

## **Dover District Local Plan**

### **Housing and Economic Land Availability Assessment**

#### **Note of Key Issues Raised at Meetings with Town and Parish Councillors**

To inform the preparation of the Dover District Local Plan officers have undertaken a Housing and Economic Land Availability Assessment (HELAA). The Housing and Economic Land Availability Assessment aims to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The purpose of the Housing and Economic Land Availability Assessment is to:

1. identify sites and broad locations with potential for development;
2. assess their development potential;
3. assess their suitability for development and the likelihood of development coming forward (the availability and achievability).

The Housing and Economic Land Availability Assessment is a technical piece of evidence to support the Local Plan making process and is a requirement of the National Planning Policy Framework (2019). It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development. The allocation of land for development will depend upon the extent of policy and practical constraints identified in the assessment and the choices ultimately made by the Council taking account of the outcomes of the Sustainability Appraisal and following public consultation on the strategy. Ultimately, it is the role of the Local Plan itself to determine which of those sites identified in the HELAA are the most suitable to be taken forward and allocated for housing.

To inform the local plan making process a number of meetings were held with Town and Parish Council's in March 2020, to discuss the latest findings of the HELAA work. These meetings were an opportunity for town and parish councils to discuss the sites identified with officers and provide feedback.

A note of the issues and actions identified at each of the meetings is provided below. This feedback, in addition to other evidence, will be used to inform the sites that are taken forward in the local plan.

**Tuesday 10<sup>th</sup> March 2020 - Lydden PC, Whitfield PC, Dover TC, River PC, Temple Ewell PC, Guston**

| <b>Attendees</b>       |  |
|------------------------|--|
| Glynis Farthing        | Lydden Parish Council                    |
| Cllr James Back        | Whitfield Ward Council                   |
| Alison Burton          | Dover Town Council                       |
| Cllr Pauline Beresford | River Parish Council                     |
| Cllr David Beaney      | Dover Downs and River Ward Council       |
| Cllr Ruth Horton       | Temple Ewell Parish Council              |
| Cllr Peter Jull        | North Deal Ward Council                  |
| Cllr Nick Kenton       | Portfolio Holder and Eastry Ward Council |
| Lois Jarrett           | Head of Planning                         |
| Rebecca Burden         | Principal Planner                        |
| Richard Thompson       | Principal Infrastructure Planner         |

| <b>Issues Raised</b>  |
|---|
| <p><b><u>Lydden Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>LYD003</b>- Concerns about the accessibility and HGVs going down Church Lane. It was explained that KCC Highways have been consulted in respect of this site and that highways issues could be mitigated via Design at Planning application stage</li> <li>• <b>LYD003</b> - Worried that the houses by the church are set lower. Officers confirmed that this can be mitigated through design and landscape buffering</li> <li>• <b>LYD001</b>- Concerned that this is an odd addition to the Parish. Historically developers have not expressed interest. Cllr Kenton expressed that this site would provide a softer start to the village and any concerns could be mitigated through good design.. Cllr Beany also made suggestion that 30 MPH signs could be placed further up.</li> <li>• The question was raised regarding schools. Cllr Kenton confirmed that KCC Education has been consulted as part of this exercise</li> <li>• Asked if a site could be identified for a playground. Cllr Kenton confirmed that it is the parishes responsibility to identify and purchase land for this purpose.</li> </ul> <p><b><u>Guston Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>GUS001</b> – The identification of this site was questioned. Officers commented that it could be designed to mirror the existing development across the road. It remains Amber due to Highway constraints.</li> <li>• The concern around parking impact and congestion on the Dover Road.</li> </ul> <p><b><u>Whitfield Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>ACTION Requested that we provide Dover and Whitfield maps separately.</b></li> <li>• Dover TC and Whitfield Parish council are supportive of Whitfield expansion however have the following concerns regarding the impact of the site as a whole:</li> <li>• <b>Community infrastructure</b> not being strong enough for proposed new development. Officers confirmed that the developer is currently looking at two key proposals; A new shop and a New Healthcare Provider. In addition to this the new Primary School is due to open this year. Discussion was had around the delay in this, officers responded by explaining that this was due to re negotiations with contractors that is now resolved.</li> </ul> |

- **BRT/Dover Fasttrack** – Parish is very supportive of the BRT however are unsure of the impact it will have on traffic. Officers highlighted that it may be renamed the Dover Fast Track and take influence from the Dartford Fast Track that has been a very successful scheme. The hope is that the BRT will reduce the number of people traveling from Dover to Whitfield and alleviate the pressure on Duke of York roundabout.
- **Highway Improvements** – Officers explained that they are very aware of the issues surrounding the A2 and Sandwich road. Section 106 monies will pay for Highways improvements however a far more drastic approach will need to be taken in the future to prevent the existing issues.
- Comments were made surrounding the lack of delivery at Whitfield. Officer reassured that now that we have larger Developers on site it is likely that we will see the site develop at an accelerated rate.
- **Archers Court Road** - Cllr Back Expressed his concerns. The recently implemented yellow lines have greatly improved the highways situation however there are still a lot of issues around parking on the pavements as the lines are not being enforced. This is a very congested area and the addition of a bus gate for the BRT would intensify issues further.
- **ACTION - LJ to CC Cllr Back in on email to Highways regarding Phase 2 Questions.**
- **ACTION - Officers to share highways plan for Archers Court Road.**
- **Sewage** – The addition of a new attenuation tank in April was good however the pipework up Sandwich road is not big enough. With further houses planned it will not cope with the waste. Officers have confirmed that we are looking at this and Southern Water are fully aware of the situation. Discussions are in progress regarding this issue.
- **Sandwich Road** – It was raised that the access to sandwich road and the requirement to drive to the left is not functional and improvements are required. Cllr Kenton reassured that this would be included within the Masterplan.
- **Napchester Flats** - It is proposed that bollards go up in this area for the BRT. **ACTION to include Cllr Back in future meetings relating to this topic.**

### Dover Town Council

- The Majority of the sites within Dover Town are previously allocated sites within the Core Strategy and Land Allocations Local Plan and Dover TC are supportive of these sites.
- Car Parking was raised as an issue. Dover TC expressed that we should not be removing car parks in the Town Centre and using them for development. Officers responded that studies will be completed to identify car park usage and that many of these sites were previously identified for housing in the Land Allocations Local Plan. The Implementation of the BRT will hopefully also reduce the requirement to drive into town.
- Dover Town Council also commented that they want bigger houses and not “rabbit hutches”. Dover TC feel it is essential to offer off street parking where possible, especially around St Radigunds. Officers commented to say that there will be a mix of housing to cater for a range of housing needs. Officers did reassure that National Space Standards will be considered within the Local Plan.
- **Coombe Valley** – Issues were raised regarding the narrowness of the road through Coombe Valley. It was suggested that a Policy be implemented to remove the light industrial use and move it to Whitfield to provide easier access to lorries, however the it was agreed that the expense of this would be too high. Cllr Kenton did make the suggestion that it would be good to encourage more mixed-use development in this location.
- It was agreed that Dover High Street needed investment / improvement. It was discussed that High Streets such as Deal and Canterbury are focusing on being a destination day out and Dover needs to do the same and consider its role in the District
- **Affordable Homes** - Officers confirmed that there will not be a blanket Policy relating to Affordable Homes, there will be zones to ensure viability and deliverability are considered.
- Cllr Jull commented that he was surprised that a lot of the proposed sites on the BRT route are red. Cllr Kenton responded that these could be reviewed subsequent to BRT implementation.

**Town and Parish Meeting 12<sup>th</sup> of March -Kingsdown with Ringwould PC, Langdon PC, Ripple PC and St Margaret's-at-Cliffe PC**

| <b>Attendees</b>      |  |
|-----------------------|--|
| Clr Martin Bates      | Guston, Kingsdown and St Margaret's at Cliffe Ward Council |
| Clr Oliver Richardson | Guston, Kingsdown and St Margaret's at Cliffe Ward Council |
| Clr Nick Kenton       | Portfolio Holder and Eastry Ward Council                   |
| Clr Mike Eddy         | Ringwould, Kingsdown and Walmer Ward Council               |
| Clr Chris Shaw        | Langdon Parish Council                                     |
| Clr Seb Willett       | Langdon Parish Council                                     |
| Phillip Marsh         | Sholden Parish Council                                     |
| Kevin Lynch           | Sholden Parish Council                                     |
| Clr Chris Turner      | Deal Town Council  |
| Kirsty Holroyd        | Walmer Parish Council                                      |
| Clr Susan Carlyle     | North Deal Ward Council                                    |
| Clr Clr Peter Jull    | North Deal Ward Council                                    |
| Clr Kate Solley       | Great Mongeham Parish Council                              |
| Clr Chris Saville     | Grate Mongeham Parish Council                              |
| Rebecca               | St Margaret's-at-Cliffe Parish Council                     |
| Anna                  | St Margaret's-at-Cliffe Parish Council                     |
| Clr Dan Friend        | Sandwich Town Council                                      |
| Laura Fidler          | Sandwich Town Council                                      |
| Clr Cynthia Charter   | Woodnesborough Parish Council                              |
| Lois Jarrett          | Head of Planning   |
| Richard Thompson      | Principal Infrastructure Planner                           |
| Stuart Watson         | Senior Policy Planner                                      |

| <b>Issues Raised</b>  |
|---|
| <p><b><u>Ringwould Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>RIN002 and RIN004</b> - Some concerns around the number of cars that the development of these sites would generate. Officers confirmed that they have been assessed by KCC Highways in terms of safety. Concerns specifically related to crossing of the A258.</li> <li>• <b>RIN003</b> - Clr Eddy questioned if the Paddock next to RIN003 will remain. Officers confirmed this area was not put forward.</li> <li>• Clr Eddy queried the projection going through Queens Rise. Officers confirmed that this will be made using land currently utilized by garages and will be developed to an adoptable standard.</li> <li>• Clr Jull Questioned why RIN006 had been made red as it is not part of the AONB. Officers confirmed that this is a Green Wedge. Officers also reiterated that the AONB unit and Landscape consultants have physically visited all sites.</li> <li>• Discussion regarding the weight of Highways decisions arouse. Clr Kenton confirmed that Highways advise is taken as a primary consideration and that their refusal of a site would result in it not coming forward. It was reminded that Highways assessments are only responsible for own infrastructure.</li> <li>• Clr Eddy expressed concerns around enhancing Ringwould and that it would be an issue when there are roadworks and could cause accidents. Officers confirmed that Highway safety is always a major consideration however ad hoc road work is an issue regardless of location.</li> </ul> |

### Kingsdown Parish Council

- **KIN002** - The Parish Council questioned the land at Woodhill farm - officer confirmed that there are various technical issues in relation to this site - access would need to be achieved via third party land. It is up to the Landowner to establish this access point.

### Langdon Parish Council

- Cllr Willett disclosed that they are considering joining with St Margaret's and Guston to produce a Neighborhood Development Plan.
- **Affordable housing** - General discussion was had amongst the group to define Affordable housing. Officers confirmed that affordable housing comes in a variety of forms and is less than market value. It was confirmed that the Local Plan will look to define rural affordable housing due to the demand of people looking to remain in the villages they have always lived in. Officers also confirmed that Developments of more than 10 house require affordable housing.
- **Growth Options** - Cllr Willett asked if we are in line with our Growth Options. Officers responded that our original Core Strategy focused most growth in Dover Town, however given that strategy hasn't worked for a number of reasons officers have had to look at other strategies. Part of this is looking at whether rural areas can accommodate more growth to support their services. Cllrs asked why a pro rater strategy is not adopted, Officers responded that although this is a good approach in theory it is not practical as we need to also consider sustainability within the three core towns (Sandwich, Deal and Dover)
- **Schools** - It was raised that the existing Local Plan references School capacity and will this be a consideration? Officers confirmed that we work closely with KCC as the education authority.

### St Margaret's -at-Cliffe Parish Council

- **STM003** - Questions were raised as to why only part of STM003 is identified. Officers informed that part of the allocation would impact on the AONB however the other part can be well contained using hedge rows. It may be considered that this site is put forward for executive homes that provide fewer but larger dwellings.
- **STM007 and STM008** - Amber due to access issues, will be up to the site promoter to specify access point.
- **STM010 and STM011** - Are on unadopted roads maintained by residents. Cllr Kenton confirmed that access arrangements would need to be considered in greater detail at the planning application stage.
- **STM009** - Was questioned but confirmed that site was removed as situated in the AONB

### Great Mongeham Parish Council

- **GTM003** - Cllr Eddy stated that this is a scheduled monument. Cllr Jull believes that it is rubble from bomb damage. **ACTION - Officers to confirm**
- **ACTION – Turn GTM006 Blue as existing Allocation**
- **GTM009** - Existing farm building discussed as can be altered under permitted development rights. Questioned why we are concerned if this can happen anyway. Officers confirmed the PD only allows for development within in the existing frame of the farmhouse and not for a major development to take place.
- Mongeham Parish Council happy with all proposals.

### Deal Town Council

- **DEA018** - Cllrs believe that DEA018 is in Sholden and not Deal - **ACTION for officers to investigate.**
- **DEA008** – Very contentious site. Officers confirmed that as part of the technical HELAA exercise, it has been deemed as suitable. It will remain green throughout planning process as the committee process that

is running simultaneously is separate to this process. It will only go red if refused at appeal. If it is approved at committee it will go blue.

- **DEA021** Falls within settlement confines but is un-accessible Open Space. If allocated a piece of Open Space equal to this would be identified elsewhere.

#### Sholden Parish Council

- **SHO002 & SHO004** - Required to come forward together, SHO004 is at committee this evening. Officers confirmed that this is a separate process and SHO004 will remain a green HELAA Site.
- Sholden Fields residents are concerned that having recently purchased property with a view this will now be removed.
- It was raised that there was a lot of red sites throughout the Deal and Sholden areas. Officers explained that this is primarily due to Level 3 flood risk and highways capacity issues.

#### Walmer Parish Council

- **WAL002** - Cllr Eddy raised that WAL002 would need consideration in respect to accessibility.

#### Sandwich Town Council

- **SAN015** - Kumar Nursery – is being discussed tonight as Sandwich TC have made their position clear that they strongly object to this site however appreciate that it has been accepted as part of the technical HELAA Assessment
- **SAN019** - Considered to be well connected and not a concern for Highways. Landowner is keen to bring forward and will put forward as a G&T site if not supported for housing.
- Cllr Friend stated that Sandwich recognise the need for housing however the infrastructure is not capable. There are major issues with parked cars and prams at school time. Suggested that we connect sites to create a new access to sandwich however SAN015 is unavailable. Conflicting conversations between Cllr Kenton and Landowner Mr. Bean and Cllr Friend and Mr Bean. **ACTION Clarification required on Mr. Beans Position. Suggestion from Cllr Friend is that we speak to Richard Door**
- Flooding is major issue throughout Sandwich. KCC Depot is slight exception due to it being a Brownfield site and the EA will allow for existing sites to be improved upon in terms of flood risk. EA prefer Commercial over Residential as the risk to life is reduced.
- Cllr Friend expressed that the Public will not be happy about **SAN015**

#### Woodnesborough Parish Council

- **WOO006** - It was raised that there will be a lot of objections around WOO006 due to the view. Lois Jarrett confirmed that this was a previous allocation however members swapped it around previously in order to allocate the Town Hall. Cllr Charter commented that parking would be essential on this site. Officers confirmed that it is likely that we would mirror the development opposite which included off street parking.
- **WOO007** – Comment raised that this is currently a 60MPH zone moving to a 30MPH zone. The 30MPH has already been moved up however it would be good to increase the 30MPH zone if development took place.
- **WOO007** - Some concerns around flooding. Officers reassured that that this would be considered.

**Town and Parish Meeting Tuesday 17<sup>th</sup> March 2020 – Aylesham, Nonnington, Eythorne, Shepherdswell with Coldred, Ash, Goodnestone, Preston, Staple, Wingham.**

| <b>Attendees</b>      |   |
|-----------------------|---|
| Suzanne Collins       | Eythorne Parish Council                   |
| Cllr Charles Woodgate | Aylesham and Shepherdswell Ward           |
| Cllr Paulette Butcher | Eythorne Parish Council                   |
| Cllr Marien Elgar     | Shepherdswell With Coldred Parish Council |
| Cllr Keith            | Shepherdswell With Coldred Parish Council |
| Sharon Addis          | Wingham Parish Council                    |
| Christine Haggart     | Ash Parish Council                        |
| Cllr Nick Kenton      | Portfolio Holder and Eastry Ward Council  |
| Stuart Watson         | Senior Policy Planner                     |
| Corin Bengel          | Technical Officer                         |

| <b>Issues Raised</b>  |
|---|
| <p><b><u>Aylesham Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>AYL005</b> – Cllr Kenton raised that there could be landscape issues.</li> <li>• <b>AYL003</b> – Cllr Woodgate raised that this would have landscape impacts and would spoil the views and visual impact of the Village. Cllr Kenton reassured that it will be important that any development is softened, and impact mitigated using tree planting and design. Developers will be required to put a sensitive design forward that incorporates this.</li> <li>• <b>AYL003</b> – Cllr Jull feels that the boundary is incorrect. Officers confirmed that at Reg 18 we will ensure these are correct and site promoters will be required to submit exact plans. <b>ACTION - Officers to check boundary.</b></li> <li>• <b>AYL002, AYL001</b>– No Comments</li> <li>• <b>AYL004</b> – Cllr Woodgate feels that this would be a logical expansion.</li> </ul> <p><b><u>Nonnington Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• No comments – Satisfied with sites.</li> </ul> <p><b><u>Eythorne Parish Council</u></b></p> <ul style="list-style-type: none"> <li>• <b>EYT006</b> - Flooding issues highlighted.</li> <li>• <b>EYT003 &amp; EYT009</b> - Concerns around Miners Trial – Cllr Kenton Reassured that public rights of way must be preserved and will be landscaped.</li> <li>• <b>Cllr Jull</b> asked if EYT014 (which is currently red) could be used as access to EYT003 and EYT009. Cllr Kenton confirmed that you don't want sites that rely on other sites to come forward as that is how ransom strips are created. If EYT003, EYT009 and EYT014 all come forward it can be a discussion. Parish feel that an alternative to existing access plan would be good as the current crossing of Adelaide road is dangerous due to the speed of the road. Officers confirmed that KCC have deemed this access acceptable. It is paramount for KCC to consider safety.</li> </ul> |

### Shepherdswell with Coldred Parish Council

- **SHE002** - Has Planning Permission. **ACTION - Make Blue**. Some concerns around access to Mill Lane. Officers confirmed that this will need to be a high-quality design with buffers and mitigation required. It is a challenging site due to heritage impacts.
- **SHE008** – **ACTION move label and check boundary**.
- **SHE004** – Only part of the land is coming forward due to the impact on North Downs Way. Questions were raised if this will be in keeping with existing development. Cllr Kenton feels that it should be designed to mirror existing development. Comments encouraged at Reg 18.
- **SHE006** – Extension to existing development. Community Let Trust Housing application is to be submitted soon. Highways feel that existing road infrastructure is adequate - concern is that Highways are not considering the cumulative impact of sites.
- **SHE003** – KCC have concerns around access and Parish Council agree. Officers aware of this.
- **SHE003** - Cllr Jull questioned that this site is not well connected to the train station. It is over a mile with no streetlights or pavements.
- **SHE004** - The Parish is very happy that the proposal has now been reduced in size.
- **SHE006** - Concerns around sewage along the valley. Officer reassured that Building Regulations would assess this at planning application stage
- Parish is concerned about the amount of development identified in Elvington and whether this would impact on Shepherdswell parish.
- In conclusion Shepherdswell feel that they do need additional housing but need improvements made to the infrastructure in order to support it. They feel that additional development could result in the roads becoming dangerous. Cllr Kenton acknowledged this but stressed that it is difficult to drastically improve road infrastructure without the quantum of development.

### Ash Parish Council

- **ASH010** – Heritage concerns would need to be mitigated as there is a Grade 2 listed building. There is currently a Planning Application in, awaiting timescales.
- **ASH014** – Parish believes that this is now available and developers are ready to go. Officers believe this may only be part of the site **ACTION - Officers to confirm**.
- **ASH015** – From previous LLAP – Alternative arrangements would need to be made for the Scout Hut. The original policy does include this and would like the new policy to state that we would be required to deliver a site suitable for the Scout Hut or to provide an alternative.
- **ASH004** – Within Ash NDP Draft Plan. Would consider adding another access road. The Western Boundary is a Public Bridal Way, historically this did cross the A257. Ash would like to consider this again. Cllr Kenton informed that KCC are very much against new accesses onto fast moving roads.
- **ASH011** – Feels that this site is fine on its own but contributes to the cumulative impact on the roads if ASH004 and ASH005 also come forward. The difficulty is that Molland Lane to Guilton is single lane due to parked cars.
- Question was raised if the assessment criteria is different to the NDP Assessment. **ACTION Officers to check**.

### Wingham Parish Council

- **WIN003** - Low density extension to existing affordable homes development. Anticipated to be 20 units or less. Speed survey would be needed as well as minor widening. Parish raised that there are frequent collisions along Staple Road, and it has become increasingly dangerous since the Aylesham Development.
- **WIN14** – Concerned that this will add to the Cumulative Highway Impact. Cllr Kenton reassured that this would be a low density development but welcomes comments as part of Reg 18

- **WIN006** – Would require highway mitigation, lots of large vehicles use this road and not suitable for pedestrians.
- **WIN004** – Has previously had Planning Permission for 4 Dwellings.
- Red sites challenged – Primary reason for unsuitability is due to Flood Zone 3
- The Main concern for Wingham Parish Council is traffic constraints on junctions joining the Highstreet.

**Staple Parish Council (Not in attendance)**

- **Action STA001 – Needs to go Blue as now has Planning Permission.**
- **Action STA009 – Needs to go Blue as now has Planning Permission**
- Officers discussed the need for another call for sites alongside the regulation 18 consultation to allow new available land to come forward for consideration. The call for sites will also prescribe certain types of sites the Council require for consideration to meet national policy requirements.

**Town and Parish Meeting Thursday 19<sup>th</sup> March 2020 – Alkham, Caple Le Ferne, West Hougham, Eastry, Northbourne, Sutton (East Studdal), Tilmanstone, Worth**

| <b>Attendees</b> |                                |
|------------------|--------------------------------|
| Cathy Skinner    | Northbourne Parish Council     |
| Mog Ovenden      | Tilmanstone Parish Council     |
| John Hudson      | Tilmanstone Parish Council     |
| Jo Mott          | Worth Parish Council           |
| Mark Jones       | Eastry Parish Council          |
| Cllr Kenton      | Eastry Rural Ward              |
| Cllr Jull        | North Deal                     |
| Rebecca Burden   | Principal Planning Officer DDC |
| Stuart Watson    | Senior Planning Officer DDC    |
| Corin Bengel     | Technical Officer DDC          |

**Issues Raised**

**Alkham Parish Council ( Not in Attendance)**

- Surface water flooding issues on ALK004 were discussed, as were landscape impact of ALK003 and ALK004.

**Northbourne Parish Council**

- **NOR005** – Officers reassured that this would be a Mixed used development with mitigation for the wetlands. If brought forward the site promoter would need to integrate landscape into the design, and it would be a low-density development. Some concerns regarding highways and the overall highways impact of this development. Officers confirmed this will be tested through highways modelling work.
- Cllr Jull Raised that the Chamber of Commerce will Object to this site being converted from an allocated employment site to a mixed-use development. Officers confirmed that this has been allocated employment land for a long time and hasn't come forward. There is also currently an over supply of allocated land for employment.

- **NOR002 & NOR005** - Cllr Jull asked if access to NOR002 could be obtained via NOR005, Cllr Kenton confirmed that if both sites came forward this could be investigated and we would always encourage Land Owners to work together.
- Conclusion that the Northbourne Community are likely to be unsupportive of NOR002 and NOR005 however can appreciate why they have come forward as they are Brownfield Sites.

#### Tilmanstone Parish Council

- **TIL002** - Currently being sold for the keeping of horses.
- **TIL001** - Cllr Ovenden doesn't think that this is in single ownership and that the Pub and the land adjacent are separate **ACTION - Officers to confirm this via Land Registry.**
- Concerns raised regarding Cesspools to support TIL001. Officers confirmed this would be covered as part of Building Regulations.
- Whitfield Urban expansion falls across parish boundaries. **ACTION for officers to send Whitfield Maps.**
- Cllr Ovenden asked if smaller developments will be considered. Officers confirmed that they still envisage a portion of the overall housing supply in the district to be made up of smaller windfall developments, as past evidence suggests. Cllr Ovenden also asked if Policies around AONB would be relaxed. Officers confirmed that they will not.

#### Worth Parish Council

- **WOR009** - The Parish believes this may be in separate Ownership – **ACTION Officers to confirm.** Feels it is a logical site as currently scrub.
- **WOR007** - Currently allocated as Open Space within the worth NDP however appreciate that this has not been turned into valuable Open Space to date. This is in public ownership.
- **WOR006** – feels this is a very logical infill.
- Major concern for Worth is sewage - Officers confirmed that we have been consulting with Southern Water and they are fully aware of sites and will be involved in the process.
- Worth have been discussing the refresh of the NDP but nobody has come forward to do it.

#### Eastry Parish Council

- Cllr Jull has raised concerns regarding the narrowing of Gore Lane. This is mentioned within KCC comments. Officers confirmed that this would be looked at as part of any future planning application on the site.
- **EAS004** – Parish believes that there may already be a planning permission on this site **ACTION - Officers to check.**
- **EAS0012** – Concerns around additional cumulative impact on roads in addition to EAS008. Officers confirmed that KCC Highways have been consulted on this and this will be looked at as part of the highways modelling work.
- **EAS004, EAS009 and EAS007** - all acceptable sites
- **EAS002** – Asked if access could be gained avoiding the Highstreet? Concern around landscape impact of developing the whole site. Would require landscape mitigation.
- **EAS012** - Suggestion made for any undeveloped parts of EAS12 to be used for Open Space as having a smaller development could ease highway impact.

### **Actions for Officers following Meetings**

|                | <b>Summary of follow up actions</b>                                    |
|----------------|--|
| Whitfield      | Provide Dover and Whitfield maps separately.                           |
| Whitfield      | LJ to CC Cllr Back in on email to Highways regarding Phase 2 Questions |
| Whitfield      | Officers to share highway plan for Archers Court Road                  |
| Whitfield      | To include Cllr Back in any meetings related to Napchester Flats       |
| Great Mongeham | Confirm if GTM003 is a scheduled monument                              |
| Great Mongeham | GTM006 – Change to blue as an existing Allocation                      |
| Deal           | DEA018 - Check if this should be within Sholden                        |
| Sandwich       | SAN015 – Clarification needed on Mr Beans Position                     |
| Aylesham       | AY003 – Check Boundary   |
| Shepherdswell  | SHE002 – Now has Planning Permission - Make Blue                       |
| Shepherdswell  | SHE008 – Move label so that boundary is viable                         |
| Staple         | STA001 – Needs to go Blue as now has Planning Permission               |
| Staple         | STA009 – Needs to go Blue as now has Planning Permission               |
| Tilmanstone    | TIL001 – Confirm if sole or separate ownership                         |
| Tilmanstone    | Send Tilmanstone Whitfield Maps  |
| Worth          | WOR009 – Confirm if sole or separate ownership                         |
| Eastry         | Remove comments regarding the Narrowing of Gore Lane                   |
| Eastry         | EAS004 - Check if any of this site has planning permission             |

### **APPENDIX: Comments following meetings:**

#### **Cllr Jull made the below additional comments by email on the 20/03/2020 –**

I am still seriously concerned about the proliferation of private roads in the District and the onerous contingent liabilities new house owners incur and the charges made by exploitative management companies which can become contentious in future years. I would propose that the Regulation 18 consultation contains a draft policy that the council will serve an Advance Payment Code notice under Sections 219 – 225 of The Highways Act 1980 on all new developments of more than 5 dwellings which takes away the choice of a developer keeping roads private. Doing so at this stage will allow interested parties the fullest opportunity to comment before such a policy is adopted or not.

Having now seen & heard the reasoning behind the RAG ratings I'd like to add additional comments to encourage some minor changes before the site allocations are included in the Reg 18 consultation.

- GTM009 All this site is contributing to the conservation area at the moment is a rapidly rusting Dutch barn, collapsed wall, wonky Heras fencing and progressively dilapidating disused buildings. The safest future for the listed barn is conversion to residential use as has happened to so many others. Demolition of the other buildings and replacement with sympathetically designed dwellings can only enhance the conservation area and not detract from it. The newly built grain store can remain red but the rest should be promoted to amber conditional on any development being designed to enhance or not detract from the conservation area.
- GTM003, 004 & 011 The landowner of 003 will not build out a continuous frontage along Northbourne Road as officers are suggesting because it will landlock the rest of his land

against all future uses. The need to respect the setting of the listed farmhouse is recognised but the northwest end of the area currently red can have no impact being unsighted. Apart from the farmer in his field the only public viewpoint is from a small area of Beacon Hill from where the difference in landscape impact between building on the green area only and the whole area will be minimal. If the Part Q application for 011 is built out we will be stuck with a 3 storey tin shed clearly impacting detrimentally on the setting of the farmhouse. If demolition were permitted and replacement with 2 storey dwellings, once the planning application for the farmyard is implemented they will be unsighted behind the barn which is currently a pile of collapsed timber and was never listed in its own right. If conversion proceeds access will be via Pixwell Lane joining Cherry Lane just where regularly parked cars already make passage difficult. 003 & 004 are in the same ownership and open space requirement for 003 could be met on 004. Cars already park on the land so with access to that open space provided by some formalised parking spaces traffic flow in Cherry Lane could be improved. Mongeham is not particularly linear in character. Ashton Close, Dairy Mews, Mongeham Church Close, Church Path, soon to be Stalco and many individual houses are set back behind buildings on the principle roads already. Allowing non-frontage houses on 003 would only be obvious on a map and barely perceptible to users of existing roads. 003 & 011 should be changed back to amber as they were originally.

- AYL003 Any argument for not aligning the boundary between green & red with the council boundary to allow for significant screening is misplaced. The only point on the North Downs Way where part of the site is visible is coming out of the woods north of Woollage Village. But because of the slope of the land the only part that would be seen is the northeast corner which no amount of screening could hide. The other less significant footpaths in the area all lead into the development area anyway so screening would be of lower value. On other sites where screening is expected it is to be provided within the green areas. The only rationale for the red/green boundary at the southern end is a misunderstanding as to the nature of a line on the map which is where the farmer habitually reinstates a footpath across an arable field in the wrong place according to the KCC definitive map. The logical alignment is from the corner of Snowdown recreation ground to the corner of Ackholt Wood. When Aylesham's settlement boundary is revised it should include the scrubby field that cuts the NE corner out of 003 so that it can be brought forward in the plan period if available.

**CLlr Mike Eddy Made the below comments via email on 27/03/2020 on Behalf of Walmer Parish Council.**

- Within the Parish of Walmer  
The Council would be opposed to the development of both sites (WAL0001 (blue) and WAL0002 (orange) indicated on the draft map as they lie either side of a biodiversity corridor which runs from Oxney Bottom and the National Trust land to the south of Oxney all the way through to the paddock north of Walmer Castle. The Council would also oppose both sites because of the adverse impact of development on the road network and on the landscape, particularly the setting of the common in Walmer PC's ownership. These sites are not sustainable environmentally, economically or socially.
- Outside the Parish  
The Council maintains its opposition to the development of land at Cross Road, Deal (shown in green DEA00005) as this will put excessive strain on the local road system within the Deal

TC area and the Walmer PC area. Development will also have a serious adverse impact on the landscape, the aquifer and water flow within the valley. The Council is opposed to the development of the areas marked in red (DEA010 & DEA017) between the Cross Road site and the village of Great Mongeham. These sites are not sustainable environmentally, economically or socially.

**Kevin Lynch, Clerk to Sholden Parish Council, submitted the below comments via email on the 27/03/2020 on behalf of the Parish -**

SHO004 has now been granted planning permission and so that should be blue hatch (Site with Planning Consent). B. SHO001 appears to show an access road from the Churchfield Farm proposed development onto The Street. SPC is not aware that this access road was agreed. To the contrary, SPC believes it is not part of the planning permission. If it is showing an access road, it should be removed. C. Most of SHO002 is above the blue dotted line which we are assuming is the ward boundary (see more below) and thus should that not have DEA prefix. It would appear to be in Mill Hill Ward of Deal Town Council. D. As discussed at the 14 March briefing meeting, it is our understanding that DEA018 is in Sholden Parish. It is also the subject of a planning application (see paragraph 2 below). DEA012 is also in Sholden Parish. SPC believes that the confusion may lie in

the fact that Sholden Parish now has three wards and the map is based on the boundaries of those wards rather than the parish boundaries. Might it be possible to overlay the map with Parish boundaries? Or better still, as it is Town and Parish Councils who are statutory consultees on planning applications in their districts, just produce the Local Plan map based on Town Council and Parish boundaries (removing the Ward boundaries)? More than one of us here at Sholden Parish Council is confused! E. SPC is concerned about the "No hatch" HELAA\_Availability\_Assessment. We would be grateful for more clarity on this. As presented, our understanding is that although there has been no formal HELAA consultation with landowners, professional consultees (e.g. KCC (Highways)) that land will be included in the Local Plan as being within the confines for development. If that is the case, that is quite significant and that should be made clear in any public consultation/documentation. Apologies if this is already in hand. To reinforce this point, the map(s) need to make clear which non-built up/rural sites are unavailable. As it stands, SPC cannot imagine that, in the next 20 years, the Royal Cinque Ports Golf Club will be developed. General

2. SPC thinks that any land that is the subject of an outstanding planning application (such as DEA018) should be clearly identified as such. This could be done, no matter the RAG rating, perhaps by just an asterisk indicating that there is an outstanding planning application. We believe this will give greater clarity to everyone, rather than, at the moment, giving the impression that development will go ahead.

3. Cllr Kenton, at the 14 March briefing, agreed that the Red, Amber, Green reasoning for those ratings would be put in the public domain. This will greatly assist SPC in its formal deliberations on those parts of the Local Plan in Sholden Parish.

4. In addition, again in the interests of transparency (but within GDPR), it would be helpful to have, in the public domain, the DDC HELAA outgoing correspondence with landowners, developer etc. and their replies. In addition, the responses from professional consultees (such as KCC Highways) should also be in the public domain. As above, apologies if this is already in hand. We look forward to seeing that documentation. This is particularly important for SHO002 – the same site divided by Red and Green ratings. And there is land bordering the red SHO002 (GTM005) with planning consent – odd?

5. On a wider note, I think all of us involved in the evolution of the Local Plan are at the mercy of the government proposed White Paper on Planning. It was supposed to issue in the Spring, but we can expect that to be delayed. It will probably come out alongside the Spending Review. Nevertheless, part of the thinking behind the White Paper is that development should take place in or near urban areas, it should introduce new rules on building upwards and have an infrastructure-first approach to building new homes (so that new developments do not put strain on local services). If all that happens, one would expect the Inspectorate review to ensure that those policies are reflected in any local Plan.

**Karry Coltham, Clerk to Wingham Parish Council, Submitted the below via email on 26/03/2020 on behalf of the Parish -**

HELAA SITES – WINGHAM PARISH COUNCIL ‘INFORMAL’ RESPONSE

Wingham Parish Councillors were pleased to note that DDC have been considerate in selecting the number of sites deemed to be suitable for development in Wingham. However, Councillors are concerned about the impact of additional traffic from any future development in the area, contributing to congestion in the village particularly along the Adisham Road to Red Lion Corner where there are existing issues at the B2046/Staple Road and B2046/A257 junctions. Other comments are summarised in the table below:-

|   |  |
|---|--|
| <b>RED SITES: WIN001; 002; 005; 007; 008; 009; 010; 011; 012; 013; 015</b>  |  |
| General Comment: The council are not commenting on individual 'red' sites as it was made clear at the Local Plan meeting attended by Cllr Addis that these sites will not be considered and the landowners will not be able to put them forward even if there is a new call for land in the next few years.                                   |  |
| <b>AMBER SITES: WIN006</b>  |  |
| WIN006  | Wingham Parish Council's objection to this site being developed is well documented and our stance has not changed.   |
| <b>GREEN SITES: WIN003; 004; 014</b>  |  |
| General Comment: Any development must have suitable infrastructure put in place, including any road modification required to mitigate congestion and safety issues. Councillors also request that serious consideration be given to the type of housing required in the village, which should be low cost housing and more rental properties. |  |
| WIN003  | This site is currently outside the village confines. Councillors are concerned the character of Dambridge as a hamlet, which is a feature of the settlements around the village, will be lost. The new 'Saxon Manor' development adjacent to site WIN003 met with serious objection from residents living in the immediate vicinity. Consideration for appropriate and safe access to this proposed site to maintain sight-lines is essential. |
| WIN004  | Councillors feel this proposed site should not be overdeveloped, no more than four properties.   |

|        |   |
|--------|---|
| WIN014 | At least part of this proposed site was due to be the second phase of Rural Exception Site Affordable Housing in Wingham, following the success of Miller Close, but did not get through the Planning process. Whilst the Council supports development here, it must be for low-cost housing, and with the proviso that appropriate infrastructure is put in place. A development of the size proposed would create many extra vehicle movements during construction and on completion and Councillors are very concerned about the impact on our already congested junctions in the vicinity. The junction known as 'Seath's Corner', where Staple Road meets the B2046, has well documented issues with accidents and damage to property from large vehicles using this junction. |
|--------|---|

**Eythorne Parish Council Made the below comments via email on 27/03/2020**

There are 426 proposed houses on the green sites alone, which is considered excessive. There are 305 houses on the amber sites which could be included. The cumulative effect on the existing infrastructure is not viable in our rural position.

Planning policies state that poorer quantity land should be used first. Much of the land included in this suitability assessment is grade 1, best and most versatile land, it should not be used. Building on this land would be contrary to policy CO8 of the Dover District Local Plan, this aims to prevent developments that would adversely affect the character and appearance of the countryside.

In the previous Land Allocations document adopted in 2015, there were only 2 sites in the local plan; Sweetbriar Lane in Elvington was allocated 50 dwellings and Homeside in Eythorne was allocated 25, neither have been developed.

Facilities in the Parish have diminished, there are now 2 churches, 1 school, no medical facilities, less frequent bus services which means shift and night workers cannot use public transport and no mainline station (this was included in previous documentation as an asset), traffic has increased.

The reasons that EYT001 on Monkton Court Lane was dismissed on appeal to the planning inspectorate are still relevant for this site and some of the others included for development:

- The site is poorly served by local services, requiring residents to travel to larger towns.
- The site fails to fulfil the social role of planning as routes are via pathless and unlit country roads. It fails to protect or enhance the natural, built and historic environment.
- Building on this site would result in harm to the character and appearance of the area and result in erosion of the countryside.

Access from EY003, EY009 and EY012 proposed sites onto Adelaide Road and then down Church Hill to Whitehorse junction is not acceptable. Levels of traffic and speed of traffic already using this route are highly dangerous for pedestrians; including primary and pre-school children and their parents using the school. There is also a very sharp blind bend onto Church Hill right outside the school. The increase in traffic from the proposed development would make the road highly dangerous and totally unsuitable for a village road. There is an active Speed Watch group in the parish who have data on the speeds of vehicles using these roads.

The level of proposed development including the amber sites of EY002, EY004 and EY015 must include a new direct access road infrastructure plan to the A2 or the A259. The plans do not appear to take into account the small country roads, the massive increase of traffic with no means of

managing it to the detriment of all residents. As it stands vehicles will use rural roads into neighbouring Parishes to gain access to the A roads.

On the positive side, EYT019 would be a sensible site to develop along with other land already owned by DDC.

**Kate Razzell, Clerk to Aylesham Parish Council, sent the below comments via email on 27/03/2020 on behalf of the Parish.**

- 1) We are surprised at the amount of land indicated as Amber on the map that can be considered for future development. This includes the farm fields to the North of the present development and the farm fields that run along Spinney Lane to Cooting Road and down towards Snowdown.
  
- 2) If these areas are designated for future development then the size of Aylesham will be effectively double what it is now. The village has been developed and is continuing to be developed at a rate that almost doubles the original village now.
  
- 3) The potential increase in the size of the village and the resultant population growth will exceed the primary school provision. It will place a strain on the limited number of retail outlets which will see much of the potential revenue being spent outside of the village.
  
- 4) There will be an increase in road traffic in and out of the village and also within the village itself. The present roadways leading to and from Aylesham will need to be upgraded to wider roads to accommodate the traffic increase.
  
- 5) With the limited amount of off road free parking available at and around the Market Square this will be problematic. In addition there is the ongoing problem with the provision of buses in the village as a whole and in particular the lack of buses serving the existing new builds.
  
- 6) If any further development of the village is considered then much thought must be given to the provision of a large supermarket, petrol station as well as a Pub/Restaurant.
  
- 7) With the potential increase in the population as a result of the areas indicated as being for future development we have the issue of the railway line having an increase in passenger demand. This will not only be for commuting times but throughout the day. Therefore the railway will need to be encouraged to up the level of service at Aylesham.
  
- 8) The level of potential development and resultant increase in the size of the village and population of Aylesham will put pressure on us to becoming a town. This in turn may well require the Parish Council to become the Town Council of Aylesham and will need to take on and provide services for the residents.
  
- 9) In essence these are factors and features of any future planning application that will need to be carefully and thoroughly looked at by the Parish Council and the Planning department of DDC.
  
- 10) The existing infrastructure in the village is already stretched and any sizeable, additional development would be problematic without improvements.
  
- 11) In addition, there is a constant battle to retain green spaces in and around the village so taking up these fields (north and south) would severely hinder this. So too would taking up green spaces within the village (land off Dorman Ave N behind Attlee Ave for example).

**John Hudson from Tilmanstone Parish Council sent them below comments via email on the 26/03/2020**

I was made aware several years ago about the applications of WHI001 and WHI003.

All these parcels of land are within the Tilmanstone Parish boundary.

There are several concerns that would need to be looked into further for these sites related to access, visibility splays, and ransome strips that could potentially prevent development.

I will wait for public consultation before making any specific comments.

**ClIr Turner sent the below comments by email on 26/03/2020 on Behalf of Deal Town Council**

DEA018 No objection

DEA021 (Land off Freeman's Way) Currently under consideration for a planning application; DTC has currently raised no objection to that application.

DEA020 (Cross Road) DTC is currently objecting to the planning application for that land. DDC's decision is currently deferred for further reports. Unless the infrastructure issues can be resolved (access roads), DTC Planning is likely to continue to object to applications to develop that land.

DEA008 (The other side of Cross Road) There is a history of opposing development on this land. Infrastructure issues will apply here as much as for DEA020. There is also the matter of water drainage and the aquifer.

DEA020 and DEA008 highlight the need for a coordinated infrastructure plan for Deal.

Apart from the highways issues, schools, doctors' surgeries, and affordable/social housing are all matters that are regularly cited by objectors to large scale developments.

To assuage the objections of the citizens of Deal, we will need guarantees that, in particular, Section 106 money is earmarked for local needs. In addition, there is the issue of recruiting people – doctors, dentists, teachers – to this part of Kent. Surgeries and schools can be built, but we need a plan to attract the people to work in them. DDC (and KCC?) should lead on recruitment by providing suitable inducements.

There needs to be coordinated action to require development to be sustainable and carbon-neutral, in line with the declaration by DTC of a climate and environmental emergency.

**St Margaret's Parish Council sent the below comments via email on 26/03/2020**

- (STM010 + STM011) Salisbury Road/The Droveway (amber) – site is at the end of unadopted roads; in AONB; would any provision be made for affordable housing; problems experienced in locale of water run-off; likely to be an historical site re archaeology.
- (STM003) Reach Road – probably the “best option” for any development.
- (STM007 + STM008) Dover Road/Ash Grove – access road may be required given size of proposed development; likely to be site of Saxon burials.

- (STM006) – Station Road/Townsend Farm – DDC had suggested “executive style” houses for this site – not in keeping with local houses, necessity is for smaller affordable homes. Site adjacent to AONB.

**Sutton Parish Council sent the below comments via email on 26/03/2020**

The Parish Council's planning policy is enshrined in our Village Design Statement which was completed and adopted in 2007. Due to the changes we have seen since then it has been necessary to update the policy. We are currently coming to the end of this process following public meetings and consultation. The policy is the work of a community led group independent of the Parish Council. So far the Council have not adopted the policy due to time pressure and the responses being collated. The main changes involve adding detail (a time consuming task) and modernising policy on larger developments and traffic management. Work has stopped now due to the current circumstances.

The Parish Council have had sight of the current HELAA assessment. Normal procedure would be to visit the sites, talk to affected residents, carry out consultation and public meetings. We followed through on this process in 2010 during the last call for development land. Unfortunately, at present we are not able to visit the sites due to government restrictions. We are not able to meet with affected residents. We are not able to hold meetings public or otherwise. We are not able to carry out consultations. Sutton Parish Council would respectfully ask the District Council to suspend the current process so that the full democratic process can take its course once the threat of Coronavirus has been controlled.

**Ash Parish Council Submitted the below comments by email on 27/03/2020**

| ASH NDP Group comments on DDC Assessment of HELAA Suitability Assessment March 2020 |              |                      |  |  |
|---|--------------|----------------------|--|--|
| Site Ref  | DDC Category | Allocated in Ash NDP | ASH NDP Group Comments   | Notes on DDC Meeting 17 March 2020   |
| ASH001<br>Land to the south of the A257 (HELAA 31)                                  | Red          | No                   | Agree  |  |
| ASH002<br>Land at the end of Langdon Avenue (HELAA 32)                              | Red          | No                   | Agree  |  |
| ASH003<br>Site at Millfield (HELAA45)   | Green        | Yes                  | Agree Ash NDP Policy ANP7c   | It is noted that KCC has concerns on the highway impact from this development. The adjacent developments have been carried out so as to enable good highway access to this site. The proposed mitigation for this site in ANP7c would reduce the number of units from 12 to 9. The cumulative impact on New Street from this number is not seen to be a traffic safety issue at the access / entrance point to New Street. |
| ASH004<br>Land north of Molland Lane (HELAA 95 )                                    | Green        | Yes                  | Agree Ash NDP Policy ANP7d   | It is noted that access is difficult along Molland Lane. The owner of the site has indicated that it may be able to overcome this by using other land that it owns to provide alternative access.  |
| ASH005<br>Land at Molland Lane (HELAA 96 )  | Amber        | No                   | Ash Parish Council (APC) did not include this site due to the cumulative negative impact of the traffic from development of ASH004 which also would be using Molland Lane to access Guilton (road). Additionally, with the other sites allocated in the Ash NDP, the housing need number had been met without including this site. (See additional comments on AECOM Housing Need Assessment). | It is noted that it would be necessary to provide a landscape buffer to mitigate landscape harm to the adjacent Guilton conservation area.   |

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| ASH006<br>Land off Sandwich Rd<br>(HELAA 132 )                   | Red   | No  | Agree  |  |
| ASH007<br>Land to the rear of No.24 Sandwich Road<br>(HELAA 135) | Red   | No  | Agree  |  |
| ASH008<br>Land to the East of Queens Rd<br>(HELAA 136)           | Amber | No  | <p>APC did not include this site as it had been assessed RED by the AECOM Site Assessment. (See additional comments on the AECOM Site Assessment).</p> <ul style="list-style-type: none"> <li>- It is not possible to create a traffic access onto Queens Road due to the road being single lane width.</li> <li>- Land required to widen the road is not in the ownership of the applicant. Should this change, the amount of the site needed by the applicant to provide safe access would considerably alter the number of units that could be delivered.</li> <li>- It is not possible to provide access from the A257 without reducing the speed limit or the A257 and / or the construction of a roundabout. This would make any development non-economic. This is due to the amount of land that would have to be purchased and the cost of the roundabout construction.</li> <li>- There would be no way to provide a secondary access for emergency vehicles.</li> <li>-The traffic impact on the existing properties would considerably reduce their amenity.</li> </ul> | <p>It is noted that there are concerns from KCC Highways from the impact of cumulative traffic and highway access.</p> <p>ANP Group would question that there is low level landscape sensitivity as there are public rights of way adjacent to this site that give open rural views of importance to the amenity of this area of the village. Note the HELAA 136 application included the rugby field which has now been taken out. The loss of green space and amenity was also taken into consideration. <b>If this is now not the case, clarification is sought from DDC.</b></p> |
| ASH009<br>Rear of White Post Farm<br>(HELAA 137)                 | Blue  | Yes | <p>This site has outline planning permission for 33 houses. NDP carried forward 30 units with mitigation</p> <p>There is no ANP policy as mitigation and other issues will be dealt with at the full planning application stage. There are general Ash NDP policies for new developments.</p>  |  |
| ASH010<br>Land Adjacent Saunders Lane<br>(HELAA 152)             | Amber | No  | <p>APC did not include this site as it had been assessed RED by the AECOM Site Assessment. (See additional comments on the AECOM Site Assessment).</p> <ul style="list-style-type: none"> <li>- There are significant traffic access issues and cumulative impact from the existing properties adjacent on Collar Makers Green and traffic safety issues as the access is on to an open speed limit road (Sandwich Road).</li> <li>- There are drainage and ground flood issues.</li> <li>- Site topographical problems that will lead to significant problems for neighbouring properties. –</li> <li>- There is the loss of categorised woodland area.</li> <li>- It is against the Ash NDP principles of developing from the centre of the village outwards.</li> <li>- There is no usable vehicle secondary access.</li> </ul>   | <p>Note as at March 2020, there is a planning application in progress with access from additional land not included in the original site submission. KCC Highways has a holding objection on the application. Kent Fire &amp; Rescue Service has noted that the access from New Street is not suitable for fire engines. The Ash PC is objecting to this application.</p>  |
| ASH011<br>Land north of Guilton<br>(HELAA 163)                   | Red   | No  | Agree  |  |
| ASH011<br>Land south of Guilton<br>(HELAA 163)                   | Green | Yes | <p>APC included the south section, despite it being assessed RED by AECOM Site Assessment.</p> <p>This site is a brownfield site and the Ash NDP has a policy to develop brownfield sites before greenfield sites.</p> <ul style="list-style-type: none"> <li>- Mitigation for the site position and accessibility by foot is included in the ANP7e policy.</li> </ul>   | <p>It is noted that KCC had concerns over the cumulative traffic impact of the site. ANP Group would add its serious concerns about the cumulative traffic impact of all the sites on the exiting capacity of the Ash village roads. While this access is on to an open speed road limit, the impact from these 9 units and that there are no other immediate sizable developments in the vicinity, do not make this a concern specific to this site.</p>  |
| ASH012<br>Land at Guilton<br>(HELAA 169)                         | Red   | No  | Agree  |  |
| ASH013<br>Chequer Lane   | Blue  | Yes | <p>This site was allocated in the 2015 Local Plan for 93 units. As at March 2020, the site is under development and 73 units were carried forward in the Ash NDP, on the assumption that some units would be built by time</p>   |  |

|  |      |     |  |
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|  |      |     | of examination. The ground works have been delayed due to archaeological finds as at March 2020.                       |
| ASH014<br>Agri / Cowan site  | Blue | Yes | This site was allocated in the 2015 Local Plan for 95 units that has been carried forward in the Ash NDP <b>ANP7a</b>  |
| ASH015<br>Old Council Yard,<br>Molland Lea   | Blue | Yes | This site was allocated in the 2015 Local Plan for 5 units that has been carried forward in the Ash NDP <b>ANP7b</b> . |
| <b>Requests and comments:</b> The AECOM Site Assessment carried out in 2019 for Ash Parish Council, was based on criteria for assessment that had been discussed and agreed with the DDC Regeneration Team. Ash NDP Group would ask that the criteria for the current DDC assessment should be made available to the Ash Parish Council so that it can understand how the assessments differ and be able to make a detailed submission on this.  |      |     |  |
| <b>Requests and comments:</b> The AECOM Housing Needs Assessment carried out in 2019 for Ash Parish Council, and the assumptions used were incorporated in developing the Ash Draft NDP Plan.<br>The APC understands that the DDC figure has been revised and has a further 20% uplift. It would appear that this is arbitrary and not based upon national guidance. Further, based on the latest DDC Assessment of Need for the District housing figures, the additional allocation for Ash is more than 20%. How has this been calculated?<br>The Ash Parish Council would request that the criteria and process that led to the outcome that Ash should have a substantial increase in housing units over and above that already accepted in the ASH Draft NDP be available to the APC as soon as possible. This will enable the APC to make a detailed submission on the proposed new HELAA Suitability Assessment.<br>The Ash Parish Council and the Ash NDP Group would like to make it clear that at the present time, without the detailed workings of how DDC arrived at its site allocations and housing numbers, Ash does not accept the proposed site allocations that are not included in the draft Ash Neighbourhood Development Plan. |      |     |  |

**Langdon Parish Council sent the below comments by email on 27/03/2020**

Only site LAN003, (the field bounding the school, Long Hill Lane, Westside, Footpath ER45 and the Playing Field western boundary, East Langdon Road) is considered suitable "Green" criteria. All other six submitted sites in the East Langdon, Martin and Martin Mill area are graded "Red" unsuitable sites. The selection criteria used (HELAA Suitability Assessment) and the breakdown of scoring for each site have not been published as yet.

The proposed site LAN003 is for 65 dwellings, presumably on a DDC working density of 30 homes per hectare. For comparison, the 10 dwellings at Long Hill Lane in East Langdon are on a 0.33 Ha site, so roughly 30 per Ha. This might give an indication of density but obviously not layout. We would urge that DDC review this density, as it is not necessarily appropriate for a rural location. Unclear whether this is based on gross or net developable area; given the currently unmeasured landscape constraints (eg. ecology, visual impact, trees) this will need closer consideration from DDC. If the land-owner has submitted any sketch site layouts to demonstrate this capacity we would be keen to see this and have an input at the earliest opportunity. This is not to suggest that density is a bad thing, as many historic village centres can be around 50 dwellings!

The core part of East Langdon, say from the Old Vicarage by the village green to the parish hall contains 65 dwellings, rising to 103 when including Church Mews, Church Lane, Waldeshare Lane and Solton Lane.

So the proposed 65 dwellings would double the core village settlement.

Positives:

School Roll would increase, ensuring better viability Langdon School (providing classroom spaces can be increased)

More Council Tax revenue for parish council to improve facilities

Development of 65 homes would attract s106 or CIL developer contributions toward local facilities (new hall, more play area, tree schemes, footways to playing field, local shop?)

Affordable Homes (in theory) if rents /house pricing can be kept sensibly lower.

Improved bus services?

Agreed. Also would encourage an improved footpath connection from the bottom of Westside/The Street to connect the playing fields. Increasing population will improve viability for many smaller local services (buses, trains, post office, camp-site shop, etc). There are many forms of affordable housing that we can, as a parish, explore through our Neighbourhood Plan eg. low-cost starter homes, almshouses, etc. Typical DDC policy is 70% affordable rent and 30% shared ownership - we could look to improve on this with our own local policy that asks for alternate specialist forms of affordable that serve our specific need. We will need to back this up with Housing Need Survey data etc, but this will happen as part of our NDP process.

#### Negatives:

Doubling the core village area would impact on the rural "feel", and small village communal environment.

Additional traffic entering onto the narrow East Langdon Road-Hollands Hill or The Street-Solton Lane routes to reach the A258; likewise via Archers Court Road to Whitfield shop, A2, M2 and M20. The designated area is on rising ground, visibility would impact on rural landscape. (the edge of the Long Hill Lane houses is visible from A258).

Impact on rural views when walking the boundary footpath ER44/ER45.

Impact on current infrastructure. Water, sewage, power and Internet services. Waste disposal and recycling.

Access to local medical services, Doctors surgeries and Dental.

Agreed. Very special design parameters will need to be followed to avoid this development becoming a 1970s suburban cul-de-sac. We can set these parameters in our NDP, likely covering things like density, urban 'grain', landscape and place-making character, architectural styles and materials, etc.

#### Other options:

We need to understand the reasons for rejecting other submitted sites. Assuming the current National Planning Policy Framework (NPPF) to expand village settlements and above, ie not hamlets, then sites like LAN002 and LAN006 are outside any village settlement boundary. Likewise LAN007 would effectively co-join East Langdon and Martin Mill, destroying the rural separation. Agreed. These would have significant impact on existing settlement and landscape characters.

LAN005, behind Eastside Farm was expected to come up and might take 8 dwellings (my guess) – might have been rejected because of conservation area and 5 listed building close by? Agreed. Nevertheless, a high quality agricultural brownfield regeneration scheme would serve the area much better.

LAN004 was submitted last Land Allocation but rejected. I think it was for 20ish dwellings.

LAN001 – a surprise and might be 40ish dwellings. Currently rejected. Worth re-considering because although extending the settlement boundary, it is contained within road boundaries. The site is well screened by hedges and mature trees. Traffic access is onto lanes which lead onto A258 without going through the village. No pedestrian footway to village centre except for ER45/ER44.

Reduce target of 65 to 40-50 and use LAN001, LAN004. These sites are near the conservation area and listed building Langdon Court is close.

Agreed. A more dispersed approach would be much preferred, and would enable a variety of builders to compete on quality in the area, in keeping with the recommendations by Sir Oliver Letwin in his recent Housing Report. Multiple smaller sites would also be easier to 'phase' and manage impact on the local area, including the services mentioned above. The Parish should, through our NDP, certainly support this approach. DDC will need to advise on their criteria so we can actively work with them to achieve something a bit more rounded."

**Caple-Le-Ferne Parish Council made the below comments via email on 27/03/2020**

The following informal comments are based on the Dover District Council classification of sites:

- Red sites are rejected.
- Amber sites are worth consideration
- Green sites are considered possible.

On that basis, the Parish Council agree with the red classification of Caple-le-Ferne sites identified on the map.

Amber site CAP011 could be considered brown field/infill. As this site was previously a petrol filling station, buried tanks and site contamination may still exist. The site was previously rejected as it was divorced from the main settlement and would have a detrimental impact on the adjacent Area of Outstanding Natural Beauty (AONB).

Green sites CAP009 and CAP013 may be considered as infill, but only suitable for small scale development, because access via Cauldham Lane provides inadequate highway infrastructure and no footpaths. The impact of views from the adjacent AONB and bridleway ER253 must be considered with regard to green site CAP013.

Green site CAP006 sits outside the settlement of Caple-Le-Ferne, the impact of any development here would be detrimental to the setting of the AONB which borders the site to the West. Development on this scale is also considered totally inappropriate given the size of the existing settlement. The access points would be from Caple Street/Cauldham Lane (very rural), both providing completely inadequate highway infrastructure.

The recent outline approval of Green site CAP010 will be an added burden on this same inadequate highway infrastructure.

Therefore, the Parish Council are unable to support CAP006. This site was brought forward on a previous occasion when our Parishioners demonstrated their strength of feeling against such a large development.

**Shepherdswell-with-Coldred Parish Council sent the below comments via email on 27/03/2020 regarding Shepherdswell-with-Coldred, Elvington and Eythorne.**

On 15 January 2020 Shepherdswell with Coldred Parish council resolved:

“This Council is disposed at this time to oppose any major changes to the existing village confines as defined in the current Local Plan when the new draft Local Plan is published”.

With this in mind we feel that the site SHE003 at Westcourt Lane is totally inappropriate.

The vehicle access to the village is Westcourt Lane, and to the A2 for traffic travelling to Canterbury is Westcourt Lane and Cox Hill, both of which are unsuitable for this volume of traffic.

Pedestrian traffic from this site would be on a narrow road without footways which would be busy with the increased vehicle movements from the development.

Site SHE004 is the land that is concerning many residents of Shepherdswell. You have already received representations from the group Shepherdswell Against the Development. Although most of that site is considered unsuitable in this initial assessment the access to the potentially suitable land still stems from a narrow junction in Mill Lane which in turn can be very congested.

Eythorne & Elvington:

Sites EYT002, EYT003, EYT004, EYT008, EYT009, EYT012 and EYT015 combine to more than double the size of Elvington. We are very concerned that without adequate traffic management this will impact on Shepherdswell and, possibly to a lesser extent, Coldred as large volumes of traffic access the A2. Just suggesting the traffic uses other routes will not address this problem.