Always pleased to be invited to these events and improve communication
- Great to have the opportunity to provide input to these areas
- Good discussions
- Very useful event – good to be engaged at an early process
- Useful and refreshing to be consulted. Please keep up the dialogues. The architects and other professionals are not the enemy – we all want to improve the built environment.
- Very useful and well organised but unfortunate lack of publicity, especially for private practitioners. As it can be seen in the ratio of Dover DC vs. practitioners, there has been little work on it.
- I do think today’s event has been beneficial for all involved. Hopefully this type of conversation will continue.
- Venue has been good for the event, though at times I found it difficult to hear the group conversations within the room.
- Why so many men in these groups?
- Quite a few local agents missing
- Presentation and interaction very good. Venue good.
- Thanks! A very helpful session. I am grateful for being invited.
- Well presented and organised.
- Appears to have been constructive
- A very useful afternoon to assist in planning development of DDC. Great venue.
- Very positive and well-thought out event
- Helpful to understand wide range of views and will positively influence plan
- Keen to see further similar work and wish to see other authorities be as proactive!
- Let other Kent authorities know how useful today was!
- Keep engaging – hopefully will lessen any issues/disagreements later on.