

# Public Document Pack



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27 November 2020

Dear Councillor

I am now able to enclose, for consideration at the meeting of the **CABINET** on Monday 7 December 2020 at 11.00 am, the following report that is being published as a supplement due to its size.

6 **LOCAL PLAN - REGULATION 18 CONSULTATION** (Pages 2-269)

To consider the attached report of the Head of Planning, Regeneration and Development.

Responsibility: Portfolio Holder for Planning and Regulatory Services

Yours sincerely

A handwritten signature in black ink, appearing to read "N. Smith", written over the text "Chief Executive".

Chief Executive

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<b>Subject:</b>	<b>LOCAL PLAN REGULATION 18 CONSULTATION</b>
<b>Meeting and Date:</b>	<b>Cabinet – 7 December 2020</b>
<b>Report of:</b>	<b>Ashley Taylor, Planning Projects and Policy Manager</b>
<b>Portfolio Holder:</b>	<b>Councillor Nicholas Kenton, Portfolio Holder for Planning and Regulatory Services</b>
<b>Decision Type:</b>	<b>Key</b>
<b>Classification:</b>	<b>Unrestricted</b>

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**Purpose of the report:** To seek approval to carry out consultation on the Regulation 18 draft Local Plan for the District.

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- Recommendation:**
- (1) That Cabinet approves the Local Plan Regulation 18 document, as set out in Appendix 1, for consultation for a period of eight weeks.
  - (2) That Cabinet approves the Regulation 18 Consultation Engagement Strategy as set out in Appendix 2.
  - (3) That the Head of Planning, Regeneration and Development, in consultation with the Portfolio Holder for Planning and Regulatory Services, be authorised to make minor changes to the consultation document, and to take all necessary steps to develop and carry out the regulation 18 consultation.
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## 1. Summary

- 1.1 The Council is in the process of developing a new Local Plan which will set out the planning and development framework for the district for the period up to 2040.
- 1.2 Consultation is proposed to be carried out in relation to the issues which the Local Plan should address, the options for addressing those issues and a proposed preferred option. The consultation includes draft policies and site allocations based upon the preferred options. The consultation document is set out in Appendix 1.
- 1.3 The consultation is proposed to meet the requirements of Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 which requires consultation to take place on the preparation of the Plan.
- 1.4 This report sets out background information regarding the formulation of a Local Plan, summarises the proposals contained within the plan, and recommends consultation be carried out for a period of 8 weeks, in accordance with the engagement strategy set out in Appendix 2.

## 2. Introduction and Background

- 2.1 The Council has a statutory duty to prepare a Local Plan under section 19 of the Planning and Compulsory Purchase Act 2004. The Local Plan is a development plan document that sets out the vision, framework and policies for guiding new development in Dover district over the next 20 years.

- 2.2 The new Local Plan will replace the existing 'Development Plan' that currently consists of the Adopted Core Strategy (2010), the Land Allocations Local Plan (2015), and the saved policies from the 2002 Local Plan. The new Local Plan will:
- Set the strategic planning policies of the Council, taking account of key factors like population trends, economic growth, climate change, resources and built and natural environmental character;
  - Set the general scale and distribution of the new development which is required to meet Dover's needs to 2040;
  - Provide the planning principles, including detailed 'development management' policies to guide decisions on planning and other applications;
  - Show in detail where new homes, workplaces and facilities will be located through allocations of land; and
  - Show key environmental designations and include specific policies for the conservation and enhancement of those historic and natural assets.

### **Why do we need to prepare a new Local Plan?**

- 2.3 Since the adoption of the Core Strategy in 2010, there have been a number of changes to the planning system, with the abolition of Regional Spatial Strategies (the South East Plan), the publication of the National Planning Policy Framework in 2012, and the recent revisions to the NPPF in 2018 and 2019. As a result of the changes in the system and in both local and national circumstances in the last decade, some of the policies in the Council's current Plan are out-of-date (notably Policies DM1, DM2, CP2, CP3) and therefore are no longer able to guide decision-making in the manner in which they were intended to.
- 2.4 The Government has also introduced the requirement for Council's to review their Plans every five years, to ensure they remain relevant and responsive to changes in the market, especially in relation to housing growth.
- 2.5 The Government wants to see every community covered by an up-to-date plan for sustainable development - meaning that communities are in control of development and are less exposed to speculative development. As made clear in the National Planning Policy Framework, the preparation and implementation of these plans is key to achieving sustainable development.
- 2.6 Having an up to date Local Plan which identifies sufficient land to meet the development needs of the district will also ensure the Council can demonstrate a five year housing land supply, and should assist in increasing the delivery of housing in order to meet the requirements of the Housing Delivery Test. Without an up to date local plan, these tests will be much harder to meet, and we are higher risk of speculative applications for development with less control over where new development is permitted.
- 2.7 It is therefore essential that the district has an up-to-date Plan which sets out the vision and framework for the future development of the area, and to explain how the Council intends to deliver an increase in housing numbers, whilst also delivering jobs, retail and leisure facilities and open spaces, and balancing this need against a range of environmental and natural constraints.

### **What are the expectations of the Government?**

2.8 The Governments objectives are set out in the National Planning Policy Framework (NPPF) 2019. The NPPF places Local Plans at the heart of the planning system and makes clear that local authorities should:

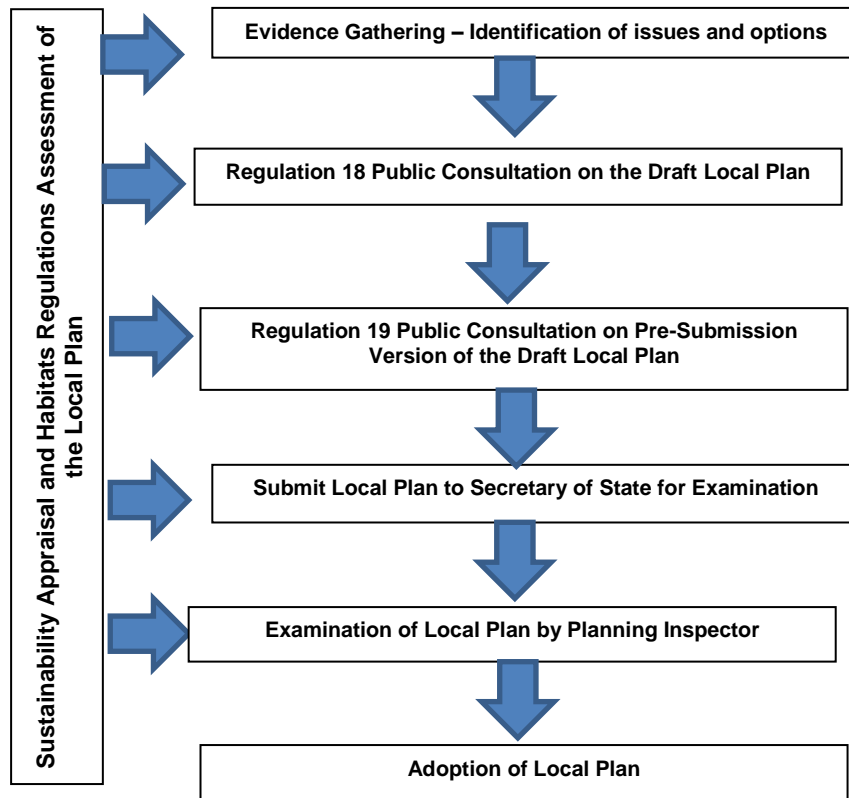
- Contribute to the achievement of sustainable development (para.7): There are three key objectives to achieving sustainable development: economic, social and environmental. The policies in the new Local Plan will therefore need to seek opportunities to make a positive contribution to these objectives and ensure that the presumption in favour of sustainable development lies at the heart of the Local Plan.
- Positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change (para 11).
- Support the Government’s objective of significantly boosting the supply of homes (para 59): As a minimum the Government expects Local Authorities to provide for the objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (para 11)
- Co-operate with other Local Planning Authorities and County Councils (in two tier areas), and with other prescribed bodies, under the duty to co-operate, on strategic matters that cross administrative boundaries (para 24). In order to demonstrate effective and on-going joint working, we are required to prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these.

2.9 Local Plans are subject to independent examination, where they are tested against what are known as the ‘tests of soundness’. The NPPF (2019) sets out the tests of soundness (para 35). Plans are sounds if they are:

- a) Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

### **The plan making process and timetable**

2.10 The process for producing a local plan is set out in legislation and guidance, with the key stages being set out below:



2.11 The timetable for the preparation of the Local Plan is set out in the Local Development Scheme (LDS). An update to the current LDS is the subject of a separate report on this Cabinet agenda. The regulation 18 consultation was originally envisaged to have taken place during Summer of this year, but the ongoing situation regarding COVID-19 impacted on our ability to complete the necessary evidence base for the plan, as well as carry out meaningful consultation at the time. As a result, it was necessary to delay the consultation, which is now proposed to commence in January 2021, subject to Cabinet approval of this report.

### **Evidence base**

2.12 The early stages of the process for producing the Local Plan includes the research and production of the evidence base which is required to justify the proposals in the local plan. The evidence base is used to identify the issues that need to be addressed by the Local Plan, and the options there are for addressing these. A full list of the evidence which has been produced to support and inform the Local Plan is set out at pages 196-200 of Appendix 1. Some of these studies have already been published on the Local Plan webpages. The remainder will be published at the time of the consultation starting. The consultation document refers to and explains how the evidence base has been used to inform the issues, options and preferred policy options set out in the document.

### *Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA)*

2.13 As part of the evidence base, the Planning and Compulsory Purchase Act 2004 requires Local Plans to be subject to Sustainability Appraisal (SA). SA is designed to ensure that the plan preparation process maximises the contribution that a plan makes

to sustainable development and minimises any potential adverse impacts. The SA process involves appraising the likely social, environmental and economic effects of the policies and proposals within a plan from the outset of its development.

2.14 Strategic Environmental Assessment (SEA) is also a statutory assessment process, required under the SEA Directive<sup>1</sup>, transposed in the UK by the SEA Regulations<sup>2</sup>. The SEA Regulations require the formal assessment of plans and programmes which are likely to have significant effects on the environment and which set the framework for future consent of projects requiring Environmental Impact Assessment (EIA)<sup>3</sup>. The purpose of SEA, as defined in Article 1 of the SEA Directive, is:

“to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans...with a view to promoting sustainable development”.

2.15 SEA and SA are separate processes but have similar aims and objectives. SEA focuses on the likely environmental effects of a plan whilst SA includes a wider range of considerations, extending to social and economic impacts. The Government’s planning practice guidance<sup>4</sup> shows how it is possible to satisfy both requirements by undertaking a joint SA and SEA process.

2.16 A key part of the SA process is the assessment of reasonable alternatives. This has been carried out for the levels of growth (housing and employment), spatial alternatives for delivering this growth, the ‘green’ and ‘amber’ rated sites identified in the Housing and Economic Land Availability Assessment, as well as development management policy options. Where most relevant, the draft Local Plan consultation document at Appendix 1 sets out how the SA assessment has influenced the process of determining the preferred options. It should be noted, however, that the SA does not decide which options should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision.

2.17 The SA is an iterative process with initial conclusions of the assessment being used to refine the policies in the draft Local Plan, which will then be subject to a final assessment through the SA process. This will be set out in a SA report which is currently being finalised and will be consulted upon alongside the regulation 18 consultation.

2.18 Alongside the evidence gathering stage, consultation with stakeholders has also taken place through the following:

- Local Plan workshops in 2018
- Consultation with Ward Councillors and Town and Parish Councils on the Housing and Economic Land Availability Assessment (2019/2020)
- Meetings of the Local Plan Project Advisory Group
- Informal consultation with statutory consultees and infrastructure providers to inform the evidence base

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<sup>1</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004/1633), as amended by The Environmental Assessments and Miscellaneous Planning (Amendment) (EU Exit) Regulations 2018 (SI 2018/1232).

<sup>3</sup> Under EU Directives 85/337/EEC and 97/11/EC concerning EIA.

<sup>4</sup> See <https://www.gov.uk/government/collections/planning-practice-guidance>

- Duty to co-operate engagement with neighbouring local authorities.

2.19 This has all been used to inform the production of the Local Plan Regulation 18 Consultation Document which is set out in Appendix 1.

### 3. **Local Plan Regulation 18 Consultation Document**

3.1 The purpose of the consultation is to seek views on:

- the key issues that the new Plan should address,
- a draft vision for Dover District in 2040 and the objectives needed to meet that vision,
- the options that have been considered to address the key issues and growth and development needs,
- the draft strategy for meeting growth and development needs over the next 20 years,
- the land identified which is expected to be needed to meet this strategy and draft policies for guiding that development, and
- draft policies to address climate change, for delivery high quality development and for protecting and enhancing the natural, built and historic environment of the District.

3.2 The document has been structured in the following chapters:

Chapter 1 - Introduction

Chapter 2 – Responding to the Consultation

Chapter 3 – Dover District Spatial Portrait

Chapter 4 – Vision and Objectives

Chapter 5 – Climate Change

Chapter 6 – Housing

Chapter 7 – Employment and the local economy

Chapter 8 – Retail and Town Centres

Chapter 9 – Transport and Infrastructure

Chapter 10 – Design

Chapter 11 – Natural Environment

Chapter 12 – Historic Environment

3.3 Each of the topic-based chapters are structured to identify the key issues in relation to that topic, the options which been identified to address the issues, and the identification of the Council's preferred policy option. This is followed by draft supporting text, policies and site allocations. Justification for the proposals are set out in the consultation document, the following identifies the key issues set out in each of the topic-based chapters.

#### *Vision and Objectives*

3.4 The overarching vision for the plan should set out what the Council intends to achieve for the District over the next 20 years. The vision informs the objectives and policies within the plan. The vision has been developed from the evidence base and consultation, including the Local Plan workshops that were carried out in 2018, and the Virtual Visioning Event which has held on 30<sup>th</sup> July 2020. The vision should be locally specific and avoid generalised aspirations. It should also reflect the Council's vision and priorities set out in the Corporate Plan.

- 3.5 The proposed vision and objectives are set out in four themes relating to prosperous economy, vibrant communities, thriving places and spectacular and sustainable environment. There are also cross-cutting objectives identified. The draft vision and objectives are set out from pages 20 to 22 of Appendix 1.

*Climate change – Chapter 5 (pages 24-40)*

- 3.6 The Local Plan is intended to support the Council's strategy on climate change particularly in relation to the built environment. The chapter incorporates a range of topics and policies which aim to ensure that development proposals which come forward mitigate against and adapt to the effects of climate change. This includes proposed policies in relation to:

- Reducing Carbon emissions (DM Policy 1) – requiring new residential development to meet deliver a 31% reduction in carbon emissions below the target emission rate (TER) as set out in Buildings Regulations Part L (2013). Commercial development is required to meet BREEAM 'Very Good' standard overall, including Very Good for addressing maximum energy efficiencies under the energy credits.
- Sustainable Design and Construction (DM Policy 2) – requiring development to meet several criteria to further reduce carbon emissions
- Renewable and Low Carbon Energy (DM Policy 3) – supporting installations for renewable energy developments subject to criteria to minimise any harmful impacts
- Sustainable Travel (DM Policy 4) – requiring provision of non-car-based modes of transport within development, as well as electric car charging points
- Water efficiency (DM Policy 5) – requirements of water efficiency measures in new development
- Flood risk (DM Policy 6) – sets out how flood risk will be considered when determining planning applications
- Surface Water Management (DM Policy 7) – requires sustainable drainage systems to accommodate surface water in new developments
- Coastal change (DM Policy 8) – policy to avoid inappropriate development within the identified Coastal Change Management Areas
- Tree Planting and Protection (DM Policy 9) – requiring a minimum of 2 trees to be planted for every new home provided.

*Housing – Chapter 6 (pages 41-97)*

- 3.7 In accordance with national policy, the plan must seek to meet the District's identified housing need based upon the standard methodology for calculating housing need. This currently equates to 596 dwellings per year for Dover District, and the preferred option for housing growth is to meet this need in full.
- 3.8 The chapters set out how this housing requirement will be delivered. As set out in Table 6.1 on page 54, the housing requirement is proposed to be met through extant planning permissions, the Whitfield Urban Extension, windfall sites, and proposed site allocations. The plan needs to provide specific site allocations for 5,288 dwellings across the plan period in order to meet the housing need.
- 3.9 The reasonable alternatives for the spatial distribution of this level of housing has been identified and assessed through the SA, and the options are set out at paras 6.24-6.38 (pages 45-46) of Appendix 1.
- 3.10 The recommended preferred strategy is a combination of three of the options (A; HELAA sites; C: settlement hierarchy and D; Dover focus), with the distribution of



housing growth primarily being based upon the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery. This results in the following proposed distribution of housing development across District, as set out in Table 6.2 of Appendix 1.

Dover	48%
Deal	7%
Sandwich; Aylesham	20%
Eastry; Wingham, Ash, Shepherswell, St Margarets ar Cliffe; Eythorne/Elvington	15%
Larger villages	9%
Smaller villages and hamlets	1%

- 3.11 This proposed strategy continues to focus on the development and regeneration of Dover Town, with around half of new housing development planned there, the majority of which is to be delivered by the urban extension at Whitfield. Development is proposed at Deal and Sandwich, however environmental and highways constraints do limit the availability of suitable sites and therefore levels of development at those settlements. The secondary focus for development is proposed at the Rural Service Centre of Aylesham. The remainder of housing growth is proposed to be distributed across the Districts local centres, villages and hamlets, taking into account their relative sustainability and individual site constraints and availability. As part of the strategy for the rural area, it is proposed to grow the villages of Eyethorne and Elvington to create a new local centre in the District.
- 3.12 Specific sites have been selected taking into account the site specific assessments carried out as part of the Housing and Economic Land Availability Assessment, the SA, alongside consideration of the spatial strategy, sustainability of settlements, and other parts of the evidence base including the transport modelling and viability testing.
- 3.13 The draft policies are set out as four strategic site policies, covering development at Whitfield (Strategic Policy 4, Aylesham (2 sites – Strategic Policies 5 and 6) and Eythorne/Elvington (Strategic Policy 7). A further policy (Site allocations Policy 1) sets out the proposed non-strategic housing allocations.
- 3.14 Residential windfall development (sites which come forward for development which have not been allocated) is expected to contribute to the supply of housing over the plan period. A policy to direct proposals to suitable and sustainable locations is therefore proposed. The preferred option is to allow in principle development within and adjoining the largest settlements and villages within the District (in accordance with the settlement hierarchy), with the smaller villages and hamlets allowing development within existing settlement boundaries. The draft policy (Strategic Policy 3 – pages 57-58) sets out criteria which would need to be satisfied to ensure proposals do not cause unacceptable harm, including consideration of the scale of the proposals in relation to the size of the settlement and services which are available within it.
- 3.15 The proposed requirements for affordable housing are set out in draft Development Management Policy 12 (pages 90-92). This requires 30% affordable housing on new development, with the exception of the existing Dover Urban Area. National policy and guidance require that Local Plans be subject to viability testing to ensure that the policies are deliverable. The Local Plan Whole Viability Study has tested a number of

viability scenarios with differing thresholds and tenure splits in order to ascertain the most appropriate and deliverable levels of affordable housing within the district. The study has concluded that within the Dover Urban Area it is not viable to provide affordable housing.

- 3.16 The chapter also covers the provision of Gypsy and Traveller Accommodation, and it is recommended that the full PPTS and cultural needs for Gypsy and Traveller Accommodation are met through the identification of specific sites. This includes the proposed intensification of existing sites (DM Policy 10) and sites allocations at Aylesham and Alkham (Strategic Policy 6 and Site allocations Policy 2 respectively). It is recognised that further sites are still required to meet the need in full, and it is therefore proposed that a further call for sites will be carried out as part of the consultation.
- 3.17 The chapter also includes development management policies covering issues in relation to housing mix and type (DM Policy 11), houses in multiple occupation (DM Policy 17), self and custom build housing (DM Policy 15), rural local needs housing (DM Policy 13), gypsy and traveller windfall accommodation (DM Policy 14) and residential extensions and annexes (DM Policy 16).

#### *Local Economy (pages 98-114)*

- 3.18 This chapter sets out the economic strategy for the plan including the identification of proposed employment allocations, with the aim of delivering higher levels of economic growth in the District across the plan period. At the current time there are uncertainties around this issue, and the evidence base (Economic Development Needs Assessment 2017 – EDNA) which seeks to identify the level of job growth and land requirements needs to be updated. In terms of the overall strategy, the current EDNA identifies very limited potential job growth and therefore limited need for employment allocations. In order to support and justify proposals which aim to deliver a higher level of economic growth in the District an Economic strategy is being developed. The emerging themes for this Strategy are set out at para 7.33 (pages 104-105). The strategy will be used to inform an updated EDNA following the regulation 18 consultation. The jobs targets and land requirements would be specified in an updated Strategic Policy 8 – Economic Growth (page 105).
- 3.19 The draft employment site allocations policy (SP9 – pages 105-107) proposes to roll forward the existing employment site allocations which have yet to be built out. However, given the uncertainties around the future use of White Cliffs Business Park, and the potential growth opportunities in the District, there is likely to be a need for further land, and therefore a call for sites is proposed to be carried out as part of the consultation.
- 3.20 The chapter also includes policies in relation to:
- New Employment Development (DM Policy 18)
  - Retention of Existing Employment Sites (DM Policy 19)
  - Loss or redevelopment of existing employment premises (DM Policy 20)
  - Home-working (DM Policy 21)
  - Rural Economy - Conversion/re-build of building in the countryside and development in the countryside (DM Policy 22)
  - New Employment Premises in the Countryside (DM Policy 23)
  - Tourism and Tourist/visitor Accommodation (DM Policy 24)

#### *Town Centres and Retail (pages 115-135)*

3.21 This chapter sets out the strategy for the town centres in the District, including identifying the need for additional retail and other town centre development.

3.22 The chapter proposes the following policies:

- Quantity and Location of Retail Development (Strategic Policy 10)
- Dover Town Centre (Strategic Policy 11) - the overarching strategy for the future of Dover Town Centre, including a proposed contraction of the town centre boundary.
- Deal and Sandwich Town Centres (Strategic Policy 12) – the strategy for Dover and Sandwich Town Centres
- Primary Shopping Area (DM Policy 25) – identifies the primary shopping areas of Dover, Deal and Sandwich town centres, where the focus for commercial development is proposed.
- Sequential Test and Impact Assessments (DM Policy 26)
- Local Centres (DM Policy 27)
- Shopfronts (DM Policy 28)

*Transport and Infrastructure (pages 136-150)*

3.23 Ensuring that the right infrastructure, is provided in the right place, at the right time, to support the scale of growth identified in the Plan will be integral to its successful delivery. The Local Plan will be supported by an Infrastructure Delivery Plan which will identify specific infrastructure needs. Early engagement has taken place with infrastructure providers, however further work is required to identify the specific infrastructure requirements needed to support the development set out in the Plan. This is proposed to take place through the regulation 18 consultation, and engagement will continue to inform the next version the Plan. It is proposed that specific requirements will be set out in site policies where these are known.

3.24 Alongside any site-specific requirements, this chapter sets out the policies in relation to transport and infrastructure considerations. This includes the following proposed policies:

- Infrastructure and Developer Contributions (Strategic Policy 13) – overarching requirements for development to deliver the required infrastructure.
- Strategic Transport Infrastructure (Strategic Policy 14) – supporting improvement to the A2 through the Dover Access Strategy
- The highway network and highway safety (DM Policy 29) – requirements for transport assessment, travel plans and mitigation
- Parking provision on new development (DM Policy 30)
- Providing open space (DM Policy 31)- requirement for open space provision on new development
- Playing pitch strategy (DM Policy 32) – requirements for playing pitch provision to support new development
- Protection of open space (DM Policy 33)
- Community facilities (DM Policy 34)
- Digital Technology (DM Policy 35) – requirements for all new development to be provide with the infrastructure to support high speed broadband

*Design (Pages 151-159)*

- 3.25 The NPPF (2019) states that Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.
- 3.26 At present the Core Strategy doesn't contain any design policies and officers instead rely on the provisions in the NPPF. The Local Plan seeks to address this and proposes three design policies:
- Place-making (Strategic Policy 15) - provides clear design expectations for proposals that come forward in the District and sets out a number of key principles that should inform all development from the earliest stages of the design process. These relate to context and continuity, built form, movement, nature, public spaces, uses and lifespan.
  - Achieving High Quality Design (DM Policy 36) - provides more detailed design guidance. It also highlights that where significant design implications are identified on major proposals these will be referred to a Design Review Panel.
  - Quality of Residential Accommodation (DM Policy 37) - sets out a number of criteria that developments must meet to ensure the delivery of high quality residential accommodation, including meeting the nationally described space standards, and accessible and wheelchair home requirements.

*Natural Environment (pages 160-181)*

- 3.27 This chapter addresses issues in relation to the Natural Environment of the District, with the aim of conserving and enhancing the environment of the District. This includes the following proposed policies:
- Protecting the District's Hierarchy of Designated Environment Sites (Strategic Policy 16)
  - Green Infrastructure and Biodiversity (Strategic Policy 17)
  - Requiring Biodiversity Net Gain (DM Policy 38)
  - Landscape Character (DM Policy 39)
  - Thanet Coast and Sandwich Bay SPA Mitigation Strategy (DM Policy 40)
  - Air Quality (DM Policy 41)
  - Water supply and quality (DM Policy 42)
  - The River Dour (DM Policy 43)

*The Historic Environment (pages 182-190)*

- 3.28 The current planning policy framework for the District includes only one historic environment policy (for applications affecting Historic Parks and Gardens, Policy DM19), and a strategic site policy for Dover Western Heights (Policy LA11). Such an approach is at odds with the NPPF which requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This chapter therefore proposed the following policies to address issues in relation the historic environment:
- Protecting the District's Historic Environment (Strategic Policy 18)
  - Designated and non-designated heritage assets (DM Policy 44)
  - Conservation Areas (DM Policy 45)
  - Archaeology (DM Policy 46)

- Dover Western Heights Fortifications SM and Conservation Area (DM Policy 47)
- Historic Parks and Gardens (DM Policy 48)

#### 4. **Consultation proposals and methods**

4.1 The regulations do not set out a minimum time period for this consultation. It is proposed that the consultation will run for a period of 8 weeks. It is currently anticipated that the consultation will commence before the end of January 2021.

4.2 The regulations require that we consult with specific consultation bodies, general consultation bodies and residents and other persons carrying out business in the area. Officers are in the process of updating the Local Plan consultation database, to ensure all contact details are up to date and to get them set up on the online system in order to prepare for the consultation. The following groups will be directly contacted and invited to respond:

- Interest and Community groups
- Schools/Education establishments
- Developers/ Agents / Architects / Affordable Housing providers
- Other Local Authorities and KCC
- Town and Parish Councils
- Local Businesses
- Executive non-departmental public bodies
- Infrastructure Providers
- Mobile and Broadband providers
- Individuals registered on the Local Plan consultation portal

4.3 It is proposed to make the wider community and others who will not be written to specifically aware of the consultation through a variety of the following methods:

- Council's website including a bespoke website for the plan
- Notices in local papers and newsletters
- Leaflets and summary literature to be placed in various public locations
- Use of social media – Facebook, Twitter and LinkedIn
- Encouraging Parish Council's and community groups to publicise the consultation in their local areas

4.4 In normal circumstances it would be expected that hard copies be deposited at local libraries for viewing. However, given the current restrictions relating to COVID-19 this will not be possible. For those who are unable to access the document online, hard copies will be made available.

4.5 A proposed consultation engagement strategy is set out in full in Appendix 2. The consultation strategy has been adapted to take into account the current restrictions with COVID-19, whereby no face-to-face consultation events are planned to take place.

4.6 The following consultation activities are proposed:

- Local Plan website and virtual exhibition – a dedicated Local Plan website is being developed

- Online stakeholder and public consultation events
- Dedicated telephone hotline for the general public
- Town and Parish Council online tutorials

### **Responding to the consultation**

- 4.7 All those responding will be encouraged to do so through the Council's online consultation portal. This is the quickest and easiest way to respond to the consultation and is also the most efficient way for comments to be recorded and analysed by Officers following the consultation.
- 4.8 A specific consultation questionnaire will be provided to enable comments to be made in relation to specific issues and at specific points throughout the consultation document.
- 4.9 For those who are unable to respond through this method, alternative options will be made available and hard copy submissions will be accepted.

### **Next Steps**

- 4.10 Following the close of the consultation all comments will be reviewed and considered, and changes will be made to address comments received. A consultation statement will be produced to explain how comments have been taken into account, and where it has not been possible to do so, explain why.
- 4.11 Work is required to update the evidence base, and a Final Draft (reg 19 submission version) of the Plan will be produced. That will be subject to a further consultation in late 2021, and then it will be submitted to the Planning Inspectorate for examination.

### **5. Identification of Options**

- 5.1 Option 1 – Agree to carry out the regulation 18 Local Plan consultation
- 5.2 Option 2 – Do not carry out or delay the proposed consultation

### **6. Evaluation of Options**

- 6.1 This consultation needs to be carried out in order to meet the legal requirements for production of a Local Plan, it is therefore not an option to not carry out consultation if we are to continue to progress the adoption of a new Local Plan.
- 6.2 In order to ensure that the Council has an up to date Local Plan in place as soon as possible, and to ensure that adoption of the Plan can take place no later than the beginning of 2023, this consultation needs to take place as soon as possible.
- 6.3 In addition to this, MHCLG has recently consulted on changes to the planning system which has the potential to significantly impact upon the local plan process and the housing need that would have to be planned for. In order to provide the best chance of being able to continue with the current plan proposals and get a local plan adopted in the shortest timescales it is important that we carry out the regulation 18 consultation as soon as possible.
- 6.4 There will be the opportunity to further consider the proposed draft policies and site allocations during the consultation process and in light of the consultation responses.
- 6.5 If we do not carry out or delay the consultation, this will have the effect of delaying the production of the Local Plan and would mean extending the time which the Council does not have an up to date plan. This could also result in the Council not meeting the deadline set by Government, that all local authorities must have an up to date plan in place by the end of 2023. This could result in central government intervention in the plan-making process, potentially removing local control.

**7. Resource Implications**

- 7.1 The cost of preparing the Local Plan, the associated evidence base and examination are currently included in the Special Projects programme. The total budgeted expenditure for the project is £285k as detailed in the revised General Fund budget and projects programmes approved by Council on 21<sup>st</sup> October 2020.

**8. Climate Change and Environmental Implications**

- 8.1 Consultation of the Local Plan does not in itself have any Climate Change and Environmental Implications.

**9. Corporate Implications**

- 9.1 Comments from the Equality Officer - An Equality Impact Assessment has been carried out to identify and mitigate any negative impact upon the protected characteristic groups and will be revisited post consultation. The Equality Officer has been consulted during the development of the report and has no further comments to make, other than to remind Members that in discharging their responsibilities they are required to comply with the public sector equality duty as set out in section 149 of the Equality Act 2010 <http://www.legislation.gov.uk/ukpga/2010/15/section/149>
- 9.2 Comments from the Section 151 Officer: The Head of Finance and Investment has been consulted on this report and has no further comments to add.
- 9.3 Comments from the Planning Solicitor: The Planning Solicitor has been consulted in the production of this report and has no further comments to make'

**10. Appendices**

Appendix 1 – Dover District Local Plan Regulation 18 Consultation; Maps of Proposed Housing allocations; Maps of Proposed Gypsy allocations; Maps of Proposed Employment allocations.

Appendix 2 – Consultation Engagement Strategy

Appendix 3 – Equalities Impact Assessment

Contact Officer: Ashley Taylor, Planning Policy and Projects Manager



# Dover District **Local Plan**



A bold vision for **2040**







## List of Draft Local Plan Policies

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## **Strategic Policies**

Strategic Policy 1: Planning for Climate Change

Strategic Policy 2: Housing Growth

Strategic Policy 3: Residential Windfall Development

Strategic Policy 4: Whitfield Urban Expansion

Strategic Policy 5: North Aylesham

Strategic Policy 6: South Aylesham

Strategic Policy 7: Eythorne and Elvington Local Centre

Strategic Policy 8: Economic Growth

Strategic Policy 9: Employment Allocations

Strategic Policy 10: Quantity and Location of Retail Development

Strategic Policy 11: Dover Town Centre

Strategic Policy 12: Deal and Sandwich Town Centres

Strategic Policy 13: Infrastructure and Developer Contributions

Strategic Policy 14: Strategic Highway Infrastructure

Strategic Policy 15: Place Making

Strategic Policy 16: Protecting the Districts Hierarchy of Designated Environment Sites

Strategic Policy 17: Green Infrastructure and Biodiversity

Strategic Policy 18: Protecting the Districts Historic Environment

## **Site Allocations Policies**

SA Policy 1: Housing Allocations

SA Policy 2: Land to the south of Alkham Valley Road / Land to the rear of The Meadows, Alkham

Strategic Policy 4: Whitfield Urban Expansion

Strategic Policy 5: North Aylesham

Strategic Policy 6: South Aylesham

Strategic Policy 7: Eythorne and Elvington Local Centre

Strategic Policy 9: Employment Allocations

DM Policy 10: Gypsy and Traveller Site Intensification

## **Development Management Policies**

DM Policy 1: Reducing Carbon Emissions

DM Policy 2: Sustainable Design and Construction

DM Policy 3: Renewable and low carbon energy

DM Policy 4: Sustainable Travel

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DM Policy 5: Water Efficiency

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DM Policy 6: Flood Risk

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DM Policy 7: Surface Water Management

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DM Policy 8: Coastal Change Management Areas

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DM Policy 9: Tree Planting and Protection

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DM Policy 10: Gypsy and Traveller Site Intensification

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DM Policy 11: Type and Mix of Housing

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DM Policy 12: Affordable Housing

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DM Policy 13: Rural Local Needs Housing

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DM Policy 14: Gypsy and Traveller Windfall Accommodation

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DM Policy 15: Self Build and Custom House Building

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DM Policy 16: Residential Extensions and Annexes

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DM Policy 17: Houses in Multiple Occupation

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DM Policy 18: New Employment Development

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DM Policy 19: Retention of Existing Employment Sites

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DM Policy 20: Loss or re-development of employment sites and premises

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DM Policy 21: Home Working

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DM Policy 22: Conversion or Re-build of Rural Buildings for Economic Development Purposes

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DM Policy 23: New Employment Premises in the Countryside

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DM Policy 24: Tourism and Tourist/Visitor Accommodation

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DM Policy 25: Primary Shopping Areas

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DM Policy 26: Sequential Test and Impact Assessment

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DM Policy 27: Local Centres

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DM Policy 28: Shop Fronts

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DM Policy 29: The Highway Network and Highway Safety

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DM Policy 30: Parking Provision on new Development

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DM Policy 31: Providing Open Space

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DM Policy 32: Playing Pitch Strategy

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DM Policy 33: Protection of Open Space

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DM Policy 34: Community Facilities

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DM Policy 35: Digital Technology

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DM Policy 36: Achieving High Quality Design

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DM Policy 37: Quality of Residential Accommodation

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DM Policy 38: Biodiversity Net Gain

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DM Policy 39: Landscape Character

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DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy

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DM Policy 41: Air Quality

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DM Policy 42: Water Supply and Quality

---

DM Policy 43: The River Dour

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DM Policy 44: Designated and Non-designated Heritage Assets

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DM Policy 45: Conservation Areas

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DM Policy 46: Archaeology

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DM Policy 47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area

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DM Policy 48: Historic Parks and Gardens

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1

# Introduction

**1.1** The District Council has started the process of developing a new Local Plan for the District which will replace the existing Core Strategy and Land Allocations Local Plan.

**1.2** This document sets out the Council's emerging draft Local Plan for consultation. We want people to engage fully in this process so that responses can be fed into the next draft of the Plan. This is your opportunity to identify the key issues that need to be addressed and to shape the future development of Dover District.

## What is a Local Plan?

**1.3** A Local Plan sets out a vision and a framework for the future development of the area, addressing needs and opportunities for housing, the economy, community facilities and infrastructure, as well as the basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

**1.4** The Local Plan is at the heart of the planning system and provides the framework for all planning decisions to be judged against.

## Why are we producing a new Local Plan?

**1.5** The District's existing Local Plan consists of the Core Strategy 2010 and the Land Allocations Plan 2015, as well as saved policies from the 2002 Local Plan. The Government has made changes to legislation, policy and guidance since these plans were developed, which means they need to be reviewed and updated.

**1.6** The Government requires all local authorities to have an up to date local plan in place by December 2023. New Plans can take several years to finalise and so it is important we make progress now.

## What have we done so far?

**1.7** So far we have:

- carried out stakeholder workshops which have helped to inform the key issues that the Plan needs to address
- developed the evidence which is needed to support the Plan
- identified and assessed the different options for delivering the required growth and development
- carried out targeted stakeholder consultation on specific issues to inform the draft plan for consultation
- liaised with our neighbouring authorities under the duty to co-operate to agree statements of common ground in relation to cross border issues
- prepared draft policies and proposals which form the basis of this consultation document

## What happens after this consultation?

**1.8** Following the end of the consultation we will:

- review and consider all responses received to the consultation and;
- complete the evidence supporting the plan

**1.9** Based upon the above we will produce a final draft of the Plan (called a Regulation 19 Submission Plan) which will be subject to further consultation prior to submission for examination.



2

How to get involved



2.1 The purpose of this consultation is to ask for your views on:

- the key issues that the new Plan should address,
- a draft vision for Dover District in 2040 and the objectives needed to meet that vision,
- the options that have been considered to address the key issues and growth and development needs,
- the draft strategy for meeting growth and development needs over the next 20 years,
- the land identified which is expected to be needed to meet this strategy and draft policies for guiding that development, and
- draft policies to address climate change, and for protecting and enhancing the natural, built and historic environment of the District.

## Who should get involved in this consultation?

2.2 We are seeking views from the whole community, including residents and community groups, businesses, landowners, developers, as well as statutory consultees, delivery partners and infrastructure providers.

2.3 If you have an interest in the future of Dover District this is your opportunity to help shape the future plan for the District.

## How can I get involved?

2.4 To be completed when consultation strategy has been agreed.



3

Spatial portrait

3.1 This chapter provides a spatial portrait of the District.

## Geography

3.2 Dover District is located on Kent's east coast, at the narrowest point along the English Channel, between the United Kingdom and mainland Europe. Calais is only 34 kilometres across the Strait of Dover, meaning Dover is an important gateway to the continent and beyond. The District covers an area of 320 square kilometres, and has around 32 kilometres of coastline. The District is bounded by Thanet to the north, Canterbury to the west and Folkestone and Hythe to the south.

3.3 There are two main urban areas within the District: Dover with its ports to the south and Deal with its Pier and beaches to the east. There are also the rural service centres of medieval Sandwich and Aylesham, a garden community designed by Sir Patrick Abercrombie during the 1920s.

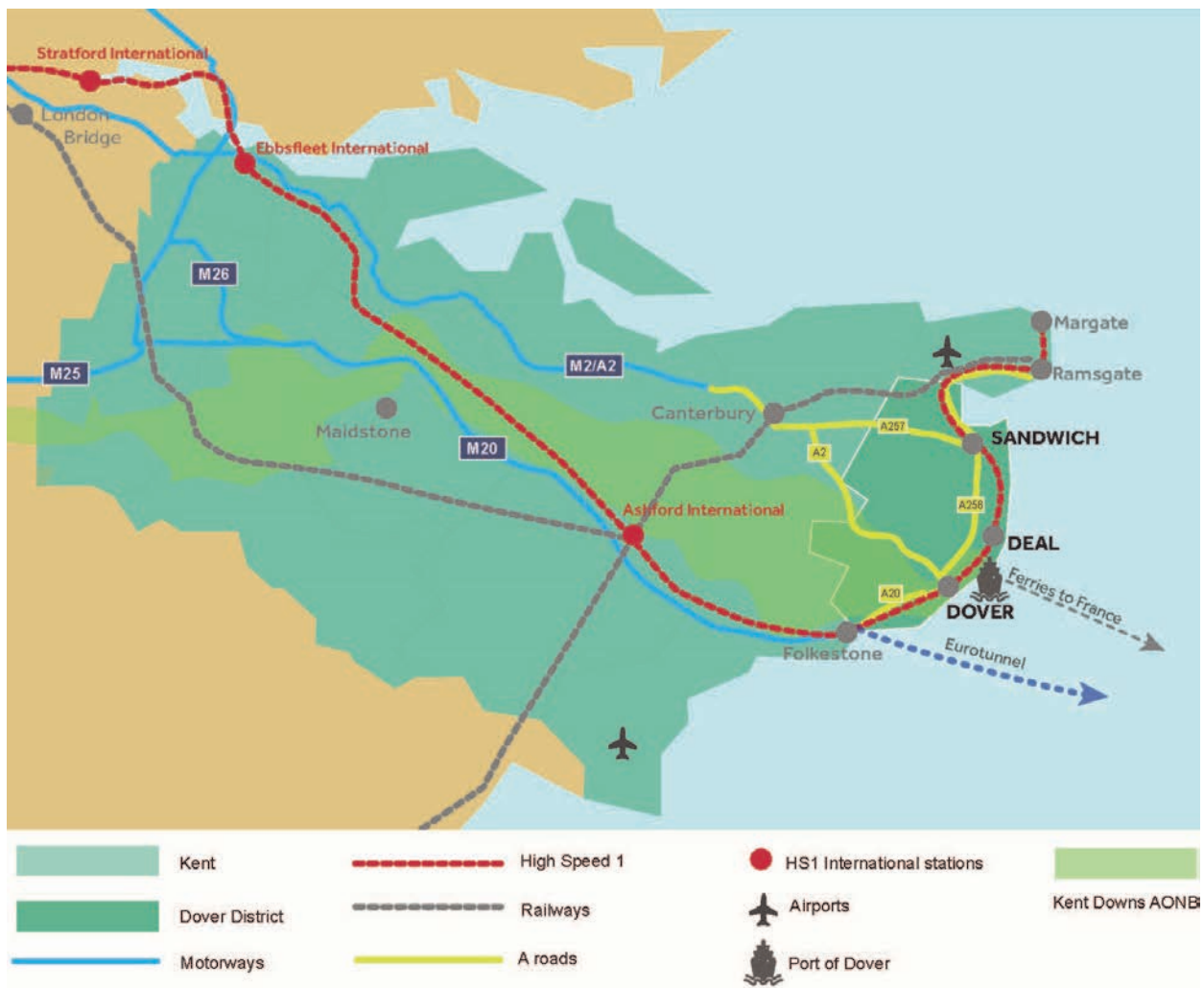


Figure 3.1

## Population

3.4 The most recent (2018) population estimates published by the Office for National Statistics show the population of Dover District to be 116,969 people, consisting of 57,761 males and 59,208 females. The charts below compare the population's gender and age distribution between the 2011 Census and 2018 population estimates, showing that the population of Dover is ageing, with the 70 to 74 age range having

grown the most as a percentage of the total population, while the 40 to 44 and 45 to 49 age ranges have shrunk. The charts also show that a portion of the larger 15 to 19 cohort in 2011 has not been retained into the 2018 20 to 24 and 25-29 categories.

### 3.5 Dover 2011 Gender By Age Pyramid

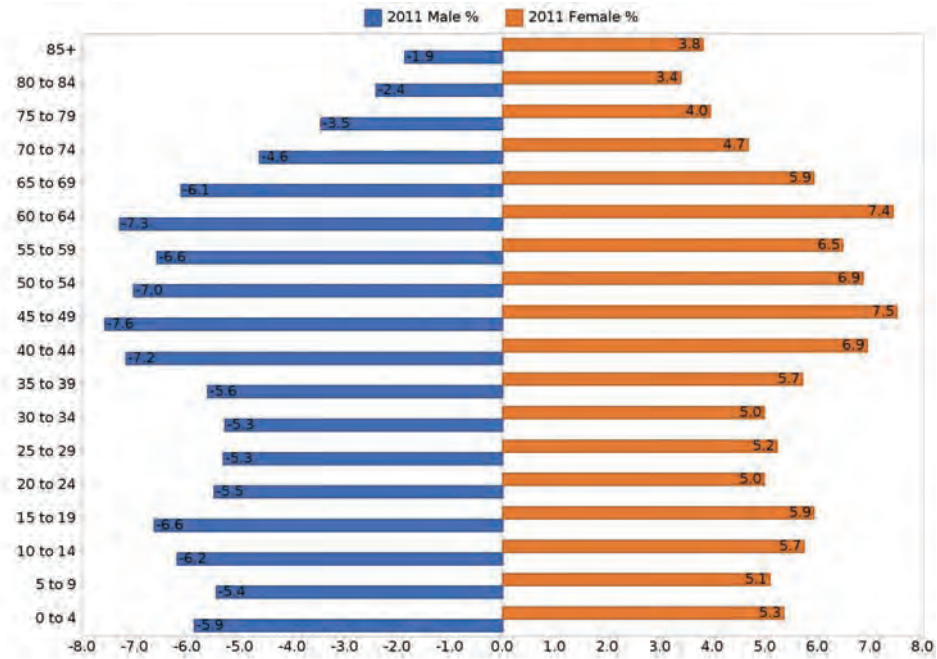


Figure 3.2 Source: Office for National Statistics

### 3.6 Dover 2018 Gender By Age Pyramid

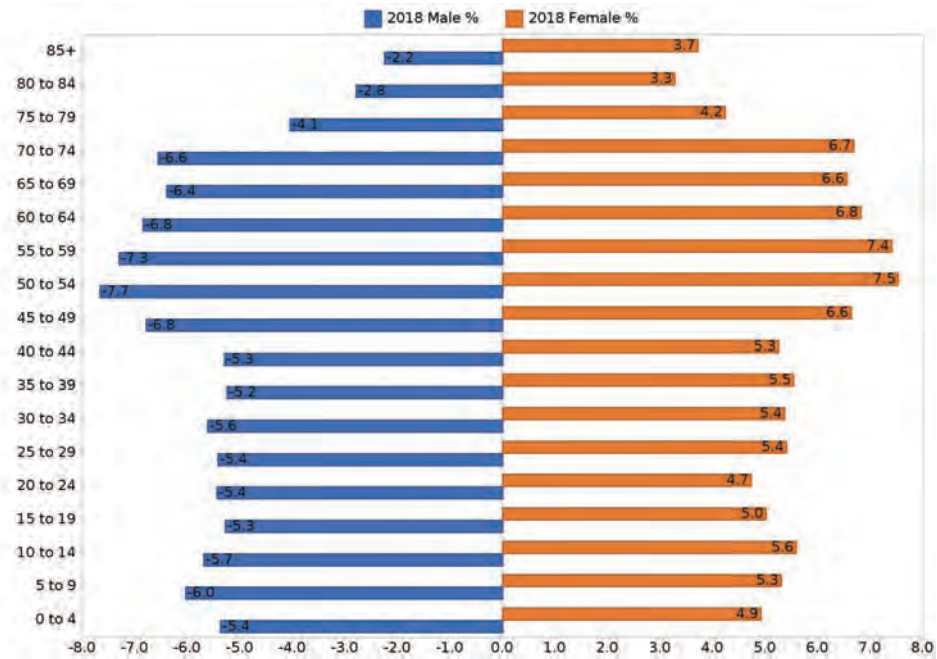


Figure 3.3 Source: Office for National Statistics

**3.7** In the years from 2010-2018 the average total net migration inflow per year was 783 people, and the total cumulative migration was 6,265 people. It can be seen that internal migration grew significantly during the period, making up almost 80% of net migration. This ties in with the 2017 Dover Strategic Housing Market Assessment, which advised that internal migrants to Dover are likely to be middle-aged and older, so as the national population ages the 'origin' population for this movement also increases. The chart below shows the cumulative totals for international and internal migration to Dover District.

### 3.8 Dover District Cumulative Migration

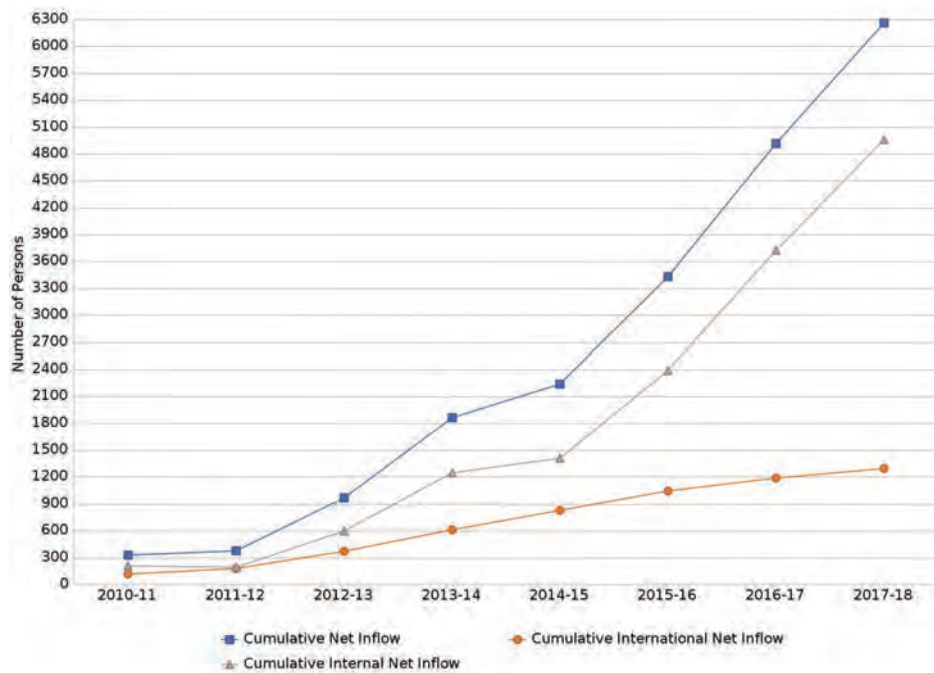


Figure 3.4 Source: Office for National Statistics

## Health

**3.9** The health of people in Dover varies from the England average. Life Expectancy at birth in Dover District is 79.5 years for males and 82.3 years for females, with life expectancy for women being lower than the England average.

**3.10** Life expectancy is 5.9 years lower for men and 4.4 years lower for women in the most deprived areas of Dover District than in the least deprived areas.

**3.11** About 19.4% children live in low income families. In Year 6, 19.1% of children are classified as obese. The rate for alcohol-specific hospital admissions among those under 18 is 22\*. This represents 5 admissions per year. Levels of GCSE attainment (average attainment 8 score) and smoking in pregnancy are worse than the England average.

**3.12** The rate for alcohol-related harm hospital admissions is 485, better than the average for England. Estimated levels of excess weight in adults (aged 18+) are worse than the England average. The numbers of those killed and seriously injured on roads is worse than the England average. The rates of statutory homelessness and violent crime (hospital admissions for violence) are better than the England average.

**3.13** Dover is ranked 107 nationally (1 being the most deprived), out of 317 English local authority districts in the 2019 English Indices of Deprivation, which reinforces previously identified patterns of deprivation across the District. In comparison, Thanet District is ranked 34, Folkestone and Hythe is ranked 84 and

Canterbury is ranked 185. It is clear that Dover District continues to have deprivation 'hot spots' that are among some of the most deprived small areas in the country yet are geographically close to some of the least deprived areas in the country. The Dover Town wards of St Radigund's, Town & Castle and Buckland all contain Lower-Layer Super Output Areas (LSOAs) that fall within the 10% most deprived nationally.

## Climate

**3.14** Nationally, the UK is a signatory of the Paris Agreement (2015) which binds countries to limit global warming to well below 2 Degrees Celsius, while the Climate Change Act 2008 places a legal requirement on the Government to drastically reduce the UK's greenhouse gas emissions by 2050.

**3.15** As a result of this, Dover District Council has acknowledged the serious impact of climate change globally by declaring a Climate Change Emergency in January 2020. This is a step that has also been taken by many other local authorities including Canterbury, Thanet, Folkestone and Hythe and Kent County Council, in recognition of the fact that climate change is a cross-boundary issue and that emissions anywhere affect climate change globally. DDC has also established a cross-party Climate Change member Working Group, which will prepare a strategy and action plan with an aspiration that the Council will become a net zero carbon emitter by 2030, alongside supporting the wider community to enable the District to become carbon neutral by 2050.

**3.16** Dover's Per Capita annual Carbon Dioxide emissions fell from 7.4 tonnes in 2008 (the year The Climate Change Act was passed) to 3.9 tonnes in 2018. The graph below gives the breakdown of carbon dioxide emissions from different sectors in Dover District over the same period, showing that while total emissions reduced by almost half, and industry and commercial CO2 emissions more than halved, emissions from the domestic and transport sectors have been much more resistant to progress.

### 3.17 Carbon Dioxide Emissions By Source From Dover District

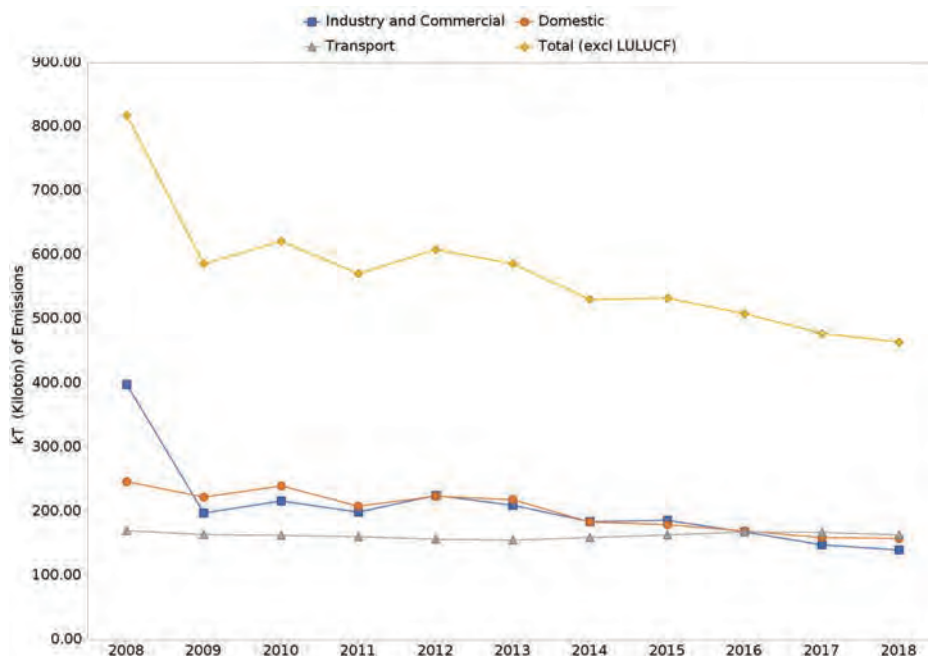


Figure 3.5 Source: Department for Business, Energy and Industrial Strategy 2020

**3.18** The Kent Environment Strategy has identified the County as one of the driest regions in England and Wales, but average water use is higher than the national average (154 litres per person per day compared to 141 litres nationally). Groundwater provides the majority of drinking water for Dover's residents, although

transfers from neighbouring water providers are also relied upon. As the effects of climate change are witnessed, it will be necessary for Dover to make the most efficient possible use of its water sources which are already over-abstracted, often to the detriment of Dover's rivers.

## Housing

**3.19** In 2019 the Ministry for Housing Communities and Local Government (MHCLG) reported that there were 54,514 homes in Dover District, which represents a 6.8% increase from 51,035 in 2010. Over the same period, both Kent and England's dwelling stocks grew at a faster rate, at 8.2% and 6.9% respectively.

**3.20** The Core Strategy and Land Allocations Local Plan allocated land to deliver 14,000 dwellings, with 69% of the projected growth in Dover, 11% in Deal, 4% in Sandwich, 7% in Aylesham and 9% in the rural area.

**3.21** However, between 2010 and 2019 there was an average of 351 net completions per year in Dover, meaning the District is well behind its Core Strategy (2010) target of delivering 10,100 homes between 2006 and 2026, which would have required 505 completions per year. (Source: MHCLG Table 125).

**3.22** Furthermore, the pattern of growth in the District has been significantly different to that envisaged in the Development Plan, with lower levels of growth in Dover (29%) and higher levels in Deal (31%), Aylesham (18%) and the rural area (16%). This is primarily due to the nature of the sites that were allocated in Dover (i.e. more constrained brownfield sites), low land values and the fact that progress on the delivery of 5,750 new homes at Whitfield has fallen significantly behind schedule due to viability and infrastructure issues.

**3.23** Dover District has a similar proportion of its housing stock in private ownership to the county and national averages, while a greater proportion is local-authority owned and a smaller proportion is owned by Private Registered Providers.

	Local Authority (%)	Private Registered Provider (%)	Private Sector (%)	Total Social (LA + PRP)(%)
Dover	7.9	4.9	87.2	12.8
Kent	4.5	8.6	86.7	13.1
England	6.5	10.5	82.6	17.0

Source: KCC Housing Stock 2019 Kent Local Authorities

Table 3.1

**3.24** Dover's dwelling sizes are broadly in line with the Kent and England averages, although a slightly higher proportion of dwellings in Dover have two bedrooms and a slightly smaller proportion have four bedrooms.

**3.25** Average house prices in Dover grew by 55.3% between 2009 and 2019, mirroring County and Regional rises, albeit prices in Dover remain lower than in Kent as a whole and the South East Region. Detached and semi-detached houses in Dover have seen the most growth in price over the last ten years however, with flats and terraces seeing the least.

### 3.26 Average House Prices Comparison

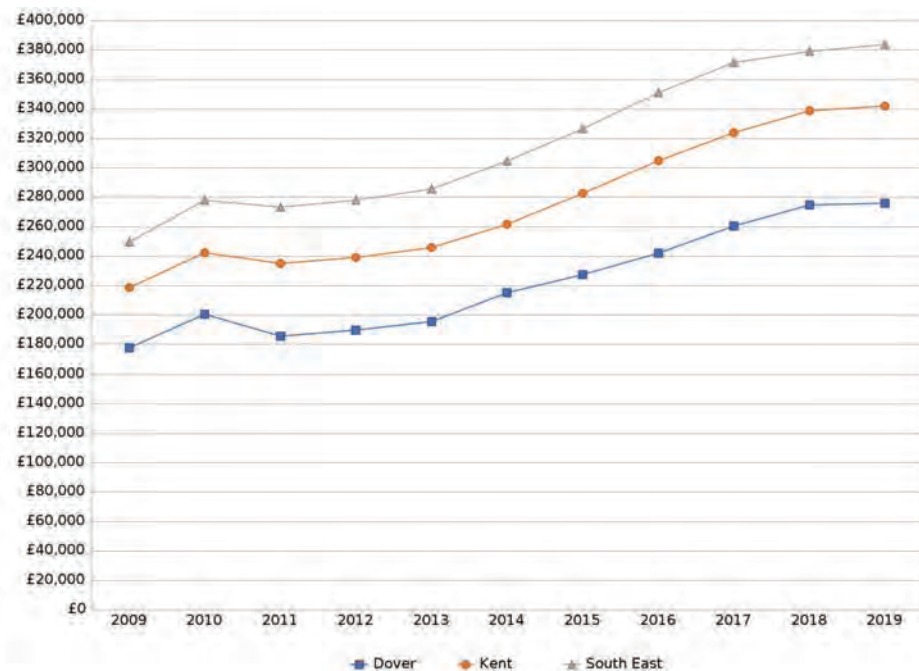


Figure 3.6 Source: HM Registry 2020

**3.27** The lowest property prices in the District are found in Dover Town, while the villages of Alkham and St Margarets to either side of Dover have the highest average sales price when viewed at ward level. Areas of North and Middle Deal are comparatively more affordable than Sandwich and its surrounding villages, while inland areas of the District such as Aylesham and Shepherdswell are also cheaper on average than the majority of the coastal stretch.

**3.28** Dover's proportion of vacant and long-term vacant dwellings is in line with County and national averages, while, as may be expected of a coastal District, there is a higher percentage of second homes than in many other Kent Local Authorities' areas – 2.1% of the stock in 2019 or 1,257 dwellings in total. This figure has increased gently in recent years.

	Vacant Dwellings	Long-term Vacant Dwellings	Second Homes
Dover	1,448	460	1,257
% of Dover stock	2.7	0.8	2.3
Dover 5 yr % change	3.4	5.5	7.6
Kent	17,275	5,370	8,755
% of Kent stock	2.5	0.8	1.3
Kent 5 yr % change	9.4	20.5	8.0
England	648,114	225,845	252,629
% of England stock	2.7	0.9	1.0



	Vacant Dwellings	Long-term Vacant Dwellings	Second Homes
England 5 yr % change	6.2	9.7	0.4
Source: KCC, 2020			

Table 3.2

**3.29** The affordability ratio (the relationship between median house prices and median gross annual work-based earnings) has shown an upward trend over the past ten years, with large increases in 2014 and 2018 followed by a decrease in 2019. The years since 2017 have seen wages in the District increase at a faster pace than average property values, hence the reduction in the affordability ratio in the most recent figures. Dover’s 2019 Strategic Housing Market Assessment Update found that market rents had increased at a similar level to earnings, so as to not alter the housing market dynamics significantly based on the slight reduction in the affordability ratio.

## Economy

**3.30** Dover’s Job Density is significantly lower than that of Kent and the South East region, and apart from Dover the chart below shows overall growth in the job density from 2009-2018, suggesting Dover is being left behind by its neighbours in this regard. The economic recession in the years following 2008 and the resultant withdrawal of Pfizer from the majority of its operations at Discovery Park is likely to be behind the initial shrinkage in Dover’s jobs density, albeit the District has recovered to its original level since then.

### 3.31 Job Density

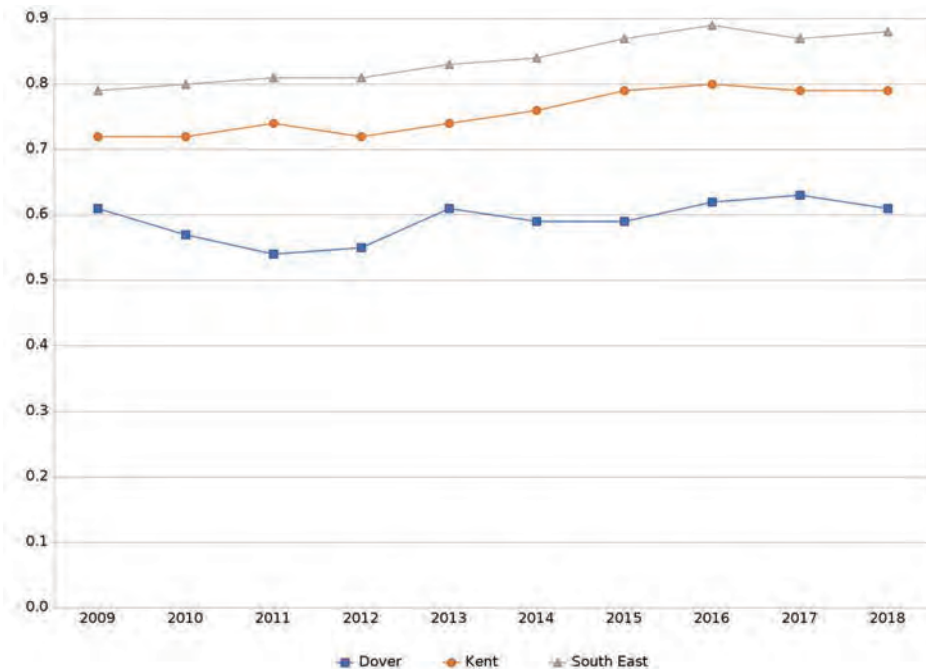


Figure 3.7 Source: NOMIS 2020

**3.32** With regards to job composition, Dover has a far greater proportion of jobs in Transportation and Storage (12.1%), and Public Administration and Defence (6.1%) linked to the presence of Dover Docks, when compared to the average for the South East. Dover also has a comparatively higher proportion of

jobs in Manufacturing (9.1%), and a smaller proportion in Professional, Scientific and Technical Activities (6.8%). Dover's lower proportion of jobs in Administrative and Support Service Activities (4.5%) possibly points to the lack of a large scale private sector employer in the District.

**3.33** Gross weekly pay for the District's residents has fluctuated over the past ten years, with several years of gradual growth, followed by a stagnation in 2013 and then a reduction in 2015. The County and regional average weekly earnings were unaffected by this reduction. However, the last three years have seen strong wage growth in Dover and across the region.

**3.34** With regards to the level of commuting in the District, research conducted in the 2017 Economic Development Needs Assessment concluded that Dover had changed from being broadly balanced in terms of commuting flows in the 2001 Census to being a net exporter of labour by the time of the 2011 Census. Dover's largest commuter outflows are to Canterbury and Folkestone and Hythe Districts, with a significant additional outflow to London, while Dover fits the pattern of the East Kent coastal authorities in being an exporter of labour within the East Kent labour market area (mainly to Ashford and Canterbury districts which are significant net importers).

**3.35** Educational attainment in the District is improving and the percentage of working age people in the District with no qualifications has fallen from 11.1% in 2011 to 7% in 2018. Furthermore, the percentage of people qualified to NVQ4 and above has risen from 26.9% in 2011 to 36.5% in 2018.

**3.36** The percentage of students achieving either Standard or Strong passes in GCSE English and Maths is however lower than the County and national averages, which may go some way to explain the lower levels of students accessing higher education.

## Transport and Infrastructure

**3.37** Dover District is highly accessible by rail, road and sea. It is home to the Port of Dover, which handles 17% (value) of the UK's trade in goods, and the District also has high speed rail connections to London via HS1 from Dover, Martin Mill, Walmer, Deal and Sandwich. It is strategically positioned at the start of the A2 and A20 giving it great links to Kent and beyond. Links to surrounding districts are provided by the A256 to Thanet and A257 to Canterbury and the A258 connects Dover, Deal and Sandwich.

## Natural Environment

**3.38** Dover District enjoys spectacular landscapes and coastlines which encompass coastal chalk cliffs, salt marshes and mud flats, rolling chalk downs, ancient woodlands and expansive arable farmland. Dover's wealth of natural assets are valued and protected at local, regional, national and international level, and provide significant environmental, social and economic benefits for residents and visitors alike. These assets include five internationally protected sites, two national nature reserves, Kent's only stretches of Heritage Coast, five SSSIs, two Marine Conservation Zones and the extensive chalk grasslands of the AONB covering nearly a quarter of the District. Dover's natural environment is rich in biodiversity, priority habitats and protected species.

**3.39** In addition to its 'protected' sites, Dover's residents are able to benefit from access to a range of Green Infrastructure sites including Connaught Park in Dover and Victoria Park in Deal, the popular Samphire Hoe Nature Reserve on the outskirts of Dover, the Abbey and Gardens at Kearsney, beaches at Sandwich, Deal and Dover, numerous other green sports facilities and the Gazen Salts Nature Reserve at Sandwich. Clifftop walks can be enjoyed eastwards of Dover towards Kingsdown and westwards towards Capel le Ferne, while Betteshanger Country Park near Deal provides opportunities for cyclists and dog walkers on an expanse of land reclaimed from previous mining activities.

## Historic Environment

**3.40** Dover District enjoys a particularly significant archaeological and historical heritage, in part due to its strategic location as a gateway from Europe to southern England. In total Dover is home to almost 2,000 listed buildings, 48 Scheduled Ancient Monuments, 57 Conservation Areas and 12 museums.

**3.41** Dover's historic assets include those of national and international importance such as the Roman Lighthouse overlooking Dover and the Norman Castle established by William the Conqueror in the 11th Century. There are also Tudor Castles at Deal and Walmer, the medieval town and walls in Sandwich and the Napoleonic and World War period's defences at Dover's Western Heights and Fort Burgoyne. Dover, Deal and Walmer Castles and Dover Western Heights are maintained by Historic England, and as such public access is possible, while access to Fort Burgoyne is limited because The Land Trust are undertaking conservation works on the site.

**3.42** Inland, Dover is rich in historic villages of agricultural origins, many with flint and brick churches dating back to the Anglo Saxon and Norman periods. The area's coal mining legacy is visible through the many surviving buildings of that era in the north and west of the District, most notable of which is the village of Aylesham, designed in the 1920s based on Garden Settlement principles by Sir Patrick Abercrombie, the architect of the post-war London Plan.

**3.43** Dover also contains a cluster of historic Country Houses and Estates, such as those at Goodnestone, Knowlton, Northbourne, Waldershare, Betteshanger and Fredville – many of which developed from medieval manors mentioned in the Domesday Survey and are often connected to leading architects such as Lutyens, Devey and Blomfield. The principal country houses in the District all have a current use, although they are generally in private hands and therefore inaccessible to the public.



4

Vision and objectives

**4.1** This chapter sets out a bold new vision for Dover District in 2040, and a number of supporting strategic objectives.

## Overarching Vision

**4.2** Dover District in 2040 will be a place of aspiration, providing outstanding opportunities for sustainable living. Through careful stewardship of its world class landscapes and wealth of historic sites, it will be a destination of choice for people of all ages to make their home, for businesses to invest in and for visitors to explore and experience. Community spirit will be strong amongst the residents of the district, with an increased sense of health and wellbeing.

## Prosperous Economy

**4.3** The local economy will be prosperous and diverse, harnessing the world class potential of Discovery Park and building upon key sectors of life sciences, pharmaceuticals, manufacturing and logistics, as well as local entrepreneurial talent. The District will have attracted new businesses of all scales, with 21<sup>st</sup> century infrastructure, unrivalled transport connections with London and Europe, alongside home working facilities.

**4.4** Dover will be a district that visitors want to spend time in, taking advantage of a diverse range of high-quality accommodation, attractions and unique experiences building upon the globally important Dover Castle and the iconic White Cliffs.

## Vibrant Communities

**4.5** New developments will blend seamlessly with the existing townscapes to embody the best of local distinctiveness and will have created places that are well-designed and well-built. Built to local design codes, they will respect the spectacular natural environments and rich heritage of the District. New housing will enhance towns and villages, delivering a balanced and resilient housing market, a supply of new homes that meets people's needs and where affordable and local housing is prioritised.

**4.6** Residents will have access to healthy lifestyle opportunities that the district's high-quality countryside and maritime landscapes provide, including extensive and attractive public green spaces and an enhanced network of dedicated walking and cycling routes, as well as improved educational opportunities and leisure and community services.

## Thriving Places

**4.7** Dover town will be thriving, with a strong core of local shops and services, a flourishing port, and regenerated areas of existing housing. Sensitive restoration of elements of its rich heritage, will enhance the attractiveness of the town, while improved connections to its seafront will have been delivered by high quality design and investment in place making.

**4.8** The distinctive historic environments of the towns of Deal and Sandwich will be protected and enhanced, their economies benefiting from a wide range of local businesses and services as well as investment in culture.

**4.9** The rural villages of the District will continue to enrich the landscapes here, with improved community facilities and housing opportunities, enabling more young people to stay and contribute to the communities where they grew up.

## Spectacular and Sustainable Environment

**4.10** Above all, its enviable countryside and coastal environments will define the district. The climate change emergency will have delivered increased opportunities for local food production, extensive tree planting, and the adoption of sustainable design and construction methods. From the iconic White Cliffs

to the nationally valued chalk downlands of the Kent Downs AONB, habitats will have been protected and enhanced. Air quality and biodiversity will have been improved, as the District achieves significant progress to becoming net zero carbon.

## Strategic Objectives

**4.11** The vision for the Dover Local Plan 2040 is supported by strategic objectives. These follow the main themes within the vision, with the addition of cross-cutting objectives, and are linked to specific chapters within the plan.

### Prosperous Economy

- To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.
- To support opportunities to strengthen the role of Dover, Deal and Sandwich Town Centres through their diversification, enhancement and improvements to the public realm.
- To provide a range of high-quality tourism facilities and accommodation, which facilitate the growth of the tourism sector, and encourage longer staying visits.

**4.12** These strategic objectives relate to the following Local Plan Chapters: Employment and the Local Economy, Retail and Town Centres and Transport and Infrastructure..

### Vibrant Communities

- To provide greater choice of high-quality housing to meet the needs of Dover District's growing population and changing demographic, and address affordability issues.
- To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.
- To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which promote local distinctiveness and a sense of place.
- To provide new and improved community infrastructure and assets, including open space and sports facilities to meet the needs of the District's communities.

**4.13** These strategic objectives relate to the following Local Plan Chapters: Housing, Design and Transport and Infrastructure.

### Spectacular and Sustainable Environment

- To respond to the challenges of climate change, ensuring new development is resilient to, and mitigates against the effects of climate change, including by reducing carbon emissions, and designing development that is resilient to the effects of climate change.
- To manage flood risk sustainably in a way that ensures the safety of residents and property, and take opportunities to reduce flood risk where possible.
- To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and their positive role in regeneration of the District.
- To conserve and enhance the district's biodiversity, including all designated wildlife sites and priority habitats and to enhance ecological connectivity between them, delivering a net gain in biodiversity.

- To conserve and enhance the District's important natural landscapes and water environments, to ensure these assets can continue to be experienced and valued by residents and visitors and are protected from inappropriate development.
- To ensure the District's natural resources are used prudently, waste is minimised, and environmental pollution is reduced or avoided.

**4.14** These strategic objectives relate to the following Local Plan Chapters: Climate Change, Natural Environment and the Historic Environment.

### Cross Cutting Issues

- To support improvements in the health and wellbeing of residents, improve quality of life for all and reduce health inequalities.
- To improve connectivity and movement through significantly enhancing the provision of sustainable modes of transport and delivering improvements to the local and strategic road network.
- To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.
- To work with the Council's partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District's people and places.

**4.15** These strategic objectives relate to the following Local Plan Chapters: Transport and Infrastructure and Natural Environment.

# Dover District Key Diagram

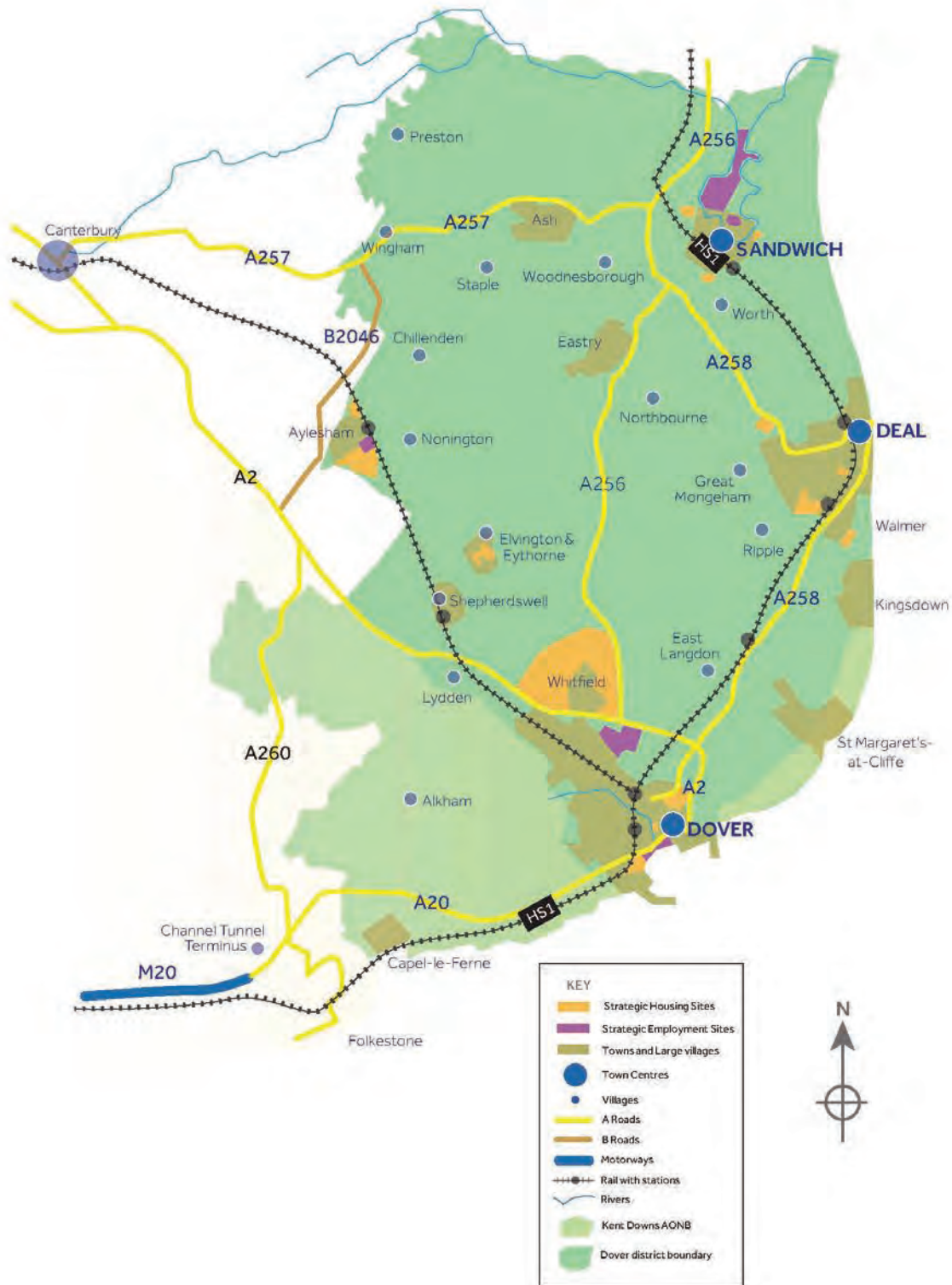


Figure 4.1





5

Climate change

**5.1** This chapter sets out the Council's strategy for the mitigation of, and adaptation to, climate change, and covers:

- What the key issues are in relation to the mitigation of, and adaptation to, climate change;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Planning for climate change;
  - Reducing carbon emissions;
  - Sustainable design and construction;
  - Renewable and low carbon energy;
  - Sustainable transport;
  - Water resources, flood risk and coastal change; and
  - Carbon sequestration.

## What are the key issues to consider?

**5.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to the mitigation of, and adaptation to, climate change:

**5.3** The Climate Change Act 2008 (as amended) sets a legally binding target to bring all green house gas emissions to net zero by 2050. In line with this, the Council has declared a climate emergency with the intention of delivering a carbon neutral District by 2050.

**5.4** Section 19(1A) of the Planning and Compulsory Purchase Act 2004 stipulates that development plan documents must (taken as a whole) include policies designed to ensure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change. Furthermore, the NPPF (2019) states that Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. The Council therefore has a legal duty to consider the mitigation of, and adaptation to, climate change as part of the Local Plan.

**5.5** It is however important to recognise that planning is just one tool for addressing climate change, and it will therefore be important for us to work with our partners, and join with other strategies, to tackle climate change in a co-ordinated way, in order to have maximum effect.

## Reducing Carbon Emissions

**5.6** The governments proposed 2025 Future Homes Standard (FHS) was consulted on in late 2019 and early 2020. The aim of the FHS is to tighten the standards on energy efficiency and ventilation in new homes from late 2020 to bring the Building Regulations in line with the EU's Energy performance of buildings directive, to facilitate the delivery of homes that meet the FHS by 2025. The consultation sets out two approaches to achieve this. Given the outcome of this consultation is unknown, a key issue for the Council is whether it should adopt the governments preferred approach at this stage, or wait for this to be clarified.

**5.7** The government is also proposing to amend Part L2 of the Building Regulations covering non-domestic buildings, however this consultation is yet to be published.

## Sustainable Design and Construction

**5.8** The NPPF (2019) states that Plans should take into account the risk of overheating from rising temperatures. There are two types of overheating - the overheating of buildings, whereby the internal environment of a building becomes uncomfortably hot; and the wider scale overheating that occurs through the urban heat island effect. Overheating is likely to become a more frequent problem because of climate

change, but also because of improvements to energy efficiency standards. Given this, design interventions will be required to allow passive cooling. Green and blue infrastructure will play an important role in this, as they can be used to both reduce heat build-up and allow ambient heat to escape. Urban trees can also provide shading that cools surfaces and reduces ambient air temperature through evaporation of water via the leaves.

**5.9** A building's carbon emissions can also result from indirect sources, such as the energy used to extract, grow or manufacture building materials, to transport materials and people involved in construction, and the energy used during construction. These emissions are often referred to as "embodied carbon". As the operational carbon produced by buildings falls due to improving energy efficiency standards and a decarbonising energy supply, addressing embodied carbon emissions is likely to become more and more critical if carbon emissions are to continue to fall. Embodied carbon is not addressed by the building regulations. Given this it will be necessary to address this issue in a policy in the Plan.

**5.10** Sustainable design and construction measures can often increase the cost of development. The provision of future homes standards and sustainable design and construction may need to be balanced against other priorities such as the provision of affordable housing, due to the potential impact upon development viability.

## Renewable and Low Carbon Energy

**5.11** Under legislation, Local planning authorities are responsible for planning applications for renewable and low carbon energy development of 50 megawatts or below. Planning applications for developments above this size are the responsibility of the Secretary of State for Energy. However it is the government's intention to amend legislation so that all applications for onshore wind energy development are handled by local planning authorities.

**5.12** The NPPF (2019) is positive about low carbon energy developments and requires plans to "provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts)", "consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure" and "identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers" (paragraph 151). The Council will therefore need to consider whether in addition to having a policy to manage the development of renewable and low carbon energy infrastructure in the District it is also necessary to allocate sites to deliver these schemes.

## Sustainable Transport

**5.13** The NPPF (2019) states that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes, and that Plans should identify opportunities to promote walking, cycling and public transport use. We need to adopt a policy approach that seeks to reduce the reliance on the car through the provision of a range of 'smarter' sustainable transport options to give people the choice to not use their car for every journey, which will enable people to live healthier and more sustainable lives, whilst also cutting the amount of private car use, traffic and resultant pollution. The Plan will also need to help people engage in more active forms of travel (i.e to walk and cycle more) as part of their daily travel routine. This needs to be facilitated in two ways: first through the provision of high quality public realm and landscape design, to create streets where people can enjoy walking, cycling or just spending time; and secondly through the provision of more walking and cycling networks and supporting facilities.

**5.14** The NPPF (2019) recognises however that opportunities to maximise sustainable transport solutions will vary between urban and rural areas. In respect of Dover, the District has a large rural area and a quarter of the existing residents live in rural villages and countryside, where there is significant reliance on the use of the private car and public transport options are limited. Initiatives which encourage the use of public transport over the use of the private car should be supported alongside opportunities for active travel.

## Water Resources, Flood Risk and Coastal Change

**5.15** Water resources are renewable but not unlimited, and our District is one of the most water scarce areas in the UK. Given climate change forecasts and population increases, this situation is likely to worsen.

**5.16** The risk of flooding within the district is diverse; the coastal settlements of Sandwich, Deal and Dover are all shown (to some degree) to be at risk of flooding from the sea, with the River Stour and River Dour presenting a fluvial risk of flooding to the settlements bordering these rivers. The centre of the district is in parts low lying, and the varied topography throughout the district can present a risk of surface water flooding to both rural and urban communities alike. The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere. Given this, it is important that the Council actively manages this risk through the planning process to ensure that new development takes into consideration the impact of future climate change and is designed to mitigate risk.

**5.17** Flooding from surface water runoff typically occurs following an extreme rainfall event, where water from higher in the catchment flows overland and accumulates in topographic depressions. This is further exacerbated in areas with steeply sloping topography, low permeability ground conditions (e.g. urban areas), or where the surface water drainage system (e.g. highway gullies) are overwhelmed. The Strategic Flood Risk Assessment (2019) highlights a number of areas in the District that are susceptible to surface water flooding and it is likely that this will be further exacerbated by the extreme weather events associated with climate change. Given this it will be necessary to include mechanisms in the Plan to manage surface water in a sustainable manner, primarily through the use of Sustainable Urban Drainage Systems (SuDS), to reduce the risk of flooding through reducing surface run off rates on site or elsewhere within the catchment.

**5.18** Global sea levels will continue to rise, depending on greenhouse gas emissions and the sensitivity of the climate system. The reliance of villages and towns (such as, Deal and Sandwich) on tidal flood defence infrastructure will increase over the next century as sea levels increase. The consequences of such structures failing (i.e. a breach), or becoming overtopped, will therefore increase too. Given this, there is a need to reduce the risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast.

## Carbon Sequestration

**5.19** Carbon sequestration is the process of capturing and storing atmospheric carbon dioxide. It is one method of reducing the amount of carbon dioxide in the atmosphere with the aim of reducing climate change. Methods of carbon sequestration include tree planting, provision of green corridors, encouraging bio-diversity, and re-wilding.

**5.20** Tree planting is recognised by the Government as being one of the main ways the UK can achieve carbon neutral status by 2050. We need to consider how we can promote tree planting in the District to help meet this target.

## How could these be addressed through planning policy and what is our preferred approach?

5.21 Policy options include:

### Planning for Climate Change

5.22 Dover District Council declared a climate change emergency on the 4<sup>th</sup> November 2019 and has committed to preparing a Climate Change Strategy and associated Action Plan. The Council also has an ambition to become a net zero carbon emitter by 2030 at the latest.

5.23 Setting out clearly in a strategic policy what the climate emergency declaration means for the Local Plan and how it will be reflected in and shape all policies is therefore considered important, and not doing so would be unreasonable in light of the strategic objectives of the Draft Local Plan.

### Reducing carbon emissions

- The council can either adopt the lower Future Homes Standard: a 20% reduction in carbon emissions compared to the current standard for an average home, delivered through very high fabric standards (typically with triple glazing and minimal heat loss from walls, ceilings and roofs); or
- Adopt the governments preferred Future Homes Standard: a 31% reduction in carbon emissions compared to the current standard, delivered through better fabric standards, though not as high as in option 1 (typically double not triple glazing), and the installation of clean electricity generation technology such as photovoltaic (solar) panels and a choice of renewable or low carbon energy technology which could include: photovoltaic panels; wind turbines; solar thermal panels; air or ground source heat pumps; anaerobic digestion; combined heat and power plants; and biomass boilers; or
- Require the full 2025 Future Homes Standard to be delivered now; a 75-80% reduction in carbon emissions compared to the current standard; or
- Consider a phased approach to the introduction of the 2025 Future Homes across the Plan period; or
- Set an alternative local target for reducing carbon emissions, which focuses on the use of a decentralised energy supply; or
- Require all new homes to be built to achieve net zero carbon. Where it can be demonstrated this cannot be delivered on-site, developers would then be expected to pay into a carbon off-set fund. This fund would be administered by the Council;
- Not set out the council's preferred policy approach until the results of the Future Homes consultation are known; or
- Instead rely on the National Planning Policy Framework, Planning Practice Guidance and the National Technical Standards when providing determining planning applications for development in the District.

5.24 The governments preferred option is to deliver a 31% reduction in carbon emissions through the Future Homes Standard, as they consider it would support the move away from reliance on fossil fuels, deliver more carbon savings and result in lower bills for the householder, whilst acknowledging it has higher build costs. Furthermore, the government is also considering removing the ability for a Local Authority to set higher efficiency standards for homes. Given this, the Council feels that it is appropriate to adopt the governments proposed approach, as set out in option 2 above, in the Local Plan. This has been tested within the Local Plan Viability evidence, and considered to be deliverable when taken in combination with other policy requirements, including affordable housing.

5.25 With regards to reducing carbon emissions from non-residential dwellings, policy options include:

- Continuing with the existing approach that is set out in the Core Strategy which requires new non-residential development to meet BREEAM very good standard. This rating is given to the top 25% of buildings and is considered to represent advanced good practice in sustainability performance; or
- Require new non-residential development to meet BREEAM excellent standard. This rating is given to the top 10% of buildings and is considered to represent best practice in sustainability performance; or
- Rely on the National Planning Policy Framework, Planning Practice Guidance and the National Technical Standards when providing determining planning applications for development in the District.

**5.26** The council's preferred approach is to continue to require non-residential development to meet BREEAM Very Good, instead of requiring higher standards of sustainability, which may place an undue burden on the viability of new commercial development in the District. This has been tested within the Local Plan Viability evidence, and considered to be deliverable when taken in combination with other policy requirements, including affordable housing.

## Sustainable design and construction

- With regards to promoting sustainable design and construction in the District, the council can either adopt a local approach to managing this issue and include a policy in the Plan to facilitate the delivery of sustainable design and construction to reduce greenhouse emissions in relation to all new development; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

**5.27** Sustainable design and construction can make an important contribution to delivering sustainable development and addressing climate change. Given this, having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a policy on sustainable design and construction to assist in the delivery of the Council's target of achieving net zero carbon by 2050. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Renewable and low carbon energy

- With regards to promoting renewable and low carbon energy in the District, the council can either adopt a local approach to managing this issue and include a criteria based policy in the Plan to facilitate the delivery of local renewable and low carbon energy to reduce greenhouse emissions; or
- Allocate sites in the Local Plan to deliver renewable and low carbon energy schemes. For example, the KCC Renewable Energy Action Plan for Kent (2013) identifies the central areas of Dover District as having a high potential for large scale installation of wind energy; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

**5.28** Increasing the proportion of renewable and low carbon energy generated is one of the ways Dover District can contribute to the UK governments target of net zero greenhouse gas emissions by 2050. Given this, having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a policy on renewable and low carbon energy to assist in the delivery of this target. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

**5.29** If the council were to allocate sites for renewable energy in the District then further evidence would be required. However currently no specific sites have been put forward for renewable energy installations.

## Sustainable Transport

- With regards to promoting sustainable transport in the District, the council can either adopt a local approach to managing this issue and include a policy in the Plan to ensure that new development provides the opportunity to maximise the use of the sustainable transport modes of walking, cycling, and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.
- A further option would be to specify the individual sustainable transport measures which should be provided on each allocation.

**5.30** The option to not have a specific policy covering this issue, but to consider planning applications against the NPPF and Planning Practice Guidance, is considered to provide an insufficient level of guidance for applicants and officers. Given this, having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a policy on sustainable transport and this is set out below. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Water resources, flood risk and coastal change

- With regards to water efficiency, the council can either adopt the minimum standard in the National Technical Standards and Building Regulations of 125 litres/person/day; or
- If the Council has sufficient evidence it can require new dwellings to meet the tighter building regulations optional requirement of a maximum usage of 110 litres/person/day.

**5.31** Given the we have clear evidence that Dover is in a water stress area, we consider it is most appropriate to adopt the second option in the Plan, and this is reflected in our preferred policy approach set out below. This option has been tested through the Whole Plan Viability evidence and is considered to be deliverable.

- In respect of flood risk, surface water management and coastal change the council can either adopt a local approach to managing these issues and include policies in the Plan to ensure that flood risk and coastal change is managed effectively and sustainably as part of the planning process; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

**5.32** Given the Strategic Flood Risk Assessment (2019) highlights that a number of areas in the District are at risk of flooding from a variety of different sources we feel that the first option is most appropriate, as it allows the Council to effectively manage this issue at a local level through the policies in the Local Plan, and this is reflected in our preferred policy approach set out below.

## Carbon Sequestration

- The council can either adopt a local approach to managing this issue and include policies in the Plan to facilitate the delivery of more trees to sequester carbon from the atmosphere to help address climate change; or
- Have no specific requirement concerning carbon sequestration.

**5.33** Tree planting is recognised by the Government as being one of the main ways the UK can achieve carbon neutral status by 2050. Given this, we feel that it is appropriate to support this initiative at a local level through the introduction of a policy to facilitate tree planting and protection. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. This will however be tested through the council's viability work to support the Local Plan.

## Draft policies and supporting text

**5.34** Our preferred policy approach to addressing climate change in the District over the Plan period, and the justification for this, is set out below:

### Planning for Climate Change

**5.35** Climate Change – the rise in average global temperature due to increasing levels of greenhouse gases in the earth's atmosphere – is a fundamental challenge facing the world. There is mounting evidence of its seriousness and its potential impacts. Without action, it could have a catastrophic on our planet and the people and wildlife that inhabit it.

**5.36** The Local Plan is intended to support the Council's strategy on climate change particularly in relation to the built environment.

**5.37** Strategic Policy 1 sets out the Councils overarching strategy for addressing climate change and delivering a carbon neutral District by 2050. This policy is underpinned by a number of Development Management Policies which set out a comprehensive approach to mitigating and adapting to climate change.

**5.38** These policies should be read in combination with other policies in the Plan, as the issue of climate change is a key theme that runs through each chapter and is central to the economic, social and environmental dimensions of sustainable development, as set out in the NPPF.



## Strategic Policy 1 Planning for Climate Change

All new development must contribute to the mitigation of, and adaptation to, climate change by:

### Mitigation

- Promoting low carbon design approaches to reduce energy consumption in buildings;
- Utilising sustainable construction techniques and optimising resource efficiency;
- Providing opportunities for renewable and low carbon technologies;
- Providing opportunities for decentralised energy and heating;
- Maximising green infrastructure; and
- Reducing the need to travel and maximising opportunities for 'smarter' sustainable transport options to deliver the highest possible share of trips by the most sustainable travel modes.

### Adaptation

- Ensuring that development is designed to reduce vulnerability to, and provide resilience from, the impacts arising from a changing climate, whilst not increasing the potential for increased greenhouse gas emissions in doing so;
- Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;
- Maximising water efficiency; and
- Ensuring that development does not increase flood risk and where possible reduces the risk of flooding.

## Reducing Carbon Emissions

**5.39** New and existing homes produce around 20% of all carbon emissions in the UK. As part of the efforts to meet the UK's ambitious target to reduce greenhouse gas emissions to net zero by 2050 the government is proposing to introduce the Future Homes Standard in 2025. The government considers that this will require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency.

**5.40** Through the introduction of the Future Homes Standard the government anticipates that an average home will have 75 - 80% fewer carbon emissions than a home constructed to the current national standards for energy efficiency. This, along with the Clean Growth Grand Challenge mission to halve energy use in all new builds by 2030, will set a path towards decarbonisation of new homes and support the scaling up of low carbon technologies to decarbonise the existing housing stock.

**5.41** The Future Homes Standard sets out a road map for delivery, and this policy will be implemented on a phased basis in accordance with the guidance in the Future Homes Standard.

**5.42** Non-domestic buildings will continue to be required to meet the BREEAM standard, which is the most commonly accepted assessment tool by which to judge and require increased sustainability standards in new non-domestic developments, until the government publishes its proposals to amend Part L2 of the Building Regulations to deal with this issue.

## DM Policy 1 Reducing Carbon Emissions

All new development must incorporate design features that deliver a reduction in carbon emissions.

In line with the Future Homes Standard residential dwellings must achieve a 31% reduction in carbon emissions below the Target Emission Rate (TER) as set out in Building Regulations Part L (2013).

This will be achieved using the measures set out below:

- 1 An increase in fabric standards to deliver a 'fabric first' approach to new development; and
- 2 The use of on-site renewable and low carbon energy technologies.

Non domestic dwellings must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum energy efficiencies under the energy credits.

All development proposals must submit an Energy Statement to the Council to demonstrate how the policy requirements above have been complied with.

### Sustainable Design and Construction

**5.43** Sustainable design and construction can make an important contribution to delivering sustainable development and addressing climate change. Measures for achieving this include:

- Building orientation to maximise summer cooling through natural ventilation in buildings and increasing passive solar gain.
- Using suitable sustainable construction techniques in new developments to make them more efficient.
- Planning for buildings to have a longer life, incorporating flexibility into building design so that buildings can be adapted to suit the changing lifestyles and home occupation patterns of residents and users.
- Planning for weather changes by including adaptations like better drainage systems and rainwater harvesting.
- The provision of green infrastructure to provide providing cooling effects, retention of water, the absorption of carbon dioxide (CO<sup>2</sup>) and, the opportunity for sustainable grown local food in urban and settlement areas. Green infrastructure can also provide an important ecological role and encourage walking, cycling and other recreational activities.
- The provision of adequate space for recycling and composting.

**5.44** Many sustainable design features have multiple benefits; for example, green roofs that enhance biodiversity, absorb rainfall, improve the thermal and acoustic performance of the building, reduce the urban heat island effect, and improve the appearance of a development. Similarly, the use of appropriate construction materials is also key and, where practicable, those sourced locally and with low embodied energy should be prioritised in order to both support the local economy and reduce emissions from both manufacturing and transport.

**5.45** Sustainable design should also recognise that demolition and rebuild is not always appropriate, and that structurally sound buildings should be reused in preference to demolition.

**5.46** With large proportions of a building's carbon footprint and environmental impact being created before occupation begins, sustainable construction methods are a key consideration. For this reason, it is important that the environmental assessment of a development includes not only the operational stage of a building's life when it is in use, but also considers construction activities such as the production and transportation of materials.

5.47 Further guidance on good design principles is provided in Strategic Policy 15 and DM Policies 36 and 37 in the Plan. To support the delivery of high quality buildings and places in the District the Council will also produce a Local Design Guide to provide clear and detailed guidance in relation to sustainable design and construction measures.

## DM Policy 2: Sustainable Design and Construction

All development must:

- i Utilise layout, orientation, massing and landscaping to make the best use of solar energy passive heating and cooling, natural light and natural ventilation;
- ii Prioritise the use of low embodied carbon and energy efficient building materials and construction techniques;
- iii Consider the lifecycle of the building and public spaces, including how they can be easily modified to meet changing social and economic needs and how materials can be recycled at the end of their lifetime;
- iv Provide measures to adapt to climate change, such as the provision of water efficiency measures in accordance with DM Policy 5, green infrastructure in accordance with DM Policies 9, 31 and 36 and Strategic Policies 15 and 17, sustainable drainage systems (SuDS) in accordance with DM Policy 7, suitable shading of pedestrian routes and open spaces, opportunities for locally grown food produce, rainwater harvesting and drought resistant landscaping; and
- v Minimise waste and promote recycling, during both construction and occupation.

## Renewable and Low Carbon Energy

**5.48** The delivery of local renewable and low carbon energy can reduce greenhouse gas emissions, help ensure fuel security, stimulate investment and potentially provide some income for communities. Even small-scale projects can contribute towards cutting greenhouse gas emissions. Increasing the proportion of renewable and low carbon energy generated is one of the ways Dover District can contribute to the UK governments target of net zero greenhouse gas emissions by 2050.

### DM Policy 3 Renewable and low carbon energy

Developments for renewable and low carbon energy will be supported where applicants can demonstrate that:

- i They have considered the environmental, social and economic benefits of their proposals;
- ii There are no significant adverse impacts on the surrounding area such as visual, noise and amenity;
- iii Visual impacts have been minimised in the design and layout of the scheme;
- iv There is no significant loss of residential amenity of local residents;
- v There is no adverse impact on heritage assets;
- vi There is no significant impact on the landscape setting, habitats, biodiversity or wildlife (particularly protected species);
- vii The proposals can conserve and enhance the natural environment through measures such as biodiversity off-setting;
- viii They do not have an impact on the best and most versatile agricultural land unless that it can be demonstrated that it is necessary and no alternative lower grade land is available;
- ix They minimise impact on the local transport network;
- x They will source sustainably any fuel required;
- xi They will maximise opportunities to address the energy needs of neighbouring uses; and
- xii They do not lead to a substantial increase in cumulative impacts within an area.

## Sustainable Transport

**5.49** The planning process for new developments provides the opportunity to maximise the use of the sustainable transport modes of walking, cycling, and the use of public and community transport, and opportunities for people with disabilities to access all modes of transport. This is consistent with the NPPF and supports Strategic Policy 1 (Planning for Climate Change) to discourage the use of the private car.

**5.50** The measures applicable to each development proposal will vary on a case-by-case basis, including according to the type and scale of development proposed, its location, and the level of existing transport infrastructure and services in the immediate area. This could also include a financial contribution for the implementation of schemes beyond the scope of an individual development to deliver.

**5.51** Initiatives which encourage the use of public transport over the use of the private car will be supported alongside opportunities for active travel. This will include continued support for Dover Fastrack connecting Whitfield with Dover town centre and Dover Priory railway station, and supporting the development of demand responsive public transport initiatives to serve the districts more rural areas.

## DM Policy 4 Sustainable Travel

Development must, in so far as its size, characteristic and location:

- i Be designed so that opportunities for sustainable transport modes are maximised and provide for a variety of forms of transport as alternatives to travel by private vehicle;
- ii Give priority to the needs of pedestrians, cyclists, users of public transport, car sharers and users of low and ultra-low emission vehicles;
- iii Be readily accessible by sustainable transport modes through the provision of high-quality, safe and direct walking and cycling routes within a permeable site layout;
- iv Provide one charging point for every new dwelling with parking provision within its curtilage which as a minimum provides cabling to enable subsequent installation of 7kW 32amp OLEV compliant wall or ground mounted charge point.; or for all other types of residential, commercial, industrial and retail development, provide one electric car charging point for every 10 parking spaces provided;
- v Take account of the sustainable transport proposals included within Dover Infrastructure Delivery Plan. New development will be required to contribute towards applicable schemes;
- vi Make provision for cycle parking and storage in accordance with the Parking Standards.

The Council will safeguard the rights of way network, and other cycle and walking routes from development that would compromise their use.

## Water resources, Flood Risk and Coastal Change

### Water Resources

**5.52** Dover is within a high water stress area as identified by the Environment Agency in their publication "Water Stressed Areas Final Classification July 2013". This means that the increase in water demand must be met by increasing water efficiency and reducing leakage, followed by making more efficient use of existing resources. Both the Environment Agency and Southern Water support a reduction in daily usage per person/day for internal use in water stressed areas therefore new developments will be expected to meet the water efficiency optional requirement of 110litre /person/day.

**5.53** Non residential development will be required to meet the BREEAM standard, which is the most commonly accepted assessment tool by which to judge and require increased sustainability standards in new non-domestic developments.

## DM Policy 5 Water Efficiency

New build housing must be built to the higher water efficiency standard under Regulation 36(3) of the Building Regulations, so as to achieve a maximum use of 110 litres per person per day.

The Council would strongly support proposals that seek to reduce daily water consumption even further through the use of external measures such as rainwater harvesting.

For non-residential development, development must achieve BREEAM 'Very Good' standard overall, including Very Good for addressing maximum water efficiencies under the mandatory water credits, unless it can be demonstrated that it is not technically feasible and viable.

## Flood Risk

**5.54** The NPPF and accompanying practice guidance emphasize the responsibility of Local Planning Authorities to ensure that flood risk is understood, managed effectively and sustainably throughout all stages of the planning process. It is also necessary to ensure that new development takes into consideration the impact of future climate change and is designed to mitigate risks.

**5.55** The Strategic Flood Risk Assessment (SFRA) for the District produced in 2019 provides a clear picture of the potential risks associated with flooding within the Dover district and outlines the requirements with regard to ensuring that these risks are managed in a sustainable way into the future.

**5.56** The NPPF requires a site-specific flood risk assessment (SFRA) to be submitted for all development located within Flood Zones 2 and 3. In addition, development situated within Flood Zone 1 will also require an FRA if one or more of the following site criteria are met: greater than 1 hectare; located within an area known to have critical drainage problems; located within an area identified by the SFRA as being at increased flood risk in the future; and, introduces more vulnerable uses in an area shown to be at risk of flooding from other sources.

### DM Policy 6 Flood Risk

**Development sites at risk of flooding must comply with National Planning Policy Framework and associated guidance.**

**Development sites must be accompanied by a site-specific Flood Risk Assessment (FRA) as specified by the requirements set out in the Council's Strategic Flood Risk Assessment.**

**The FRA should be prepared in accordance with the guidance set out in the Council's 'Site-specific Guidance for Managing Flood Risk'. For development identified by the FRA to be at risk of flooding from any source, flood mitigation should be implemented in accordance with the Flood Risk Management hierarchy outlined in the document 'Site-specific Guidance for Managing Flood Risk'.**

## Surface Water Management

**5.57** Flooding from surface water runoff typically occurs following an extreme rainfall event where water from higher in the catchment flows overland and accumulates in topographic depressions. This is further exacerbated in areas with steeply sloping topography, low permeability ground conditions (e.g. urban areas), or where the surface water drainage system (e.g. highway gullies) are overwhelmed.

**5.58** It is necessary to ensure that new development does not increase the risk of flooding offsite as a result of an increase in runoff from the development. Sustainable Urban Drainage Systems (SuDS) can help mitigate runoff and involve techniques that allow rainfall to drain in natural systems. SuDS provide a range of benefits including: reducing flood risk; maintaining and restoring natural water flow rate, improving water resources, minimizing diffuse pollution; reducing pressure on the sewerage network, improving biodiversity and local amenity, and providing green space.

**5.59** The provision of sustainable drainage within new development became a material consideration in planning decisions from April 2015. Kent County Council is the Lead Local Flood Authority (LLFA) for the county and as such they are the statutory consultee in the planning process to oversee the provision of SuDS for major development within the District. The LLFA provides technical advice and guidance on the surface water drainage strategies, designs and maintenance arrangements proposed by developers for any new major development. Kent County Council has prepared a Drainage and Planning Policy Statement (September 2015) containing guidance on how to integrate sustainable drainage systems into the master

planning of large and small developments. Developers should consult and refer to this guidance and any future updates, when preparing applications incorporating SuDs schemes. All applications incorporating a SuDs scheme will also need to include details of a robust maintenance scheme to be agreed with the appropriate authority.

## DM Policy 7 Surface Water Management

**New development must replicate natural ground and surface water flows, and decrease surface water runoff through the use of Sustainable Urban Drainage Systems (SuDs).**

Surface water should be discharged from a development as close to greenfield as practicable, to ensure that surface water run-off is managed as close to its source as possible, following the hierarchy of methods for discharge that have been outlined in the Council's Site-specific Guidance for Managing Flood Risk (2019).

SuDs design, together with a robust long term maintenance plan must be considered as an integral part of the master planning and design process for new development. For major development, drainage must be provided sustainably and integrated into on-site multifunctional open space and landscape provision. Developers should seek and refer to guidance produced by the Lead Local Flood Authority (LLFA) when submitting a planning application for any major development. Approval for the design and long term maintenance of SuDs will be required prior to development being permitted.

The discharge of surface water runoff from a public sewer will only be acceptable, if an assessment of the capacity of the sewer has been undertaken, and the evidence demonstrates that there is no increased flood risk.

## Coastal Change

**5.60** The NPPF (2019) states that Local Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area (CCMA) any area likely to be affected by physical changes to the coast, and: a) be clear as to what development will be appropriate in such areas and in what circumstances; and b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Area.

**5.61** The Review of Coastal Change Management Areas in Dover District, published in June 2018, defines a detailed set of CCMA maps for the Dover District and these are reflected on the Council's policies map.

**5.62** Coastal change and its impact on the natural and built environment is a material planning consideration and current planning guidance states that LPAs need to define CCMA's and consider the local policy within them. Therefore, new planning policy on development and coastal change requires coastal change to be considered at all stages of the planning process, to avoid inappropriate development. The role of the CCMA mapping is to identify areas in which the vulnerability of development proposals can be tested, to ensure that only appropriate development that requires a coastal location and provides substantial economic and social benefits is permitted in these areas. This will involve determining whether the development will be safe through its planned lifetime, or perhaps setting a time limit for development. There is also potential for the CCMA maps to be used to mitigate the impact and reduce the risk facing coastal communities already experiencing coastal change. By putting in place plans to manage the future development of coastal communities through adaptation, for example, by improving their resilience or by relocation, the impacts can be reduced.

## DM Policy 8 Coastal Change Management Areas

Development within a Coastal Change Management Area may be granted planning permission so long as a coastal change vulnerability assessment and geotechnical appraisal are undertaken by suitably qualified persons to demonstrate that the development will be safe and does not increase the risk to life during its planned lifetime; and will not exacerbate rates of coastal change anywhere on the coastline.

For any development within a CCMA, the management of surface water using infiltration/soakaways are unlikely to be permitted along with ponds, swimming pools and septic tanks.

### Carbon Sequestration

**5.63** Trees are a precious natural asset and, as a natural carbon sink, are a vital part of the fight against climate change. They provide habitats for wildlife and are important for their visual amenity. Woodland and individual trees can help to maintain air quality, provide shade, aid water attenuation, help to preserve soils and increase biodiversity. They can act as stepping stones for wildlife throughout the landscape and provide important wildlife corridors within the urban environment. Trees can also make places more attractive and cohesive, which can aid active travel and contribute to greater health and well being.

**5.64** Tree planting is recognised by the Government as being one of the main ways the UK can achieve carbon neutral status by 2050. To support this initiative at a local scale we have introduced requirements for tree planting and protection, to increase tree canopy cover in the District and help sequester carbon from the atmosphere. The presumption is that the trees will be planted and retained within gardens or as part of any landscaping scheme that forms part of the development, rather than off site. Off-site planting should only be considered where space is a constraint. Equally wherever commercial development occurs, planting of new trees will be encouraged where appropriate within landscaping schemes that form part of the development.

**5.65** In addition to tree planting it is recognised that other measures can also be taken to sequester carbon, for example the provision of green corridors, re-wilding, encouraging biodiversity and planting hedges and these mechanisms are supported by other policies in the plan.



## DM Policy 9 Tree Planting and Protection

### Tree Planting

- i A minimum of two new trees will be required to be planted for each new dwelling (this excludes conversions and changes of use), and a minimum of one new tree will be required to be planted per job that is expected to be created through new commercial development.
- ii Trees should be native Kent species of local provenance.
- iii A presumption that the trees will be planted on-site rather than off-site will apply. Where it can be demonstrated that new trees cannot be provided on-site, a contribution will be required towards the Council's Tree Planting Strategy.
- iv A detailed landscaping scheme and landscape management plan should be submitted for all major development schemes, including, but not limited to, details of the trees and shrubs to be planted, and proposals for how the landscaping scheme will be managed and maintained over the lifetime of the development.

### Tree Protection and Replacement

- v Dover District Council will make Tree Preservation Orders (TPOs) when necessary in order to protect specific trees, groups of trees, or woodlands, in the interests of amenity and biodiversity.
- vi The Council will not grant permission for the loss of or damage to a tree, group of trees or areas of woodland of significant amenity, biodiversity or historic value unless there is deemed to be an immediate hazard to public safety.
- vii Trees protected by Tree Preservation Orders should be retained wherever possible, unless: A. they are dead, dying, diseased or represent a hazard to public safety; or B. The Council deems the felling to be acceptable with regards to the Council's policy on tree management; or C. The benefit of the proposed development outweighs the benefit of their retention.
- viii If felling is deemed acceptable by parts (f) or (e) then the planting of two replacement trees in an appropriate location will be required.



6

New homes

**6.1** This chapter sets out the Council's strategy for the provision of new homes in the District over the Plan period and covers:

- What the key issues are in relation to the provision of new homes in the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Planning for housing growth;
  - Residential windfall development;
  - The strategic housing allocations at Whitfield, North and South Aylesham and Eythorne and Elvington;
  - Non strategic housing allocations in the District;
  - Gypsy and Traveller site intensification;
  - The allocation of the land to the south of Alkham Valley Road/ land to the rear of The Meadows Alkham for Gypsy and Traveller pitches
  - Type and mix of housing;
  - Affordable housing;
  - Rural local needs housing;
  - Gypsy and Traveller windfall development;
  - Self Build and Custom Build housing;
  - Residential extensions and annexes; and
  - Houses in multiple occupation.

## What are the key issues to consider?

**6.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to the delivery of new homes:

## How much housing should be planned for and where should it be located?

**6.3** The NPPF (2019) requires Local Authorities to plan for the minimum number of homes needed, based on the Standard Method calculation set out in national planning guidance. For Dover, this equates to delivering 596 dpa or a minimum of 11,920 new homes over a 20 year period. This figure is potentially subject to change, as new data is published.

**6.4** The NPPF (2019) states that any housing need that cannot be met within neighbouring areas should also be taken account of when establishing the amount of housing to be planned for.

**6.5** The Plan needs to allocate a sufficient amount and variety of land for housing in the District to deliver a continuous supply of housing across the Plan period and ensure that the Council maintains a five year housing land supply. In accordance with the NPPF (2019) the Plan (in conjunction with the Brownfield Register) will also need to identify land to accommodate at least 10% of the housing requirement on small sites no larger than one hectare.

**6.6** To date, the existing housing growth strategy set out in the Core Strategy (2010) has never been fully realised, with rates of housing delivery on average falling below target on a year on year basis. The proportion of housing development in Dover Town has been significantly less than the 70% envisaged in the Core Strategy. This is primarily due to the nature of the sites that were allocated in Dover (i.e. more constrained brownfield sites), low land values and as the progress on the delivery of 5,750 new homes at Whitfield has been much slower than originally expected.

**6.7** The issues highlighted with the existing housing growth strategy have led to higher levels of market led windfall development in the District, rather than Plan led development. This development has tended to be in areas with high market demand, and on less constrained and more economically viable greenfield sites, predominantly in Deal and the rural settlements.

**6.8** Housing delivery in the District continues to be constrained by a number of factors including: flood risk, wildlife sites, AONB, heritage, infrastructure capacity and highways. Given this, the challenge for the Council's future housing growth strategy will be to identify the most sustainable locations for new housing development, taking into account existing constraints, particularly around the District's three main Towns of Dover, Deal and Sandwich. Furthermore, the Council will need to consider the role that the District's villages can play in delivering housing growth, to meet local housing need and deliver a more diverse housing mix to sustain rural communities and support rural services.

**6.9** New housing development will also need to make as much use of previously developed or 'brownfield' land as possible. Whilst the use of brownfield sites will need to form part of the housing growth strategy, due to their constrained nature, issues with viability, deliverability and limited supply, it will also be necessary to identify greenfield sites to deliver the District's housing need.

### What type of new homes are needed?

**6.10** The NPPF (2019) states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, gypsies and travellers, people who rent their homes and people wishing to commission or build their own homes). The Strategic Housing Market Assessment (2017, updated 2019) sets out the overall mix of accommodation required in the District over the Plan period, and the Gypsy and Traveller Accommodation Assessment identifies the number pitches that are required to be delivered in the District over the Plan period. It will therefore be important that any development in the District meets this identified need, to provide flexibility and choice in the housing market, meet the needs of the District's population, and create more sustainable settlements.

**6.11** In addition to the provision of new homes, another key issue is the ageing population, with people living longer and the cost of care rising, this may lead to more demand for home adaptations and annexes which enable families of different generations to live together. Furthermore, families are out-growing their homes but unable to move to larger properties due to the shortage of housing, high house prices and the slow turn-over of housing stock, which leads to more demand for residential extensions.

**6.12** In some areas of the District concerns have been raised regarding the over-concentration of particular forms of housing, such as Houses in Multiple of Occupation, and the impact these have on the amenity and living environment in those areas.

### How could these be addressed through planning policy and what is our preferred approach?

#### How many new homes should be planned for?

**6.13** A key principle of sustainable development is the provision of a sufficient number and range of homes to create strong, vibrant and healthy communities, that meet the needs of present and future generations.

**6.14** As part of the preparation of the Local Plan the Council has identified and appraised a range of growth and spatial options through the Sustainability Appraisal (SA) process:

- Growth options - range of potential scales of housing and economic growth that could be planned for;
- Spatial options - range of potential locational distributions for the growth options.

**6.15** By appraising the reasonable alternative options the SA provides an assessment of how different options perform in environmental, social and economic terms, which help inform which option should be taken forward. It should be noted, however, that the SA does not decide which spatial strategy should be adopted. Other factors, such as the views of stakeholders and the public, and other evidence base studies, also help to inform the decision.

**6.16** The housing growth options considered are:

- Baseline Housing Growth - meeting the objectively assessed need (OAN) established through the standard methodology (currently 596 dwelling a year; 11,920 across the Plan Period)
- Higher housing growth - (of 16,519 dwellings), based upon delivering existing commitments (4408 dwellings) and all the suitable and potentially suitable housing sites identified through the HELAA (12,111 dwellings).

**6.17** The new Local Plan should, as a minimum, provide for the objectively assessed needs for housing within the District (NPPF para 11). It is considered that to deliver less than the OAN would be contrary to the NPPF (2019) and Planning Practice Guidance, and no overriding negative impacts or constraints have been identified in evidence so far that would justify providing for less housing than the baseline housing growth.

**6.18** In terms of considering whether we should plan for more than the baseline housing growth, there are a number of factors to consider.

**6.19** Housing delivery in the District continues to be constrained by a number factors:

- 11.6% of the District is in flood zone 3, with areas of particular flood risk around Dover Town, Deal and Sandwich;
- There are five international wildlife sites within the district, the Kent Downs AONB, five SSSIs, two NNRs, two stretches of Heritage Coastline and two Marine Conservation Zones;
- There are 57 conservation areas, 39 Grade 1 listed buildings, 1,781 Grade II and 110 Grade II\* listed buildings, 50 Scheduled ancient monuments, and, 5 Registered parks and gardens.
- The local and strategic highways network requires upgrading to improve capacity and functionality;
- The capacity of existing infrastructure for example schools and the sewerage network to accommodate further growth is limited in places and will require upgrading; and
- Land values and the viability of development varies greatly across the District, with brownfield sites being particularly challenging to deliver. The delivery of the necessary infrastructure needed to support new housing is also challenging for reason.

**6.20** The Sustainability Appraisal of the draft local Plan states that while a higher level of housing growth in the District would make a positive contribution to SA objective 1 (housing), delivering a lower scale of growth (i.e the baseline) would provide greater scope to preserve the District's natural resources, the capacity of the existing infrastructure network, and protect the significance and sensitivities of its natural and historic environments.

**6.21** Furthermore, the Strategic Housing Market Assessment (2017, Part 1, Chapter 7) considers whether the OAN (529 at the time) should be increased to ensure there is sufficient labour supply available to meet the future job growth expected in the area. Although this is no longer a requirement of the Planning Practice Guidance due to the use of the Governments standard methodology, the analysis provided is still useful, and concludes that there is no need to increase the OAN in order to meet the need for economic growth

in the District. Furthermore, the SHMA states that a cautious approach is needed to the housing target unless significant economic interventions are secured (i.e. regeneration and other economic interventions), which are in excess of that seen in the past.

**6.22** The NPPF also places great emphasis on the delivery of homes where they are needed. However, if a Council can clearly and robustly demonstrate that it is unable to meet its own growth requirements, then it can come to an agreement with neighbouring Council(s) under the Duty to Co-operate to meet some, or all, of its shortfall. The Council has fully engaged neighbouring authorities in the preparation of this Plan. At the time of publishing this draft Local Plan there have been no requests for the District to accommodate growth from neighbouring or other authorities.

**6.23** For these reasons the delivery of baseline housing growth is the Council's preferred option.

## Where should the new homes be located?

**6.24** The growth options identified above could be distributed across the District in many different ways. The identification and selection of spatial options for distributing development needs to be guided by:

- Compliance with national planning policy, as set out in the NPPF.
- The current distribution of development in the District, such as where the main towns are, the main transport links, how urban or rural the plan area is, and the role and function of settlements within the plan area, and the relationship between them and with settlements in neighbouring authorities, particularly where these are of a large scale and influence.
- Development that is already planned, such as where planning consent has been granted but not yet implemented.
- The environmental assets and constraints in the District, in order to ensure that the most important environmental assets are safeguarded, and where possible the environment is improved.
- The objectives of the Council, insofar as they relate to the Local Plan, such as ensuring there are enough of the right type of homes and employment land to meet people's needs, supporting economic development and jobs, addressing the needs of more disadvantaged communities, minimising carbon emissions and dealing with air quality issues that can affect human health.

**6.25** With this in mind, the Council carried out the following exercises:

- Review of existing plans and strategies at a national, regional and local level – including the existing growth strategy set out in the Core Strategy and Land Allocations Local Plan.
- Review of the existing evidence base to identify key issues to be addressed as part of the growth strategy.
- Review of existing environmental constraints – for example landscape designations, flood risk, historic assets etc.
- Initial stakeholder and community engagement workshops to discuss issues and opportunities to be addressed in the new Local Plan, and options to manage them.

**6.26** To date, this has led to the definition of five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations), set out below, which have been subject to Sustainability Appraisal.

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and ELR).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).

- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

**6.27** These identified spatial options may need to be supplemented with other reasonable options at a later stage in the plan-making process, in light of new evidence.

**6.28** Spatial options including the allocation of a new settlement have been raised and discussed during the Council's early Local Plan workshops. Options to allocate a new settlement in the Local Plan have been discounted at this stage for the following reasons:

- The Council has enough suitable and potentially suitable promoted site options to meet needs and aspirations of the Local Plan period, without the need for a new settlement.
- No sites have been promoted through the Council's 'call for sites' exercises and assessed through the HELAA that are large enough to be considered new settlements in their own right.
- In the absence of suitable new settlement site options, the process of identifying reasonable and sustainable locations for a new settlements is time consuming and resource intensive. Proceeding with such an option would require a longer plan programme. In addition, due the likely lead in times for actual delivery of a new settlement, this would not deliver housing in the short term, and would be likely to cause difficulties with short term supply of land.

**6.29** Consideration of the need for a new settlement will be explored in more detail when planning for the next plan period.

**6.30** The conclusion of the SA was that Spatial Options C (settlement hierarchy) and D (adopted Plan Dover focus) generally perform the most strongly against the SA objectives, particularly when delivering the baseline growth scenario.

**6.31** Spatial Option C (settlement hierarchy) focuses growth in line with the District's settlement hierarchy, directing more growth to the settlements with the best range and access to service, facilities and job opportunities. This could have benefits in terms of reducing the need to travel by car, encouraging more active healthy lifestyles and limiting air pollution and carbon emissions.

**6.32** Spatial Option D (adopted Plan Dover focus) focuses the vast majority of growth in and around Dover Town, and only distributes the remaining need to the most accessible service centres in the smaller, more rural settlements. This approach also helps to address the pockets of higher deprivation within Dover, but would be less effective at making positive use of the other larger settlements beyond Dover, such as Aylesham, Deal and Sandwich. Conversely, focusing growth in and around Dover Town helps to maximise the use of the District's brownfield land, protecting the natural environment elsewhere in the District. However, concentrating such a significant scale of growth at a single settlement increases the likelihood of adversely affecting known congestion and air quality issues in the town, for example, along the A2/A20.

**6.33** With regards to the other options, Spatial Option A (suitable sites) focusses growth on identified sites in the HELAA, the majority of which are in and around Dover Town. Relatively few suitable and potentially suitable sites have currently been identified at Deal and Sandwich, protecting natural resources, ecological and historic assets in and around these settlements. The remaining growth under this option is dispersed amongst sites identified in the District's rural villages. Developing all suitable and potentially suitable sites in the rural villages would result in a higher number of residents having to travel regularly to access services, facilities and jobs, which is likely to adversely effect congestion and air quality. It is also likely to result in greater greenfield land take across the Plan area, and a greater potential for adverse effects on the historic environment, given the character of many of the Districts rural settlements.

**6.34** The distribution of development set out through Spatial Option E (more even settlement focus) and Spatial Option B (population based) are similar. These spatial options result in the lowest scales of growth at Dover, in favour of greater growth at Deal and the wider network of small settlements. Both spatial options direct growth to the more flood prone and ecologically sensitive north eastern part of the District. Farther afield, the growth accommodated by the District's smaller rural settlements would generate the same notably significant negative effects identified for Spatial Option A above.

**6.35** Given this, the council's preferred option for the distribution of housing growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing growth in the District will therefore primarily be based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

## Housing Site Options

**6.36** The NPPF (2019) requires Local Authorities to allocate a sufficient amount and variety of land for housing in the District to deliver a continuous supply of housing across the Plan period.

**6.37** The Housing and Economic Land Availability Assessment (HELAA) identifies 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 HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF (2019). It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development, as that is the role of the Local Plan.

**6.38** The draft Local Plan makes a number of strategic and non-strategic site allocations for housing development, based on the findings of the HELAA, the Sustainability Appraisal of the HELAA sites, further evidence (for example Highways modelling) and engagement with ward members and town and parish councillors. Sites have been selected in accordance with the council's preferred option for the distribution of housing growth (as set out above), based on their suitability, availability, and achievability. Further explanation of this process is provided in the Housing Topic Paper.

## Residential Windfall Development

**6.39** Residential windfall development can make a significant contribution to the supply of homes coming forward during the Plan period. Such development tends to be small scale and to come forward on previously developed land or vacant areas within or adjoining existing settlement boundaries. For such proposals, policies are needed to clarify which locations and circumstances would be considered acceptable and the criteria against which such applications will be assessed.

### Where should residential windfall development be supported?

**6.40** The current adopted policy in relation to windfall proposals restricts such development to locations within designated settlement areas (those with defined settlement boundaries as shown on the Local Plan Proposals Map), and the principle of development in settlements without defined boundaries is generally not supported. This policy approach was developed under previous national policy and is now considered overly restrictive having regard to the guidance set down in the NPPF and NPPG.

**6.41** The option of continuing with the current policy approach is therefore not considered appropriate.

**6.42** As part of the evidence base for the Regulation 18 Draft Dover Local Plan 2040 the Rural Settlement Hierarchy Study has been updated. This demonstrates that the settlement pattern of the District continues to be dominated by a large number of small villages and hamlets. Such small settlements have a wide range of educational, public transport, retail and community facilities provision. The NPPF advises that windfall development is directed to those villages which are the most sustainable. It also requires that policies reflect the reality that where there are groups of smaller settlements, such as is the case with the settlement



pattern in this District, development in one village can support services in, and therefore the vitality of, nearby villages. The Settlement Hierarchy makes clear that Dover District has a number of larger villages with a good range of key sustainability indicators and a larger number of smaller villages and hamlets which have less facilities but which can be reasonably considered to be located near to, and supportive of, the sustainability and vitality of larger ones. The Councils preferred option therefore when considering suitable locations for residential windfall development is to support in principle windfall development at existing settlements on sites which can support existing services and facilities, and where the scale of the development proposed is appropriate to the capacity of such services and facilities to accommodate the additional development. It is important such a policy includes clear criteria to ensure there are no unacceptable impacts and that the design of such windfall developments is of a particularly high standard reflective of the character and setting of the settlement

**6.43** In taking this approach there is the option of allowing windfall development within and immediately adjoining settlement boundaries, or merely within such defined limits. Given the wide range of scale of settlements that the preferred option includes, it is considered appropriate that a different approach is taken to protect the character of the smaller villages and hamlets. Windfall development will therefore be considered acceptable in principle within and immediately adjoining existing settlement boundaries in the larger most sustainable settlements. In the case of the smaller, less sustainable villages and hamlets only windfall development within the existing confines would be acceptable in principle in the interest of protecting the character of such settlements, and to limit the amount of development given the limited level of services and facilities those settlements provide.

**6.44** Regarding development elsewhere in the wider countryside, the NPPF sets out clearly the limited exceptional circumstances whereby isolated new dwellings would be acceptable. . The Plan could set out such national criteria within policy. However, as national guidance is that Local Plans do not repeat national policy, the preferred option is to make clear in the supporting text that the limited circumstances where isolated new dwellings can be acceptable are set out at national policy level and that applications coming forward for such development in this District will be assessed using such criteria. Wording will also be including in the policy to confirm this.

## What type and mix of new homes are needed?

**6.45** The following options have been considered in relation to providing for a type and mix of housing:

- policy requiring the type and mix of housing delivered meets the local need identified through the latest evidence;
- use nationally produced age and type of household projections from the Office for National Statistics to determine the appropriate type and mix of homes to be built with the District; or,
- allow the type and mix of homes to be determined by the housing market and have no specific policy requirement.

**6.46** Providing the right type and mix of housing will ensure that the local needs of the Districts demographics will be provided for over the plan period. Specifically, the National Planning Policy Framework requires that the needs of the differing community groups in the community should be assessed and reflected in planning policy. Given this and having considering the evidence, the opportunities and policy context within Dover, the preferred approach is to include a policy on the type and mix of housing that should be built based on the latest evidence of demographic need within the District. This is considered the most appropriate approach to ensuring the housing needs of the various demographics of the District are met. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Provision of Affordable Housing

**6.47** In order to meet the District's needs for affordable housing the plan will include a policy which sets out specific requirements for the amount and types of affordable housing required on sites proposed for housing. The SHMA indicates that of the overall housing requirement, 73.1% should be market housing, 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent. At the time of writing MHCLG are consulting on proposals to introduce 'First Homes' as a proportion of the overall affordable housing secured on development, which is expected to replace the policy in relation to starter homes.

**6.48** The NPPF states (para 34) that plans should set out the contributions expected from development, including affordable housing requirements, and that such policies should not undermine the deliverability of the plan. The draft Local Plan has therefore been informed by a Local Plan Whole Viability Study which assesses the impact of proposed policy choices on the deliverability of the plan, and considers various options for the levels and types of affordable housing, balanced against other policy requirements.

**6.49** The Local Plan Whole Viability Study has concluded that within the Dover Urban Area, through a number of scenarios, it is not viable to provide affordable housing, including the minimum requirement in the NPPF for 10% affordable home ownership. It is therefore the Council's preferred option that for Dover Urban Area there will be no affordable housing to be provided. This will also assist with the delivery of brownfield sites in the town, contributing to the regeneration of the area.

**6.50** In terms of the rest of the district, there are three different values areas which impact upon the ability of development to delivery affordable housing. Within the higher and medium values areas the viability evidence demonstrates that development can support a requirement for 30% affordable housing. Within the lower value areas the delivery of 30% is more marginal and would depend upon the level of developer contribution being sought for infrastructure. Further work is needed to determine the level of developer contributions likely to be required and more detailed work is required in relation to the viability and deliverability of the proposed strategic allocations set out below. This work will take place following the regulation 18 consultation, prior to the Regulation 19 consultation, and has the potential to impact upon the level of affordable housing to be required in the lower value area. At this stage, given the need identified in the SHMA, it is considered that to divert away from this would not work towards meeting the demonstrated housing need.

**6.51** The preferred option is therefore to have a 30% requirement for the rest of the district outside of the Dover Urban Area. This would be the starting point and any schemes not able to meet these requirements would need to demonstrate through an independently assessed viability study to support any non-compliance with the 30%. It is also considered suitable and proactive for a criteria based policy to outline where flexibility could be made if viability is demonstrated to be an issue for delivery of the 30% affordable housing requirement.

**6.52** The NPPF allows affordable housing to be secured on sites of 10 dwellings or more (or sites larger than 0.5ha). In addition, in AONBs and designated rural areas, the threshold can be reduced to 6 dwellings. The viability work demonstrates that sites of these thresholds within those areas are able to accommodate affordable housing, and given the overall need for affordable housing in the District, it is considered that these thresholds are the most appropriate in order to maximise delivery of affordable housing.

**6.53** The NPPF (para 77) requires local plans to include policies in relation to local needs housing. The existing development plan includes such a policy, which it is considered appropriate to roll forward, with the addition of criteria in relation to design, which is considered necessary to ensure development meets the design standards set out in the design policies, and to meet the requirements of the NPPF and national guidance in that respect.

## Gypsy and Traveller Accommodation

**6.54** Gypsy and Traveller accommodation is a specialised type of dwelling type known as pitches that fall within the overall District need for new homes. Whilst being part of the overall need for housing, this type of accommodation also has its own specific national Planning Policy for Traveller Sites (PPTS). The PPTS sets out both how Local Authorities should identify and provide for the need, and provides definitions on whether persons are “gypsies and travellers” and what constitutes a pitch.

### How many Gypsy and Traveller pitches should be planned for?

**6.55** The level of need for the District is set out within the latest Gypsy and Traveller Accommodation Assessment (GTAA) and includes both need as defined within PPTS and need based on a broader 'cultural' definition of Gypsies and Travellers and Travelling Showpeople which identifies households as a Gypsy and Traveller /Travelling Showperson but do not meet the travelling clarification questions of the PPTS. The GTAA includes this second cultural need as it accords with the Housing and Planning Act 2016 section 124 which considers the needs of households living in caravans.

**6.56** The latest update to the GTAA states that for the plan period 2020 to 2040 there is a cultural need for 26 pitches and a PPTS need for 16 pitches. Policy options for addressing these needs include:

Plan to meet only the PPTS need as established in the GTAA, or, Rely on windfall planning consents to address the pitch needs as established in the GTAA.

- The Council could plan to meet both Cultural and PPTS pitch needs as established in the GTAA; or,
- Plan for a higher Cultural and PPTS pitch growth than the established in the GTAA; or,
- Plan to deliver less Cultural and PPTS pitch growth than established in the GTAA; or,

**6.57** The preferred option is to meet the cultural and pitch need as established in the GTAA. This option is considered the most appropriate when considering national planning policy and legislative requirement. Failure to identify and plan for a policy and legislative compliant Gypsy and Traveller Accommodation need, may increase the risk of unauthorized encampments and appeal challenges to planning applications for pitches in non-policy compliant locations within the District.

### Where should the new pitches be located?

**6.58** The Gypsy and Traveller site options investigation study (2020) identified that there were opportunities and locations for addressing the cultural and PPTS accommodation need for the district. The study stated that at January 2020 there were 10 vacant pitches on existing authorised sites; 22 potential pitches could be delivered through the intensification/expansion of existing sites (15 on authorised sites, 5 on tolerated sites, 2 on sites that are unauthorised); and, 28 pitches which could be delivered on new sites. Plan policy options include:

- In planning for pitches in the district count and monitor vacant pitches, identify permitted and tolerated sites for prescribed levels of intensification, and to allocate sites to a level to meet any residual need after other sources of supply have been counted, or,
- Require strategic and large allocations in areas where there are concentrations of Gypsy and Traveller sites, to take a proportion of the pitches need for the district; or,
- Rely on windfall planning consents to address the need.

**6.59** The Council's preferred option is to allocate sufficient sites to meet the need over the plan period, and not to rely on any windfall provision. In order to do this, it is proposed to identify pitches on existing sites which are considered appropriate for expansion/intensification, and identify additional specific sites for allocation to meet the remainder of the identified need.

**6.60** A major constraint to the identification of new sites for allocation is that limited options have been put forward to the Council for this use. The Gypsy and Traveller site options study (2020) identified three potential sites for allocation. Two of the sites are considered in principle to be suitable for Gypsy and Traveller accommodation, and are therefore proposed as draft allocations at the current time, as set out in Strategic Policy 6 and SA Policy 2 below. These sites would be required to provide 10 pitches each in order to meet the overall need. It is recognised that sites of such size are not always suitable or desirable, and may not meet the needs of some of the Gypsy and Traveller community. It is therefore the Council's preference that a larger number of smaller sites be identified and allocated within the Plan in order to meet this need. A call for sites specifically for Gypsy and Traveller Accommodation is therefore being carried out in order to identify further sites for allocation, and to minimise the likelihood for windfall sites to be needed.

**6.61** Notwithstanding this, it is likely that planning applications for windfall proposals will still be submitted to the Council. The options for addressing this is either to include a policy which set out specific local criteria by which applications should be considered, or instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District. The preferred option is to include a specific policy which will allow local factors to be taken into account and enable the Council to only support those proposals which are in appropriate locations and would not have unacceptable impacts upon the local area.

## Self Build and Custom House Building

**6.62** Another type of specialised housing that falls within the overall housing need for the District is self build and custom house building . This type of housing is supported by legislation and requires the Council to identify the level of need through the use of a register and places a duty on the Council to grant enough planning consents to meet the identified need.

### How many self build and custom house building plots should be planned for?

**6.63** At present, the Council has an identified need for 4 plots on part 1 of its register and 3 plots on part 2. Legislation only requires the Council to consider the need as identified on part 1 of the register. Plan policy options include:

- allocating specific sites to meet the established need as reported on part 1 of the register;
- go beyond meeting the statutory need and allocate specific sites to meet the identified need for part 1 and 2 of the register;
- rely on windfall planning consents to address the plot need as established by part 1 and/or part 2 of the register

**6.64** Due to the number of plots required on the register the Council's preferred option is to include a specific windfall policy for self build and custom house building to assist in the delivery of self and custom build housing. The Council's register is a process formulated through legislation and provides an accurate indication of local need and capability to carry out development. By not placing an undue requirement on site allocations to provide for a level of self build and custom house building need that is not established, those sites will be less constrained in delivering other types of identified housing need. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Where should the new plots be located?

**6.65** The Self Build and Custom House building register poses a series of questions to applicants to help identify their preferred location for development and size of dwelling to be built. The information obtained from the register can help identify the locations and size of plots required when planning for this need. The options for considering where plots can be located include:

- Allow the housing market to determine plot provision through windfall consented planning applications; or
- Plan for plots as prescribed by the Self Build and Custom House building register; or,
- Allocate site(s) where land has been made available to meet the plot need.

**6.66** The Councils preferred approach is to allow the location and size of plots to be determined through the housing market and windfall planning applications. This approach is appropriate and is considered the most appropriate due to the low level of need currently identified on the register, the limited amount of land required and that no sites for this need have been identified through the Councils Housing and Economic Land Availability Assessment and deemed suitable allocation in the Plan.

## Residential Extensions and Annexes

- With regards to residential extensions and annexes in the District, the council can either adopt a local approach to managing this issue and include a policy in the Plan to facilitate the delivery of residential extensions and annexes; or
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

**6.67** Residential extensions and annexes can allow for homes to be adaptive to changing lifestyle and societal needs. It is identified that Dover has an ageing population, a trend that is expected to continue into the Plan period, these types of development offer the opportunity to support the living needs of mobile older persons whilst reducing the premature need to enter into care facilities. Further, given the changes in working place practices towards greater home working then there will be an increased need for this type of development. Given this and having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a policy to assist in the delivery of residential extensions and annexes. This is considered to represent the most appropriate method for setting out a set of clear principles that each development will need to consider, and will assist in the effective management of development in the District. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Houses in Multiple Occupation

**6.68** With regards to houses in multiple occupation, the council can:

- Include a specific criteria based policy in the Plan to manage HMOs and their impacts on communities;
- Instead rely on the National Planning Policy Framework, and Planning Practice Guidance when providing planning advice and determining planning applications for development in the District.

**6.69** At present, having considered the evidence, opportunities and policy context within Dover, the preferred approach is to include a criteria based policy to manage HMOs and their impacts. This is considered to represent the most appropriate method for setting out a set of clear principles that each application will need to consider, and will assist in the effective management of development in the District. In some cases the creation of HMO's does not require planning permission, if it is a change for an existing C3 dwelling housing to a small HMO (C4 - where between three and six unrelated people share communal facilities). It

is possible for the Council to serve an Article 4 direction to require such changes of use to require planning permission. The Council will need to consider whether there is sufficient evidence that the impact of such changes of use warrant controlling through these means.

## Draft strategic policies and supporting text

**6.70** Based upon our preferred policy approach, the following sets out the draft supporting text and policies in relation to housing.

## Delivering Housing Growth

**6.71** A minimum of 11,920 new homes are required in the District over the Plan period to 2040. The Council's housing supply comprises:

- The extant supply of planning consents (both major and minor) for new dwellings as identified in the housing information audit (HIA) at the end of March each year and reported in the AMR. A non-implementation reduction of 10% has been applied to the total number of extant units across these commitments.
- The existing planned urban extension at Whitfield. To date 1,483 homes have been granted consent at Whitfield of which there have been 200 completions, leaving 1,283 homes extant as at 31 March 2020. It is currently estimated that in addition to the delivery of the extant permissions, a minimum of a further 2,200 homes can be delivered at Whitfield over the Plan period, with the remainder of the development being delivered outside the Plan period (further justification for this is provided in the Housing Topic Paper).
- Residential windfall sites i.e. proposals that come forward on sites that have not been allocated for housing over the plan period. The windfall contribution from small sites of less than five new dwellings to the overall supply of housing is 70 dwellings per annum - based on the annual average of past trends from this source since adoption of the Core Strategy in 2010. The contribution from small windfall sites is considered appropriate from year 4 of the Plan period (2023/2024) to avoid any double counting from windfall sites that have already received planning permission, and are counted within the extant permissions. Therefore, it is considered justified and deliverable to include a windfall allowance of 1,190 dwellings in the anticipated housing supply for the Plan period (further justification for this is provided in the Housing Topic Paper).
- Sites that have been allocated for residential development in the Local Plan, based on the findings in the Housing and Economic Land Availability Assessment.
- In order to meet the level of identified housing need it is important to maintain a healthy supply of housing, to provide flexibility and choice, and to account for changing circumstances and under-delivery, a buffer of 10% is therefore provided within the identified supply (further justification for this is provided in the Housing Topic Paper).

**6.72** The table below summarises the Council's current housing supply position and shows that in order to meet the Local Housing Need for the District the Council will need to allocate housing sites in the Local Plan to deliver 5,288 homes over the Plan period.

	Dwellings (net)	Dwellings (net)
Local Plan housing need figure (20XLHN 2020 - 596)		11,920
Supply resilience buffer (10% Local Plan housing need figure)		1,192
Local Plan housing target		13,112
Extant supply at 31st March 2020 (Excluding Whitfield and with 10% non-implementation discount applied)	3,151 (3,501 - 10%)	
Whitfield (extant)	1,283	
Whitfield Urban Extension	2200	
Windfall	1,190 (70 a year from year 4)	
Total housing supply	7,798	
Balance to be delivered on allocated housing sites		5,288

Table 6.1

### Five Year Housing Land Supply

**6.73** National policy requires local planning authorities to demonstrate a five year supply of deliverable housing sites, which must be updated annually. At 1st April 2020, the Council has 6.16 years of housing supply, with a 5% buffer. Accordingly, it is considered that the Council can demonstrate a five year housing supply for the purpose of paragraph 11 of the revised NPPF. At present this supply does not contain any of the proposed site allocations set out in the draft Plan. Whilst the Council can demonstrate a five year housing land supply without the need for additional housing sites, the provision of additional sites within the first five years of the housing trajectory will ensure resilience and promote flexibility and choice, and assist in ensuring the Council can demonstrate a five year housing land supply in future years.

### Gypsy and Traveller Accommodation

**6.74** The NPPF requires Local Plans to include provision for the needs of Gypsy and Travellers. This is informed by a Gypsy and Traveller Accommodation Assessment which has been carried out for Dover by consultants Arc4. In January 2020, the Gypsy and Traveller accommodation need was updated to the plan period 2020 to 2040. By applying the annualised needs figures this results in a cultural need for 26 pitches and a PPTS need for 16 pitches, a total of 42 pitches in the District over the plan period. This need is planned to be met in the following way:

- 10 pitches are likely to become available through turnover on existing sites and this will be monitored as part of the Council's yearly Housing Information Audit.
- 9 pitches can be provided through suitable intensification of existing sites (see DM Policy 10).
- Land is allocated to the south of Alkham Valley Road / Land to the rear of The Meadows for up to 10 pitches (SA Policy 2).

- Land is allocated as part of the strategic allocation to the south of Aylesham for 10 pitches (Strategic Policy 6).
- A call for sites will be carried out as part of the Regulation 18 consultation on the draft Local Plan seeking to identify additional land that could deliver the 3 pitches required to meet the level of identified need and to provide a wider range of options for potential site allocations.

## Housing Distribution

**6.75** The Council's settlement strategy continues to focus on the development and regeneration of Dover Town, with around half of new housing development planned there, the majority of which is to be delivered as part of the new urban extension at Whitfield (see Strategic Policy 4).

**6.76** If the distribution of housing growth in the district were to purely follow the settlement hierarchy (as set out in Appendix 1) the secondary focus for development should be the District Centre of Deal, followed by the Rural Service Centres of Sandwich and Aylesham. However, given the combined constraints of landscape, access, flood risk, wildlife and site availability, the growth potential of Deal and Sandwich is considered to be limited and therefore the main focus of development here will be through the strategic expansion of Aylesham (see Strategic Policies 5 and 6).

**6.77** The remainder of the housing growth will then be distributed across the Districts local centres and large and small villages in the rural area, taking into account existing constraints and site availability. Here, a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with the NPPF (2019) and Planning Practice Guidance. New housing can enable rural communities to retain and strengthen existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

**6.78** As part of the Council's strategy for the rural area it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District, and this is shown on the revised settlement hierarchy in Appendix 1. This reflects the level of services and facilities likely to be delivered alongside new homes here. Further details of the Council's strategy for Eythorne and Elvington is set out in Strategic Policy 7.

**6.79** The identification and allocation of housing land has been informed by the Housing and Economic Land Availability Assessment which 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.

**6.80** A number of allocated sites are of strategic importance for delivering the quantity and type and variety of homes required to deliver the strategy. These are identified as Strategic sites.



6.81 The distribution of housing growth in the District, by settlement type, is set out in the Table below.

Settlement Type	Proposed Housing Number	% Distribution by Settlement
Dover (Secondary Regional Centre)	3,592	47.82%
Deal (District Centre)	554	7.38%
Sandwich; Aylesham (Rural Service Centres)	1,490	19.83%
Eastry; Wingham; Ash; Shepherdswell; St Margarets at Cliffe; Eythorne/Elvington (Local Centres)	1,152	15.34%
Larger Villages	660	8.79%
Smaller Villages and Hamlets	63	0.84%
<b>Total</b>	<b>7511</b>	<b>100%</b>

Table 6.2

6.82 Strategic Policy 2 sets out the scale and distribution of housing growth in Dover to 2040. The strategy aims to direct growth to the most sustainable locations in the District, taking into account existing environmental, historical and highways constraints, and seeks to support and maintain the vibrancy and sustainability of settlements.

## Strategic Policy 2: Housing Growth

Provision is made for at least 11,920 net additional homes, in the District between 2020 and 2040. In order to achieve this target, additional housing sites are proposed to provide choice and competition in the market up to 2040.

The housing target will be met through a combination of committed schemes, site allocations and suitable windfall proposals.

Provision is made for 42 Gypsy and Traveller pitches in the District over the Plan period. This need will be met through turnover on existing sites, intensification of existing sites and site allocations.

The Council will resist any net loss in the Districts stock of dwellings, or authorised permanent Gypsy and Traveller sites; unless otherwise in accordance with other plan policies. Areas and sites that are key to the delivery of the housing growth strategy have been designated or allocated on the Policies Map.

The majority of new housing development will be in and around Dover Town where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create a new neighbourhood with supporting infrastructure. With this in mind, in addition to existing commitments, land allocations to deliver 3,592 homes are proposed.

Development will then be focused in the District Centre of Deal, and the Rural Service Centres of Sandwich and Aylesham, subject to the satisfactory mitigation of environmental and highways constraints identified here. Development in Deal, Sandwich and Aylesham will be at a more limited scale than Dover Town, compatible with the more limited range of job opportunities, shops, services and other facilities available in these locations. With this in mind, in addition to existing commitments, land allocations to deliver 2,044 dwellings are proposed.

Development in the rural areas will be of a scale that is consistent with the relevant settlement's accessibility, infrastructure provision, level of services available, suitability of sites and environmental sensitivity. With this in mind, in addition to existing commitments, land allocations to deliver 1,875 dwellings are proposed.

Development that would result in disproportionate growth to any of the Districts settlements, which cannot be supported by the necessary infrastructure and services or would result in a loss of services and facilities which are considered to be key to supporting local communities will be resisted.

Windfall housing development will be permitted where it is consistent with the spatial strategy outlined above and is consistent with other policies of this Local Plan.

### Residential Windfall Development

**6.83** Windfall sites are sites that have not been identified for residential development through the land allocation process but that may be otherwise suitable for development. They tend to be small in scale and can offer a significant contribution to the supply of homes using previously developed land and vacant areas within settlement boundaries. Over the last 10 years windfall development has made an important and sustained contribution to the provision of additional homes in the District, accounting for 45% of all completed dwellings within the District over this period. Over two thirds of these windfall developments have been

new-build dwellings with 85% of these coming forward on previously developed land. Over this period, the spatial distribution of windfall development has largely followed the settlement hierarchy, with 39% at Dover, 31% at Deal and 12% within the defined confines of rural villages.

**6.84** In accordance with the NPPF and associated guidance it is important that policies allow for suitable development opportunities for windfall housing to come forward during the Plan period in sustainable locations, within or immediately adjoining the built confines of settlements which have a reasonable range of facilities. In doing so it is important that the scale and quantity of such windfall developments should always be in proportion to the size of the settlement and the range of services and community facilities it offers at the time. Such an approach acknowledges that new housing can help rural communities retain existing services, such as public transport routes, retail and educational facilities. In Districts such as Dover where the countryside is characterised by groups of smaller settlements, development in one village may also support the viability of services in another village close by.

**6.85** However, in adopting such a policy approach a balance must be achieved between allowing residential windfall development in rural settlements and the need to protect the scale, character, built form, economy, heritage and natural environment of the settlements themselves, as well as their settings and surrounding countryside. In order to ensure that windfall developments are successfully integrated, all development proposals will therefore have to demonstrate that they complement the layout, scale, fabric and appearance of the existing settlement and that they will not result in the loss of important green spaces within the built up confines that contribute to the existing character of that settlement, to be considered acceptable.

### Settlement Boundaries

**6.86** As part of the evidence base for this Plan the Council has undertaken a review of its Settlement Hierarchy. Alongside the main town of Dover and the two other principle settlements of Deal and Sandwich, the District continues to possess a wide range of rural settlements which define much of its attractive character. Aylesham in the north west of the District has been identified as a Rural Service Centre and continues to play an important role in that regard. The majority of the remaining rural settlements are villages and hamlets, many with Conservation Areas at their core. These villages and hamlets are considered suitable in principle for windfall development of appropriate scale, taking account of the cumulative impact of any allocated sites and other developments with planning permission within the settlement. In the larger of these villages, windfall development will be acceptable in principle within or immediately adjoining the settlement boundaries. In the smaller of these villages and hamlets windfall development within the confines only will be acceptable.

**6.87** A review of the existing settlement boundaries will be undertaken prior to the publication of the Regulation 19 Draft and when responses to the consultation on this Regulation 18 Plan have been assessed. Such a review will also take into account of any village boundaries produced as part of Neighbourhood Plan work.

### Residential windfall development elsewhere in the countryside

**6.88** National policy is clear that isolated new dwellings in the countryside outside of settlement boundaries are only permissible in exceptional circumstances. These circumstances are limited to dwellings where there is an essential need for a rural worker to live permanently at or near their place of work, or where the new dwelling would represent the optimal viable use of a heritage asset, or would be appropriate enabling development to secure the future of heritage assets, or would re-use redundant or disused rural buildings and enhance their immediate setting, or would involve the subdivision of an existing residential dwelling or, finally, where the new dwelling is of exceptional design quality.

**6.89** Applications coming forward for isolated new dwellings in the countryside outside the boundaries of the District's rural settlements will be assessed against these national criteria. For applications to convert redundant rural buildings to dwellings, proposals will need to demonstrate that the existing buildings have been on site for a period of years, have been appropriately maintained and are no longer needed for their current or previous use. Proposals submitted under the final category of exceptional design quality should be demonstrably outstanding or innovative, reflect the highest standards of architecture and significantly enhance and be sensitive to the defining characteristics of its immediate setting. Such proposals will be subject to rigorous and independent assessment of their design quality by the Dover Design Panel and applications will be expected to respond to the advice provided.

### Strategic Policy 3: Residential Windfall Development

Residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries, as shown on the Proposals Map, of the following settlements:

Ash, Alkham, Aylesham, Capel-le-Ferne, Deal, Dover, East Langdon, Eastry, Elvington, Eythorne, Goodnestone, Kingsdown, Lydden, Northbourne, Preston, Ripple, Sandwich, Shepherdswell, St Margarets at Cliffe, Wingham, and Worth.

Minor residential development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within the settlement boundaries, as shown on the Proposals Map, of the following settlements:

Ashley, Barnsole, Betteshanger, Chillenden, Coldred, Denton, East Studdal, Elmstone, Finglesham, Martin, Martin Mill, Nonington, Ringwoud, Staple, Stourmouth, Sutton, Tilmanstone, West Hougham, West Langdon, Wingham Green, Woodnesborough and Wootton.

Subject to all of the following criteria being met:

- i It is of a scale that is appropriate to the size of the settlement and the range of services and community facilities that it offers at the time taking account of the cumulative impact of any allocated sites and other developments with planning permission within the settlement;
- ii It is compatible with the layout, density, fabric and appearance of the existing settlement;
- iii It would not result in harm to or the loss of important green spaces within the confines that contribute positively to the existing character of that settlement;
- iv It would not result in significant harm to heritage assets, landscape character or biodiversity;
- v It includes an appropriately sized and designed landscape buffer to the open countryside;
- vi It would not have a significant adverse impact on the living conditions of existing adjoining residents;
- vii It would not result in the loss of active employment, leisure or community facilities within the settlement;
- viii Vehicular, bicycle and pedestrian access can be safely provided into the site without requiring extensive additional infrastructure; and
- ix It is demonstrated that traffic generated from the development can be safely accommodated on the local road network.

New dwellings elsewhere in the countryside outside of settlement boundaries will only be permitted in exceptional circumstances under one or more of the criteria set out in national planning policy and guidance.

## Strategic Housing Allocations

**6.90** To deliver the Councils identified housing need four strategic housing site allocations are proposed, in accordance with the housing growth strategy set out above.

**6.91** When planning for the supply of new homes Local Authorities are required by the NPPF to consider the use of Garden City Principles to guide the development of new settlements or significant extensions to existing villages and towns (para 72 of the NPPF 2019).

**6.92** A Garden City is a holistically planned new settlement that enhances the natural environment and offers high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities. Garden City principles are an indivisible and interlocking framework for delivery and provide an opportunity to create innovative, resilient and inclusive places that will stand the test of time. The Garden City movement was founded by Ebenezer Howard and the first Garden City was developed at the start of the 20th Century in Letchworth.

**6.93** More recently there has been a renewed interest in smaller 'garden community' developments, in the form of garden villages, and this has become part of the governments wider programme for housing delivery.

**6.94** Like the idea of the Garden City, the garden village concept is not new, and have formed an important part of Britain's urban development history since the Industrial Revolution.

**6.95** The Town and Country Planning Association define a garden village as a new community that is designed, delivered and managed in accordance with the Garden City principles, but tailored for a smaller scale than new Garden Cities (which are likely to be more than 10,000 homes in size). It may be developed within existing settlements (as an urban village or suburb) or as a sustainable urban extension<sup>1</sup>.

1 (TCPA, Understanding Garden Villages, 2018)

6.96 The Council will expect the development of the strategic allocations to follow the Garden Village principles set out in the Box below.

## Garden Village Principles

Key principles for designing garden villages include<sup>2</sup>:

- **Holistically planned:** New garden villages should be holistically planned, with a strategic framework (masterplan) which is comprehensive enough to guide investment but flexible enough to evolve over time.
- **Small in Scale**
- **Planned for healthy living:** Planning for healthy communities is integral to the creation of new places today. New garden villages should foster healthy and active communities by encouraging walking and cycling and by providing a comfortable, stimulating and therapeutic environment, bringing together the best of the urban and natural environments, for people of all ages.
- **Make provision for a vibrant social life:** New garden villages should be characterised by their social and cultural vibrancy.
- **Designed with high-quality materials and attention to detail:** The creation of a new garden village provides an opportunity to set a framework for design and development that is both sensitive to local character and creates distinctive neighbourhoods. Garden villages must be exemplary in high-quality and innovative design, featuring the application of the highest sustainability standards, innovative use of local and sustainable new materials, and high-quality imaginative architecture, making use of expert craftsmanship.
- **Designed to provide affordable homes close to employment:** New garden villages should meet the full range of housing needs and aspirations through a diversity of housing opportunities, having particular regard to the needs of older people and the provision of plots for self-/custom-building.
- **Provision of services for day-to-day needs within walking distance of homes:** New garden villages should provide a sustainable urban structure of walkable neighbourhoods based around a network of mixed-use town and local centres in which residents can meet most of their day-to-day needs.
- **Land ownership and long-term stewardship:** Delivering a successful new community requires a clear understanding of how assets generated by the development process will be managed in perpetuity. New garden villages must demonstrate how such management will be undertaken on behalf of the community.

## Whitfield Urban Expansion

6.97 The urban expansion of Whitfield is currently identified as a strategic allocation in the Core Strategy 2010 for the delivery of at least 5,750 new homes. The Whitfield Supplementary Planning Document (2011) provides the planning framework to guide the delivery of the site.

6.98 Through the Housing and Economic Land Availability Assessment work the Council has also identified an area of land to the north-west of the existing allocation (HELAA Ref: WHI001) for the delivery of approximately 600 new homes. Strategic Policy 4 allocates this site in addition to the existing allocation at Whitfield for development in accordance with the growth and settlement strategy of the Plan.

2 (TCPA, Understanding Garden Villages, 2018)

**6.99** To date 1,483 homes have been granted consent at Whitfield of which there have been 200 completions, leaving 1,283 homes extant as at 31 March 2020. It is currently estimated that a minimum of a further 2,200 homes can be delivered at Whitfield over the Plan period, with the remainder of the development being delivered outside the Plan period (further justification for this is provided in the Housing Topic Paper).

## Strategic Policy 4 Whitfield Urban Expansion

Land to the west, north and east of Whitfield is allocated for the creation of a new neighbourhood comprising at least 5,750 homes supported by transport, education, primary health and social care, utility services and green infrastructure together with retail, leisure and employment uses.

Land is also allocated to the north-west of the existing allocation at Whitfield to deliver approximately 600 new homes.

A revised Supplementary Planning Document (SPD) will be required, incorporating the proposed extension to the site, to guide the future delivery of the Whitfield urban expansion. This should set out the quantum and distribution of land uses, access, sustainable design and layout principles, in addition to providing an updated phasing and delivery strategy for the whole site. This should be prepared by the land owner, working jointly with the Council, and key stakeholders. Any application for development should be preceded by, and consistent with, the SPD.

In order to ensure that the site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan set out in the revised SPD, and will not prejudice the implementation of the site as a whole.

The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.

Mitigation will also be required to address the air quality issues identified in the Air Quality Study (2020).

## Aylesham Growth Area

**6.100** Aylesham was developed as a planned settlement to serve the emerging East Kent Coalfield. According to Sir Patrick Abercrombie's plan of 1928, Aylesham was to be a small town of about 15,000 residents with a range of commercial and civic buildings. However, mainly due to the recession in the 1930s, his grand scheme was abandoned after only 500 dwellings were built. Since then the village has expanded, though largely not in keeping with the original layout. According to the 2011 Census, Aylesham Ward (which is dominated by Aylesham) now has 1,981 dwellings and a population of 4,905.

**6.101** The 1990 Dover Structure Plan identified Aylesham as strategically suitable for the release of land to deliver around 1000 dwellings. This provision was made to help meet Canterbury District's housing needs which could not be met at the City itself, due to environmental and infrastructure constraints, and to attract new investment to the former East Kent Coalfield to regenerate this area. Further to this, Aylesham was identified as a strategic development opportunity site in the Dover District Local Plan 2002, for the provision of 1,000 new homes, a primary school extension, employment uses, retail and an associated mix of uses. A masterplan was then prepared to guide the development of this site and this was adopted by the Council

on the 21st July 2004. The site was granted outline permission for 1,210 units (App no 07/01081) in November 2012 with an additional 150 units (App no 19/00821) granted in August 2020 bringing a total of 1360 units permitted for the site. To date 785 units have been delivered with 575 remaining.

**6.102** Aylesham is identified as a Rural Service Centre in the settlement hierarchy (see Appendix 1) and is well supported by a range of services and facilities including two primary schools, village hall, two churches, fire station, sports club, social club, leisure centre and a library. Aylesham has two industrial areas and a small neighbourhood centre of nine shops including a post office, a co-op and a butchers, four take-aways and four cashpoints. There is also a bus service to Dover and Canterbury with buses every hour on weekdays, and railway station which also provides access to Dover and Canterbury.

**6.103** Through the Housing and Economic Land Availability Assessment work the Council has identified two sites for development in Aylesham, one to the North of Aylesham (HELAA Ref: AYL004) for the delivery of approximately 500 new homes and the second to the south of Aylesham (HELAA Ref: AYL003) for the delivery of approximately 640 new homes. Strategic Policies 5 and 6 allocate these sites for development in accordance with the growth and settlement strategy of the Plan. Whilst it is recognised that constraints do exist on these sites, primarily in relation to the cumulative impact upon the local road network, work is on-going to address this and develop an appropriate mitigation scheme.

**6.104** To support the delivery of the Local Plan the council is working with key stakeholders to produce an Infrastructure Delivery Plan. This is an iterative document that sets out the infrastructure required to support the planned development set out within this Plan. As part of the Regulation 18 consultation on the draft Local Plan the council will be engaging with infrastructure providers, on site specific infrastructure requirements. These comments will be used to inform the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be published as part of the Regulation 19 consultation on the Local Plan.



## Strategic Policy 5 North Aylesham

An extension is planned to the North of the Rural Service Centre of Aylesham to create a new neighbourhood, incorporating garden village principles.

Land to the North of Aylesham is allocated to deliver approximately 500 new homes over the Plan period.

A masterplan is required to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared by the land owner, working jointly with the Council and key stakeholders. Any application for development should be preceded by, and consistent with, the agreed Masterplan.

In accordance with the relevant Local Plan policies the sites will provide:

- i A wide mix of housing types, sizes and tenures, including affordable housing; housing for older people; serviced plots of land to contribute towards meeting evidenced demand for self-build and custom housebuilding;
- ii Suitable access arrangements and any necessary wider strategic and local highway mitigation measures, including addressing impacts on the A2, B2046, A257 and local roads;
- iii Sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives;
- iv Community facilities, and a new small convenience shop in an accessible location to meet the day-to-day convenience shopping needs of new residents;
- v Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards. Spaces will contribute to wider ecological networks and as such, spaces should:
  - be accessible to new and existing communities;
  - provide upgraded routes for walkers and cyclists;
  - improve connections between and enhancements to existing habitats;
  - provide safe routes for wildlife, protecting and enhancing wildlife assets.
- vi Protection and enhancement of heritage assets and their settings through appropriate mitigation measures;
- vii Landscaping and planting, including a generous landscape buffer to the west to minimise visual impact on the surrounding landscape;
- viii Sustainable drainage;
- ix Necessary utilities, including integrated communications infrastructure to facilitate home-working.
- x Financial contributions towards the delivery of required off-site infrastructure and community facilities in accordance with Strategic Policy 13.

In order to ensure that each site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan, and will not prejudice the implementation of the site as a whole.

The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.

## Strategic Policy 6 South Aylesham

An extension is planned to the South of the Rural Service Centre of Aylesham to create a new neighbourhood, incorporating garden village principles.

Land to the South of Aylesham is allocated to deliver approximately 640 new homes over the Plan period.

A masterplan is required to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared by the land owner, working jointly with the Council and key stakeholders. Any application for development should be preceded by, and consistent with, the agreed Masterplan.

In accordance with the relevant Local Plan policies the site will provide:

- i A wide mix of housing types, sizes and tenures, including affordable housing; housing for older people; and serviced plots of land to contribute towards meeting evidenced demand for self-build and custom housebuilding;
- ii Provision for 10 permanent Gypsy and Traveller pitches to meet the council's identified need. This should be provided on the land directly to the east of the site, on Aylesham Rd, which is within the control of the land owner, as shown on the draft policies map;
- iii Suitable access arrangements and any necessary wider strategic and local highway mitigation measures, including addressing impacts on the A2, B2046, A257 and local roads;
- iv Sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives;
- v Employment opportunities, community facilities, and a new small convenience shop in an accessible location to meet the day-to-day convenience shopping needs of new residents;
- vi Formal and informal open spaces for leisure and recreation, including play areas, sports fields, allotments and community orchards. Spaces will contribute to wider ecological networks and as such, spaces should:
  - be accessible to new and existing communities;
  - provide upgraded routes for walkers and cyclists;
  - improve connections between and enhancements to existing habitats;
  - provide safe routes for wildlife, protecting and enhancing wildlife assets.
- vii Protection and enhancement of heritage assets and their settings through appropriate mitigation measures;
- viii Protection and enhancement of the area of ancient woodland identified on site (Ackholt Woods). This should include a 15 metre buffer zone around the wood;
- ix Landscaping and planting, including a generous landscape buffer to the south and west to minimise visual impact on the surrounding landscape;
- x Sustainable drainage;
- xi Necessary utilities, including integrated communications infrastructure to facilitate home-working.
- xii Financial contributions towards the delivery of required off-site infrastructure and community facilities in accordance with Strategic Policy 13.

In order to ensure that each site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan, and will not prejudice the implementation of the site as a whole.

The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.

## Eythorne and Elvington Local Centre

**6.105** Eythorne and Elvington are located to the north of the District, between the A2 and A256. Both settlements are within the Parish of Eythorne which at the 2011 census had a population of 2,594. The closest train station is approximately 2 miles away in the Local Centre of Shepherdswell.

**6.106** Eythorne has two parts, each with their own Settlement Confines, bisected by the East Kent Light Railway Line. This heritage railway line was originally built to serve the colliery at Tilmanstone and link to the mainline, and now provides a two mile long tourist service to Shepherdswell. The larger part of the settlement contains a conservation area. This designation overlaps with the boundary of the Historic Park and Garden designation covering Waldershare Park, which is located immediately to the south of Eythorne.

**6.107** Elvington, which was mostly built in the early twentieth Century to serve the nearby coal mine at Tilmanstone, is located approximately 300 metres to the north of Eythorne, and has its own settlement confines.

**6.108** Eythorne has a number of services and facilities including two village halls, a primary school (which also serves Elvington), two churches, three public houses/cafes, a post office, village shop and a playground. Elvington has a village hall and church, a small parade of shops (with hairdressers and takeaways) and a recreation ground. To the north east of the two settlements lies the Pike Road Industrial Estate which offers a mix of units of varying age; current occupiers include road haulage companies and Tilmanstone Salads.

**6.109** Eythorne and Elvington are currently identified as villages in Policy CP1 of the Core Strategy (2010). However the recent Settlement Hierarchy study conducted by the Council shows that both these settlements score well in relation to the number of services and facilities provided. Given this, as part of the Council's strategy for the rural area it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District.

**6.110** Through the Housing and Economic Land Availability Assessment work the Council has identified an area of land between Eythorne and Elvington for the delivery of approximately 350 new homes (HELAA Refs: EYT003, EYT009, EYT012). Strategic Policy 7 allocates the land to the east of Adelaide Road for development in accordance with the growth and settlement strategy of the Plan. Whilst it is recognised that constraints do exist on this site, primarily in relation to the cumulative impact upon the local road network, work is on-going to address this and develop an appropriate mitigation scheme.

**6.111** To support the delivery of the Local Plan the council is working with key stakeholders to produce an Infrastructure Delivery Plan. This is an iterative document that sets out the infrastructure required to support the planned development set out within this Plan. As part of the Regulation 18 consultation on the draft Local Plan the council will be engaging with infrastructure providers, on site specific infrastructure requirements. These comments will be used to inform the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be published as part of the Regulation 19 consultation on the Local Plan.

## Strategic Policy 7: Eythorne and Elvington Local Centre

An extension is planned to Eythorne and Elvington to create a new sustainable community, incorporating garden village principles.

Land is allocated to the east of Adelaide Road to deliver approximately 350 new homes over the Plan period.

A masterplan is required for the site to set out the quantum and distribution of land uses, access, sustainable design and layout principles. This should be prepared by the land owners (of which one is the Council), working with key stakeholders. Any application for development should be preceded by, and consistent with, the agreed Masterplan.

In accordance with the relevant Local Plan policies the site will provide:

- i A wide mix of housing types, sizes and tenures, including affordable housing; housing for older people; and serviced plots of land to contribute towards meeting evidenced demand for self-build and custom housebuilding;
- ii Suitable access arrangements and any necessary wider strategic and local highway mitigation measures;
- iii Sustainable transport measures including the improvement of pedestrian links, cycle paths, passenger transport and community transport initiatives;
- iv Community facilities, and a new small convenience shop in an accessible location to meet the day-to-day convenience shopping needs of new residents;
- v Formal and informal open spaces for leisure and recreation, including play areas, allotments and community orchards. Spaces will contribute to wider ecological networks and as such, spaces should:
  - be accessible to new and existing communities;
  - provide upgraded routes for walkers and cyclists;
  - improve connections between and enhancements to existing habitats;
  - provide safe routes for wildlife, protecting and enhancing wildlife assets.
- vi Protection and enhancement of heritage assets and their settings through appropriate mitigation measures;
- vii Landscaping and planting;
- viii Sustainable drainage;
- ix Necessary utilities, including integrated communications infrastructure to facilitate home-working.
- x Financial contributions towards the delivery of required off-site infrastructure and community facilities in accordance with Strategic Policy 13.

In order to ensure that each site is planned and delivered comprehensively, any application for development on part of the site will be assessed against its contribution to the masterplan, and will not prejudice the implementation of the site as a whole.

The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.

## Non-Strategic Housing Allocations

**6.112** To deliver the Councils identified housing need a number of site allocations are proposed, in accordance with the housing growth strategy set out above:

### Housing Allocations

**6.113** In addition to the Strategic Housing Allocations set out above, the Council will also allocate non-strategic housing sites to deliver 3,821 new homes, to meet the housing target.

**6.114** The proposed non strategic housing allocations are informed by the sites identified in the Housing and Economic Land Availability Assessment (HELAA). Sites have been selected in accordance with the council's preferred option for the distribution of housing growth (as set out above), based on their suitability, availability, and achievability. Where constraints have been identified on sites, it is considered that these can be mitigated and the policy sets out a number of key considerations for each site, that will need to be addressed when taking the site forward.

**6.115** To support the delivery of the Local Plan the council is working with key stakeholders to produce an Infrastructure Delivery Plan. This is an iterative document that sets out the infrastructure required to support the planned development set out within this Plan. As part of the Regulation 18 consultation on the draft Local Plan the council will be engaging with infrastructure providers, on site specific infrastructure requirements. These comments will be used to inform the Infrastructure Delivery Plan. The Infrastructure Delivery Plan will be published as part of the Regulation 19 consultation on the Local Plan.

**6.116** The Council's proposed non strategic housing site allocations are set out below, and identified on the policies map. These need to be considered in conjunction with the Strategic Housing Allocations set out above (see policies SP4 Whitfield Urban Expansion, SP5 North Aylesham, SP6 South Aylesham and SP7 Eythorne and Elvington).

### Site Allocations Policy 1 Non Strategic Housing Allocations

In addition to the Strategic Housing Allocations identified in Policies SP4, SP5, SP6 and SP7, the following sites, as defined on the policies map, are allocated for housing during the plan period up to 2040. Planning permission will be granted for proposals that:

- i Accord with the policies in the Local Plan; and
- ii Address the key development considerations for each site.

The phasing for development is set out within Appendix 2 and is based on site availability, identified constraints and progress towards gaining planning consent.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
ALK003	Land at Short Lane, Alkham	0.32	10	Medium	Site in AONB and KCC Minerals area.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Existing tree's should be retained and a landscape buffer is required.
ASH003	Land south of Mill Field, Ash	0.40	8	Medium	Archaeological Assessment required. A landscape buffer is required.
ASH004	Land to the north of Molland Lane, Ash	4.48	110	Long	Transport Assessment and Heritage Assessment required. A landscape buffer is required. Vehicular access to be provided from Chequer Lane.
ASH010	Land adjacent to Saunders Lane, Ash	3.40	76	Short	Heritage Assessment required. A tree survey would be required and existing trees should be retained where possible.
ASH011	Gulton, Ash	0.35	10	Medium	Heritage Assessment and Land contamination assessment required. A landscape buffer is required.
ASH014	Land to the south of Sandwich Road, Ash	3.34	63	Short	Heritage Assessment and Land Contamination Assessment required. Vehicular access from Sandwich Road. No vehicular access from Cherry Garden Lane. Existing boundary hedgerows and vegetation to be retained and enhanced.
ASH015	Former Council Yard, Molland Lea, Ash	0.16	5	Medium	Land Contamination Assessment required.
AYL001	Land at Dorman Avenue, Aylesham	0.31	9	Medium	Archaeological Assessment required.
AYL002	Land at the Boulevard, Aylesham	0.61	17	Medium	Archaeological Assessment required.
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	4.02	50	Short	Transport Assessment and Archaeological Assessment required.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					<p>Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed.</p> <p>Development should be set back from the existing residential properties.</p> <p>A landscape buffer is required between the site and the AONB to the North West.</p> <p>Vehicular access to be provided from Capel Street</p> <p>The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.</p>
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	0.66	10	Medium	<p>Archaeological Assessment required.</p> <p>Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed.</p> <p>A landscape buffer is required to mitigate impact on the adjacent AONB.</p>
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	0.57	18	Medium	<p>Site in AONB. Existing trees and hedgerow should be retained wherever possible and a generous landscape buffer will be required.</p> <p>Archaeological Assessment required.</p>
CAP013	Land at Cauldham Lane, Capel-le-Ferne	0.76	15	Medium	<p>Archaeological Assessment required.</p> <p>Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed.</p>

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Landscape buffer required to mitigate impact on the adjacent AONB.
DEA008	Land off Cross Road, Deal	8.73	100	Medium	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. A landscape buffer is required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
DEA018	Church Lane/Hyton Drive, Deal	0.48	18	Short	Archaeological Assessment required. KCC minerals area.
DEA020	Land off Cross Road, Deal	4	100	Medium	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed. A landscape buffer is required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
DEA021	Land off Freeman's Way, Deal	3.69	88	Short	Archaeological Assessment and Land Contamination Assessment required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of



Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
DOV006	Land at Dundedin Drive, Dover	0.37	8	Medium	Archaeological Assessment required. Existing trees should be retained where possible.
DOV008	Land adjoining 455 Folkestone Road, Dover	0.34	5	Short	Site in AONB. A landscape buffer is required to mitigate any impact on the AONB.
DOV009	Land at Stanhope Road, Dover	0.82	32	Short	Archaeological Assessment required.
DOV012	Former Channel Tunnel Workers Accommodation, Farthingloe, Dover	11.62	100	Medium	Heritage Assessment and Land Contamination Assessment required Site in AONB and KCC Minerals area. A comprehensive landscaping scheme and landscape buffer will be required to mitigate impact on the landscape.
DOV017	Dover Waterfront	10.98	200	Long	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. An assessment of air quality, noise, vibration and light pollution will also be needed, and a mitigation strategy required. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. KCC Minerals area
DOV018	Dover Mid Town	5.99	100	Long	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. Development should be set back from the River Dour.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Mitigation required to address air quality issues identified in the Air Quality Study. KCC Minerals area
DOV019	Albany Place Car Park, Dover	0.28	15	Medium	Heritage Assessment required.
DOV022B	Land adjacent to the Gas Holder, Coombe Valley, Dover	0.91	40	Medium	Transport Assessment and Land Contamination Assessment required.
DOV022C	Land between Coombe Valley Rd and Primrose Rd, Dover	0.37	20	Medium	Transport Assessment and Land Contamination Assessment required.
DOV022E	Land at Barwick Rd Industrial Estate, Coombe Valley, Dover	3.69	220	Medium	Transport Assessment and Land Contamination Assessment required.
DOV023	Buckland Paper Mill, Dover	2.38	124	Short	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment required. KCC Minerals area. Mitigation required to address air quality issues identified in the Air Quality Study.
DOV025	Land off Wycherley Crescent, Dover	0.54	10	Medium	Site is covered by two Local Wildlife sites - mitigation will therefore be required.
DOV026	Westmount College, Folkestone Road, Dover	1.43	100	Medium	Land Contamination Assessment required.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Existing trees should be retained where possible, and screening should be provided at the boundary. Better links should be provided through the site to connect with the public open space to the north.
DOV028	Charlton Shopping Centre, High Street, Dover	0.63	100	Medium	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment required. Site in a KCC Minerals area.
DOV030	Land at Durham Hill, Dover	0.34	10	Short	Heritage Assessment and Land Contamination Assessment required. Site is open space.
EAS002	Land at Buttsole Pond, Lower Street, Eastry	3.93	80	Medium	Transport Assessment and Heritage Assessment required. A generous landscaping scheme and landscape buffer will be required to mitigate impact on the countryside. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
EAS009	Eastry Court Farm, Eastry	0.84	5	Medium	Heritage Assessment required. Existing trees should be retained where possible.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
EAS012	Lower Gore Field, Lower Gore Lane, Eastry	3.97	35	Long	Transport Assessment and Archaeological Assessment required. Site in a KCC Minerals area. A significant landscape buffer will be required along the north west boundary of the site. This area should remain un-developed. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
EYT001	Land at Monkton Court Lane	1.94	20	Short	Transport Statement, Heritage Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed. A landscape buffer will be required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Mitigation required to address air quality issues identified in the Air Quality Study.
EYT008	Land on the south eastern side of Roman Way, Elvington	1.65	50	Short	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Existing trees and hedgerow should be retained where possible and a generous landscaping scheme should be provided.
EYT019	Land to east of Adelaide Road, Eythorne	0.27	6	Medium	Archaeological Assessment required Site in a KCC Minerals area. A landscape buffer is required.
GOO006	Land adjacent to Short Street, Chillenden	1.02	5	Medium	Heritage Assessment and Land Contamination Assessment required. Suitable for executive homes. A generous landscaping scheme is required.
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10	Medium	Heritage Assessment required. A generous landscaping scheme is required.
GUS002	Connaughts Barracks, Dover	54.98	300	Short	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. A landscaping scheme is required to mitigate the views of and from nearby heritage assets. Impact on LWS should be mitigated The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Mitigation required to address air quality issues identified in the Air Quality Study.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	3.46	90	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. A generous landscaping scheme is required to mitigate impact on the adjacent AONB. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	4.68	40	Medium	Transport Assessment and Archaeological Assessment required. Impact on local road rural network to be addressed. A generous landscape buffer should be provided along the northern boundary of the site and this land should remain undeveloped. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	2.18	65	Medium	Transport Assessment and Heritage Assessment required. Impact on Canterbury Road/Church Lane junction to be addressed. Existing trees and hedgerow should be retained where possible and a generous

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					landscaping scheme is required to mitigate impact on the countryside. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Mitigation required to address air quality issues identified in the Air Quality Study. Environmental Assessment Study required to address any potential impact on the Lydden Hills SAC
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	1.14	35	Medium	Heritage Assessment and Land Contamination Assessment required. Existing boundary screening should be retained and enhanced. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
NOR005	Betteshanger Colliery, Betteshanger, Deal	20.69	210	Short	Archaeological Assessment, Transport Assessment, Land Contamination Assessment and Habitats Surveys required. Cumulative highways impact to be addressed. Impact on biodiversity, including priority habitats to be mitigated on/or off-site.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Part of site access in Flood Zones 2 and 3. Flood Risk Assessment required. Site in a KCC Minerals area. Landscape and Visual Impact Assessment required - existing boundary screening/tress should be retained and enhanced to provide a generous landscape buffer. Environmental Assessment Study required to address any potential impact on the Sandwich Bay RAMSAR
PRE003	Apple Tree Farm, Stourmouth Road	0.76	12	Medium	Transport Assessment required.
PRE016	Site north of Discovery Drive, Preston	1.10	35	Medium	Transport Assessment and Land Contamination Assessment required. Site borders Flood Zone 3. Access to be provided through adjacent sites.
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	2.53	75	Medium	Transport Assessment and Land Contamination Assessment required. Access to be provided through adjacent sites. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
RIN004	Ringwould Alpines, Dover Road, Ringwould	0.22	5	Short	Archaeological Assessment required. Existing trees and hedgerows should be retained and enhanced.



Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	2.10	32	Medium	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. Site in Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	1.58	80	Medium	Transport Assessment and Heritage Assessment required. Cumulative highways impact to be addressed. Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required. Existing screening should be retained and enhanced.
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.7	35	Medium	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	3.43	60	Medium	Site allocated for housing and the expansion of the Sandwich Sports and Leisure Centre. Transport and Heritage Assessment required. Cumulative highways impact to be addressed. Existing screening should be retained and enhanced.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
SAN015	Kumor Nursery, Sandwich	2.40	67	Short	Transport Assessment required. Cumulative highways impact to be addressed. KCC Minerals area.
SAN019	Sydney Nursery, Dover Road, Sandwich	0.38	10	Medium	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	2.19	40	Medium	Transport Assessment and Heritage Assessment required. Cumulative highways impact to be addressed. Site is clipped by Flood Zone 2 and 3 along the boundary. Flood Risk Assessment required. Existing boundary screening should be retained and enhanced. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					Environmental Assessment Study required to address any potential impact on the Sandwich Bay SPA and RAMSAR.
SHE003	Land to the north of Westcourt Lane, Shepherdswell	9.55	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. A comprehensive landscape buffer will be required to mitigate impact on the adjacent LWS. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Mitigation required to address air quality issues identified in the Air Quality Study.
SHE004	Land to the north and east of St Andrew's Gardens, Shepherdswell	4.31	40	Short	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed. A sensitive landscaping scheme will be required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
SHE006	Land at Botolph Street Farm, Shepherdswell	0.82	20	Medium	Heritage Assessment required. Cumulative highways impact to be addressed.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					A landscape buffer is required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
SHE008	Land off Mill Lane, Shepherdswell	0.38	10	Medium	Archaeological Assessment required. Cumulative highways impact to be addressed.
SHO002	Land at South West of Sandwich Road, Sholden, Deal	5.26	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. A generous landscaping scheme and landscape buffer is required. Given the relationship of this site with SHOO004 the Council will expect the landowners to work together to ensure a co-ordinated approach is taken to the development of these sites particularly in relation to access and landscaping. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Environmental Assessment Study required to address any potential impact on the Sandwich Bay RAMSAR

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
SHO004	Land adjoining Pegasus, Sandwich Road, Sholden	1.21	42	Short	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed. A generous landscaping scheme and landscape buffer is required. Site within KCC Minerals area Given the relationship of this site with SHOO002 the Council will expect the landowners to work together to ensure a co-ordinated approach is taken to the development of these sites particularly in relation to access and landscaping. Environmental Assessment Study required to address any potential impact on the Sandwich Bay RAMSAR
STA004	Land at Durlock Road, Staple	0.24	3	Short	Heritage Assessment required. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	1.78	40	Short	Part of the site lies within the AONB and Heritage Coast. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Transport Statement and Land Contamination Assessment required.
STM006	Land at New Townsend Farm, Station Road, St Margarets	1.32	10	Medium	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Archaeological Assessment required. Suitable for executive homes.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B)	0.63	18	Short	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Existing trees and hedgerow should be retained where possible. Heritage Assessment required.
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)	0.63	18	Short	Site is partly in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Existing trees and hedgerow should be retained where possible. Heritage Assessment required.
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	4.44	100	Medium	Transport Assessment and Archaeological Assessment required. Cumulative impact on road network to be addressed. A landscape buffer will be required. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required.
WHI006	Guide Hut, Sandwich Road, Whitfield	0.24	8	Medium	Existing trees and hedgerow should be retained where possible.
WIN003	Land adjacent to Staple Road	0.83	20	Short	Transport Assessment required. Cumulative impact upon road network to be addressed, including Adisham Road/Staple Road and Adisham Road/A257 junction. KCC Minerals area.

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
WIN004	Land adjacent to White Lodge, Preston Hill	0.31	8	Short	Heritage Assessment and Land Contamination Assessment required. A landscape buffer is required.
WIN014	Footpath Field, Staple Road, Wingham,	3.60	50	Short	Transport Assessment required. Cumulative impact upon road network to be addressed, including Adisham Road/Staple Road and Adisham Road/A257 junction. Site in a KCC Minerals area. A sensitive landscaping scheme in addition to a generous landscape buffer will be required to mitigate impact. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will exceed the threshold of significance mitigation will be required. Mitigation required to address air quality issues identified in the Air Quality Study.
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	0.73	5	Short	Archaeological Assessment required. Site in KCC Minerals area.
WOO006	Land south of Sandwich Road, Woodnesborough	1.27	10	Short	Archaeological Assessment required. Existing trees and hedgerow should be retained where possible. The HRA has identified the need for a wintering bird survey to be undertaken on this site as part of any future planning application. If the bird survey identifies that proposed new development will

Site Reference Number	Site	Site Size (hectares)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations
					exceed the threshold of significance mitigation will be required.
WOR006	Land to the east of Jubilee Road	0.56	10	Medium	Heritage Assessment required. Site adjacent to Flood zones 2 and 3. Site in a KCC Minerals area. A landscape buffer will be required. Environmental Assessment Study required to address any potential impact on the Sandwich Bay RAMSAR
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	0.83	20	Short	Heritage Assessment required. Existing boundary treatment should be retained and enhanced.

Table 6.3

## Gypsy and Traveller Site Allocations

**6.117** The largest existing permitted site assessed with availability and capacity for further intensification has been deemed appropriate for allocation. The site is located close to the south west of Alkham's designated settlement area and benefits from a well-maintained access and footpath leading into village. Sitting in a small valley the site is contained with tree lines to the east, south and west and Alkham Valley road to the north. The established pitches are located in the south of the site with the remainder site being tended grassland and an access road. It is considered that the impact of site intensification can be accommodated through increasing the number of trees providing screening along the east, south and western boundaries and that the impact on the valleys landscape will be minimal through sensitive layout of the new pitches.

**6.118** The allocating of this site will ensure that part of the established Gypsy and Traveller need can be met on an identified site that has planning permission. The setting of policy criteria as detailed below, will also ensure that appropriate levels of mitigation are achieved for the intensification proposed. The Councils evidence at present, doesn't identify a need for transitional pitches for those of the community who continually roam. However, this site allocation has capacity to accommodate 2 pitches for any transitional pitch need that may occur in the future.



## Site Allocations Policy 2 Land to the south of Alkham Valley Road / Land to the rear of The Meadows, Alkham

Proposals for up to an additional 10 permanent and 2 transitional pitches will be supported at Land to the south of Alkham Valley Road / Land to the rear of The Meadows, Alkham, as shown on the policies map subject to the following criteria:

- i The total capacity of the site does not exceed 18 permanent and 2 transit pitches;
- ii A landscaping scheme for the site is provided which retains and improves vegetation along the site boundary including tree planting to mitigate the impact on the landscape and AONB.
- iii The positioning of additional hardstanding and the siting of pitches minimise the visual impact on the AONB.
- iv Widening of the site access from Alkham Valley Road is provided to ensure that a car turning right can pass a car waiting to exit the site and a towed caravan can turn in/out in a single manoeuvre;
- v All foul water drainage is linked to the mains sewer;
- vi Suitable pollution measures are provided for surface water runoff from vehicle hardstanding; and,
- vii Fuel storage for generator sets are compliant with oil storage regulations and best practice.

## Gypsy and Traveller Site Intensification

**6.119** To help meet the established Gypsy and Traveller need and to provide identified sites for future growth, existing permitted and tolerated sites have been assessed for their availability and capacity to accommodate additional pitches. Intensification will be deemed permissible provided it is within the criteria of the policy set out below.

### DM Policy 10 Gypsy and Traveller Site Intensification

Proposals for additional pitches on sites identified as suitable for intensification will be supported subject to the following criteria:

- i The proposals do not exceed the identified additional pitch capacity set out in the following table;
- ii It can be demonstrated that infrastructure requirements can be adequately met on site and not affect the amenities of nearby properties; and
- iii The intensification of the site can be adequately screened.

Site Address	Additional Pitches
Plot 1A, Land at Hay Hill (The Oaklands), Ham, Eastry, CT13 0ED	2
Plot 2B Land at Hay Hill (Bluebell Place), Ham, Eastry, CT13 0ED	1
Plot 3 Land at Hay Hill (Strawberry Place), Ham, Eastry, CT13 0ED	2
Romany Acres, Belsey Lane, Ewell Minnis, CT15 7DY	4

Table 6.4

## Draft development management policies and supporting text

### Type and Mix of Housing

**6.120** The housing needs of the various community groups and the emerging population trends and demographics have been assessed through the latest Strategic Housing Market Assessment (SHMA) for the District. To meet the projected local housing needs for the District, the assessment goes on to set out the dwelling size, household type and tenures that are required to be built over the plan period.

**6.121** The SHMA partial update December 2019 projects that by 2040 the population of the District will have grown by nearly 19,000 persons. Chart 6.2 below illustrates that the age groups 60-75 and over 75s are projected to be the major contributors to the Districts population growth and will account for nearly 16,000 persons. The SHMA update also projects the growth of nearly 12,000 households by 2040 and that approximately half of the new households will come from one person formations (chart 6.3).

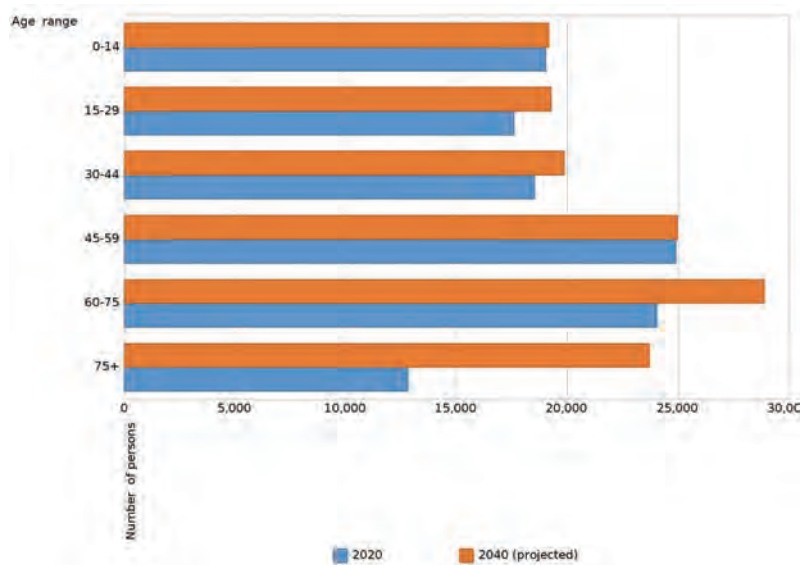


Figure 6.1

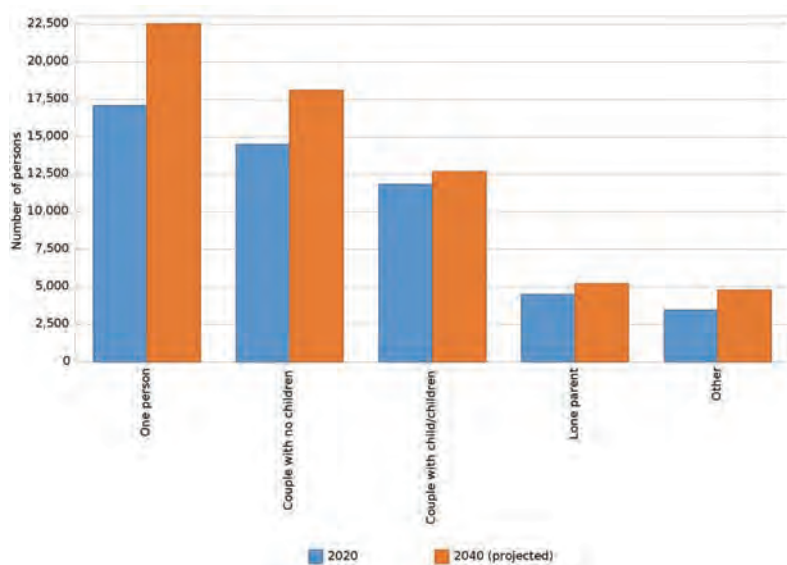


Figure 6.2

**6.122** Using the latest local housing need for the District and being considerate of projected demographic and household changes, the SHMA update states that 73.1% of the dwellings built should be market housing, 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent. The SHMA also prescribes that 576 units of housing for older people and 66 units of housing with care should be provided within the identified need. Detail is also given within the SHMA on the dwelling sizes by tenure, with an overall mix sought of: 12.2% from one bedroom; 20.4% from two bedrooms; 35.2% from three bedrooms; and, 32.2% four or more bedroom dwellings.

**6.123** The SHMA 2019 also identifies a need for 990 additional spaces of Registered Care for housing those aged 65 and over between 2020 and 2040. This forms part of the institutional population and is in addition to the housing supplied within the local housing need identified above.

**6.124** The Councils Authority Monitoring Report will review annually over the plan period the mix of tenures and size of dwellings being granted planning permission. The review will assess: whether the targets of the SHMA are being met; and, identify any trends of over or under provision that may develop. Changes in the local housing need will be identified through review of the plan and subsequent updates to the SHMA.

## DM Policy 11 Type and Mix of Housing

Proposals for development of 10 or more dwellings will be required to provide housing that contributes towards a mix of market and affordable housing types and sizes including meeting the needs of different age groups as set out within the latest Strategic Housing Market Assessment for the District. The proposal should also consider the progress being made towards the targets in the SHMA as set out within the Council's Authority Monitoring Report.

Where it is not possible to provide the full range of housing types and sizes on a development, then evidence of any physical, locational, developmental and local needs constraints will be required to justify departing from the required need.

Development proposals for standalone older persons housing or other specialist housing are exempt from this requirement and will be supported in principle where the need has been identified by extensive and robust evidence, and where they can be located in a suitable and sustainable way.

## Affordable Housing

**6.125** The Local Plan Whole Viability Study has tested a number of viability scenarios with differing thresholds and tenure splits in order to ascertain the most appropriate and deliverable levels of affordable housing within the district. The study has concluded that within the Dover Urban Area it is not viable to provide affordable housing. The strategy for Dover Urban Area is therefore to require a nil provision of affordable housing in order to ensure viability of schemes coming forward within the plan period in this area. This includes not being able to meet the National Planning Policy Framework (Feb 2019) requirement for 10% affordable home ownership.



Picture 6.2

**6.126** It is considered for the rest of the district that a 30% requirement for affordable housing is viable for the majority of sites. The most recent Strategic Housing Market Assessment (2017), stipulates a tenure mix of 5.1% Starter homes, 5.8% shared ownership and 16.0% affordable rent. At the time of writing, Government's proposals for First Homes are emerging, and it is expected that a requirement will be brought in that requires a certain percentage (currently 25%) of the total affordable housing provision to be provided as first homes. This is expected to replace the requirement for Starter Homes and is likely to reduce the proportion of the shared ownership requirement. The percentages tested within the Local Plan Whole Viability Study have concluded that the tenure split of 65% affordable rent and 35% affordable home ownership are deliverable and in accordance with the housing need for the district. These are the percentages which will be used for the purposes of the Affordable Housing policy, which satisfies the National Planning Policy Framework (Feb 2019) requirement for 10% affordable home ownership to be delivered on sites as well as the ability to deliver 25% First Homes as a proportion of the 35% affordable home ownership requirement.

**6.127** In terms of the housing need for wheelchair users, this is set at a proportion of the affordable rented units, for which there are nomination rights from the Housing Register and detailed in DM Policy 37.

**6.128** The threshold for the Designated Rural Areas is set at 6 dwellings or more for the following development located in the following parishes: Alkham, Ash, Capel-Le Ferne, Denton with Wootton, Eythorne, Goodnestone, Guston, Hougham without, Preston, Ringwold with Kingsdown, Ripple, Shepherdswell with Coldred, Sholden, St Margarets at Cliffe, Staple, Tilmansonte, Wingham, Woodnesborough, Worth, Temple Ewell and Lydden.

**6.129** It is presumed that affordable housing requirements are met on site. If independently verified viability evidence submitted to accompany a planning application, highlights any viability issues, this will be considered in accordance with the policy in first looking to consider on a case by case basis flexibility as set out in the policy in terms of tenure, reduction of overall proportions, an off site contribution, a combination of these, or a deferred contribution.

**6.130** For the purposes of planning applications received by the council, planning policy and planning legal agreements the Council will use the affordable housing terms within the National Planning Policy (Feb 2019) Annex 2.

## DM Policy 12 Affordable Housing

1. The Council require the provision of affordable housing on schemes of 10 dwellings or more (and on sites of 0.5 hectares or more), and in Designated Rural Areas, on schemes of 6 dwellings or more, with provision being not less than 30% of the total housing provided on the site. This is with the exception of Dover Urban Area as set out on the policies map, where there will be no requirement for affordable housing to be provided.

The affordable housing shall be provided with a tenure split of 65% affordable rent and 35% affordable home ownership. All proposals are expected to meet their full affordable housing provision on site.

2. Should independently verified viability evidence establish that it is not possible to deliver the affordable housing as required by this policy, and the viability position is agreed by the Council, the Council will consider on a case by case basis flexibility in the provision of affordable housing, including through the following options:

- i Change in the tenure mix required.
- ii Reductions in the overall proportion of affordable housing.
- iii Provision of an off site financial contribution in lieu of affordable housing provision on site, to secure equivalent provision of affordable housing off site.
- iv A combination of the above.
- v Deferred contributions.

If a site come forward as two or more separate schemes, of which one or more falls below the appropriate threshold, the Council will seek an appropriate level of affordable housing on each part to match in total the provision that would have been required on the site as a whole.

## Rural Local Needs Housing

**6.131** Given the lower levels of housing supply in rural areas, affordability has historically been a particular issue in rural parishes, resulting in people with employment or family ties to a village being unable to find housing there that they can afford. In order to address such specific housing need, the development of low cost, local needs housing in rural areas, on land that would not ordinarily be acceptable for housing development and therefore where planning permission would not otherwise be granted, is supported at national level. Such housing must remain affordable in perpetuity, i.e. below prevailing market value, for either sale or rent, to meet an identified local need. To achieve this, occupiers should be prevented from being able to own Local Needs dwellings outright. Such schemes are therefore usually managed by a registered social landlord.

**6.132** The need for such schemes will arise from circumstances unique to a parish. It will therefore be the responsibility of the Parish Council, or relevant local community organisation, to identify the extent and type of need for such housing (which may include the need of adjacent parishes) for those with genuine and proven local connections. It is expected that the Parish Council will play an integral role in the development of such schemes, including involvement with the administration of a local housing needs survey. The format of such surveys will need to be agreed with the District Council's housing department in the first instance.

**6.133** As such developments come forward as exceptions to other policies and are restricted to this particular form of housing, the value of the land will be substantially lower than that of market housing land. Furthermore, such exception schemes are supported by grant funding, usually from Homes England. It is therefore the low cost of the land and the availability of grant funding which enables such housing developments to be affordable and should not be the built quality of the development, which is expected to be of a high standard, compliant with the design policies of this Plan.

**6.134** In assessing the scale and extent of any proposed local needs housing, account should be taken of affordable housing already planned in the parish or nearby area, including sites with existing planning permissions and sites allocated in this Local Plan. In addition, it will be particularly important, given the exceptional nature of such schemes, that the landscape setting of the proposed site, suitability of the local road network and amenity of any nearby residents underpin the design, layout and scale of any scheme proposed.

**6.135** The NPPF requires that planning authorities consider whether allowing open market housing on such sites would help facilitate the delivery of local needs housing. With low land cost and grant funding available, there should be no need for market housing to make a scheme viable, unless there are particularly abnormal site costs. In order to control sporadic development in the countryside and to maintain the primary objective of meeting rural affordable housing need, the Council will therefore only permit an element of cross subsidy on rural exception sites in exceptional circumstances, and where there is a proven viability issue. In such instances, the applicant will be required to provide an open book viability assessment which will be rigorously assessed by an independent adviser appointed by the District Council. To avoid such exception sites being dominated by market housing, in conflict with the policies of this Plan, and in order to ensure efficient use of exception site land any market housing should be kept to a minimum and should only comprise two bed houses, bungalows, small 2/3 bed self-build plots or such specific adapted small properties as the Housing Needs Survey may identify. Development of cross-subsidy sites will not be regarded as creating a precedent for future expansion of rural settlements to meet general housing requirements.

## **DM Policy 13 Rural Local Needs Housing**

Proposals for local needs housing in the rural area beyond a settlement's identified confines will be supported provided that:

- a. The local need is clearly evidenced in a comprehensive Local Needs Housing Survey of the parish or where appropriate, of adjacent parishes, prepared by, or in consultation with, the Parish Council; and
- b. The development is well designed and is appropriate in scale, layout and materials to the character and appearance of the area and of nearby settlements, and will not have a significant or adverse impact on the living conditions of any adjoining residents or the local road network; and
- c. The development is of a suitable scale taking account of the affordable housing already planned in the parish or nearby area, type and tenure, and will be available at an appropriate cost to meet the identified need; and
- d. Initial and subsequent occupation is controlled through legal agreements to ensure that the accommodation remains available to meet the purposes for which it was permitted in perpetuity.

Proposals which promote market housing as a means of enabling local housing need will not normally be supported as it is expected that all local needs housing schemes coming forward will be delivered without the need for cross market subsidy. Where this is not possible, evidence including a robust financial viability assessment, which will be assessed by independent advisers, will need to be submitted as part of an application.

Should a viability case be proven, the enabling market housing element should be the minimum required to make the scheme viable, and should only comprise 2 bed houses, bungalows, small 2/3 bed self-build plots or such specific adapted small properties as the Housing Needs Survey may identify. Any market housing should be comparable in design to the local needs housing on the site.

## Gypsy and Traveller Windfall development

**6.136** The provision of Gypsy and Traveller accommodation is a specific community need that the Council has a duty to provide for. The Gypsy and Traveller Accommodation Assessment (GTAA 2018) analysed the latest available evidence to identify the accommodation needs of Gypsies and Travellers, Travelling Showpeople and houseboat dwellers from across the District.

**6.137** The GTAA 2018 established two types of pitch need within the District. The first is defined by the Planning policy for traveller sites (PPTS), which was published by the Government in August 2015. The document sets out the definition of 'Gypsies and Travellers' and Travelling Showpeople and defines that Gypsies and Travellers live on pitches on sites, and that Travelling Showpeople live on plots on yards. The second considered was a 'cultural' definition of Gypsies and Travellers and Travelling Showpeople which is based on households identifying as a Gypsy and Traveller /Travelling Showperson but do not meet the travelling clarification of the PPTS. In effect, this second approach accords with the Housing and Planning Act 2016 section 124 which considers the needs of households living in caravans.

**6.138** The GTAA 2018 established a 'cultural' need for 30 pitches and a PPTS need for 18 pitches. This results in an annualised cultural need of 1.3 pitches and PPTS need of 0.8 pitches. The GTAA 2018 concludes that by taking into account: potential turnover on local authority sites and opportunities for additional capacity, this would result in a residual cultural need for 12 pitches and PPTS need is addressed.

**6.139** In January 2020, the Gypsy and Traveller accommodation need was updated to the plan period 2020 to 2040. By applying the annualised needs figures this resulted in a revised cultural need for 26 pitches and a PPTS need for 16 pitches. The overall reduction in need took account new pitch supply since the GTAA 2018. The update concludes that after known pitch turnovers and intensification of permitted sites there will be a residual need to provide an additional 13 pitches. This residual need that will be met through the allocation of a new site as part of the strategic allocation in south Aylesham and from a potential new site or sites identified through the next Call for Sites exercise.

The need for pitches over the plan period will be met through identified sites for turnover, intensification and allocation. Vacancies on permitted and tolerated sites known as turnover, are identified in the GTAA, and have been confirmed to make a contribution of 10 pitches to the need. The occupations and remaining vacancies on the turnover sites, will be published annually as part of updating the Councils Gypsy and Traveller land supply. However, there will be circumstances where planning applications will be submitted on sites not identified through the Local Plan. In those types of situation, criteria will need to be set out to inform appropriate development to meet the needs of the Gypsy and Traveller community.

## DM Policy 14 Gypsy and Traveller Windfall Accommodation

Proposals for Gypsy and Traveller accommodation on windfall sites will be supported where all of the following apply:

- i It can be demonstrated that the proposal cannot be accommodated at a site allocated or identified for intensification within this plan or on an identified turnover site;
- ii The site is accessible to schools, health and local services;
- iii The site has good access to the road network;
- iv Development would not result in significant harm to the landscape and character of the area,
- v It can be demonstrated that infrastructure requirements can be adequately met on site and not affect the amenities of nearby properties; and,
- vi The site can be adequately screened.

Only criteria (d) and (e) are required to be met for the expansion of existing permitted gypsy and traveller sites.

### Self Build and Custom House Building

**6.140** Self build and custom house building is a specific community housing need that goes beyond the considerations of type and tenure set out within the SHMA. The specific need is supported through the [Self-build and Custom Housebuilding Act 2015 \(as amended by the Housing and Planning Act 2016\)](#). The act provides a legal definition of Self and Custom build housing, and sets out how the need is prescribed by the use of a register, and the duty that is placed on a Local Authority to grant enough planning permissions to meet the identified need.

**6.141** The self build and custom house building need as identified from the Council's register is reported annually through the Authority Monitoring Report. In early 2020, the Council relaunched the register to try and gain a more accurate identification of those with a local need for self build and custom house building and who were also financially capable of carrying out a build. A more accurate understanding of this need and the ability to build had become apparent due to a considerable discrepancy between those registering an interest and the number planning applications submitted for self build and custom house building. Between the commencement of the legislation and the relaunch of the Council's register only one planning application had been identified for self build, and that was through an appeal process.

**6.142** In accordance with legislation, the current version of the Council's register requires applicants and associations wishing to register an interest in Self and Custom Build in the district to provide evidence of local connectivity and of being financially solvent to carry out a build. Those who met the evidenced tests and were on the previous version of the register had their interest dated to the previous register. At July 2020 there were 7 individuals and no associations on the Council's Self and Custom Build register.

**6.143** At present, the self build and custom house building need in the District is relatively small compared to other identified housing needs. However, the Council acknowledges that this type of development can offer diversity to the housing market and provide individuals and associations the opportunity to build their own homes, to meet their specific needs and requirements. To those ends the Council will be looking to facilitate self build and custom house building through the granting of planning consents on windfall and allocated sites.



## DM Policy 15 Self Build and Custom House Building

Self build and custom house building is encouraged within allocated sites, designated settlement areas and on other windfall sites which accord with the relevant windfall policies.

Self and Custom Build housing development is to be highly sustainable, of good design, scale and massing and in keeping with the character and appearance of the adjacent built and natural environment.

### Residential Extensions and Annexes

**6.144** The provision of residential extensions and annexes can allow for homes to be adaptive to changing lifestyle and societal needs. These types of residential development can also reduce the need to move home and lower the demand for larger homes. The need for annexes and extensions can include: increases in family size; changes in personal mobility and access requirements; changing working patterns towards an increase in home working; and, the pursuit of home based leisure and fitness activities.

**6.145** Extensions and annexes also offer the opportunity to support the living needs of mobile older persons whilst reducing the premature need to enter into care facilities. The latest SHMA acknowledges that the population is ageing and states that those aged 60 and over will account for 38.7% of the population by 2040 an increase of 7.1% from 2020. The level of housing support and care can change over time for an elderly person and annexes can offer a solution to the those seeking a level of independence whilst also being part of a wider family and extensions can go further providing the opportunity for more close support.

## DM Policy 16 Residential Extensions and Annexes

Residential extensions and annexes will be supported where:

- i The scale, massing and appearance would be in keeping or improve the existing building and the character and appearance of the surrounding area;
- ii The residential amenity of privacy and daylight of any adjoining properties would be safeguarded;
- iii Any additional parking requirement is provided within the curtilage of the dwelling and that the traffic impact of development could be accommodated within the road network.
- iv It would cause not harm to the setting of a heritage asset; and would preserve or enhance the special architectural or historic character and appearance of a conservation area and its setting; and,
- v It does not conflict with any other relevant policies within the plan.

### Houses in Multiple Occupation

**6.146** Houses in multiple occupation (HMOs) are properties which are occupied by unrelated households that share one or more facilities such as a bathroom or kitchen. HMOs can provide useful accommodation, but in many cases the property was not originally designed for such intensive residential use.

**6.147** In 2010 the government introduced a new use class (C4), which covers small shared houses or flats occupied by between 3 and 6 unrelated individuals who share basic amenities. Planning permission is generally not required for a change of use from a dwelling house (C3) to C4, as it is permitted under the General Permitted Development Order (GPDO). Large houses in multiple occupation (those with more than 6 people

sharing) are unclassified by the Use Classes Order, and planning permission is required for a change use of from a C3 or C4 to a large house in multiple occupation. The Council will consider whether there is justification in certain locations to serve Article 4 directions so that changes of use from C3 to C4 would require planning permission and therefore be subject to this policy.

**6.148** An increase in concentrations of HMOs in an area alters the population mix, impacting on the facilities and services that can be supported, as well as affecting residential amenity and social cohesion. It can give rise to noise, nuisance, more callers, a higher parking requirement and visual deterioration of buildings and gardens.

**6.149** The following policy sets out the criteria which will be considered when determining applications for new HMOs or when deciding whether to take enforcement action.

## DM Policy 17: Houses in Multiple Occupation

Proposals for Houses in Multiple Occupation (small or large) will be supported provided that the development:

- i Contributes to creating a mixed, inclusive and sustainable community;
- ii Does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity;
- iii Does not have a significant adverse impact on highway safety, caused by insufficient onsite parking provision, thereby resulting in an unacceptable increase in on street parking; or
- iv Does not have a significant adverse impact on visual amenity, including that from inappropriate or insufficient arrangements for dustbin storage.

Permission granted will normally be subject to a condition that restricts the number of occupants allowed to reside at the property as their main residence.



7

Local economy

7.1 This section sets out the Council's strategy for employment and the local economy and covers:

- What the key issues are in relation to employment and the local economy in the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Economic growth;
  - Strategic employment allocations;
  - New employment development;
  - Retention of existing employment sites;
  - Loss or re-development of employment sites and premises;
  - Home working;
  - Conversion or re-build of rural buildings for economic development purposes;
  - New employment premises in the countryside; and
  - Tourism and tourist/ visitor accommodation.

### What are the key issues to consider?

7.2 From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to employment and the local economy:

7.3 The NPPF (2019) states that local authorities should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth; help create the conditions in which businesses can invest, expand and adapt; support a prosperous rural economy; and be flexible enough to accommodate needs not anticipated in the plan.

### Economic Context and Trends

7.4 Dover has faced a range of economic challenges over recent years which has resulted in a trend of gradual employment decline, particularly during the first ten years of the Core Strategy period (2006 - 2016). As a result the overall job growth target in the Core Strategy of 6,500 jobs by 2026 is yet to be reached. These changes are summarised in the Table below:

Use	2006	2016	Total Change	% Change
<b>Total Workforce Jobs</b>	<b>45,700</b>	<b>41,000</b>	<b>-4,700</b>	<b>-10%</b>
B Class Jobs	15,300	12,200	-3,100	-20%
Office Jobs (B1a/B1b)	5,800	4,700	-1,100	-19%
Industrial Jobs (B1C/B2/B8)	9,400	7,400	-2,000	-21%

Table 7.1

7.5 The District has however performed better over recent periods in terms of a number of other key economic issues identified in the Core Strategy, mainly relating to increasing the overall scale of the local business base, rebalancing the previously polarised resident occupation profile, and improving resident skills. Despite this, Dover does still lag behind regional benchmarks across a number of these indicators, including qualification attainment levels and has the second smallest stock of workforce jobs in Kent.

**7.6** In 2018 the District provided 42,000 jobs, which is an increase of 1,000 jobs from 2016. This equates to a job density of 0.64 (the ratio of jobs to the working population aged 16 – 64), which is well below that for the South East and Great Britain as a whole (Nomis), meaning that there are significantly less jobs than workers living in the District. This highlights the need to improve the attractiveness of the District as a place to locate business.

**7.7** The District has a relatively self contained labour market with the latest Census data indicating a labour self-containment rate of 66.7%, but there continue to be strong commuting flows to and from the adjoining areas of Folkestone and Hythe, Canterbury and Thanet.

**7.8** Dover's employment floorspace is dominated by industrial uses, which benefit from the presence of the A2 and links with the strategic road network. The largest clusters of employment floorspace can be found in and around Dover town and Sandwich. Elsewhere, smaller clusters of employment floorspace are located in and around the settlements of Deal, Aylesham and Eythorne, as well as within the more rural areas of the District. However many of the existing industrial estates do not provide high quality modern employment space.

**7.9** Dover has a weak office market, and is constrained by the lack of availability of high quality office space. Dover town and Discovery Park in Sandwich represent the only recognised office centres or notable concentrations of office stock.

**7.10** The viability of new employment development has been a particular challenge in the District over recent years and this remains the case today. This has impacted on the delivery of a number of existing allocated employment sites, and a significant amount of the employment land allocated in the Core Strategy remains undeveloped. Furthermore, some allocated employment sites have now been lost to other uses, or would appear to have very limited prospects of coming forward for employment development. Given this, there is a need to have an employment strategy for the District to prevent the further erosion of existing employment allocations to other non employment uses.

**7.11** Since the contraction of Pfizer in 2011, Discovery Park has evolved into a successful and diversified business location with employment returning to levels similar to those when Pfizer occupied the site. Planning permission has been granted for the re-development of large parts of the site to deliver mixed use development including employment. This presents an opportunity to enhance the commercial offer in the District and provide new jobs and skills. The site provides particular opportunities in the life sciences sectors, with high quality laboratory, office and manufacturing facilities.

**7.12** Dover also benefits from an international port which offers significant potential to deliver job growth and connections to Europe. The Port of Dover is a major infrastructure asset and potential catalyst for growth.

## Tourism

**7.13** The tourism industry is a major contributor to the local economy with 17% of all employment in Dover District either tourism or visitor based, supporting 5,796 jobs. The total value of income derived from tourism in the district is £282 million annually, with the average spend per visitor making an overnight trip worth seven times more to the local economy than that of a day tripper.

**7.14** However, while both the strategic location of the District and its rich natural and historic environments attract many millions of people to Dover each year, only a very small proportion choose to stay in the District (In 2017 there were 4,592,000 visitors, of which only 422,000 were staying visitors). This is a situation which the Council is working hard to improve through the new Visitor and Tourism Strategy 'Destination White Cliffs Country: growth strategy for tourism and the visitor economy 2020 to 2030'.

## Future Economic Strategy

**7.15** The Economic Development Needs Assessment (2017) identifies a limited need for employment land, in quantitative terms, to accommodate employment growth in Dover District. The Strategic Housing Market Assessment (2017) also concludes that the baseline economic scenario is not constrained by labour supply (i.e. there is sufficient labour), so when the population increases, the increase in labour supply is much greater than the demand for jobs – causing increase in out-commuting, decrease in economic activity rates, increase in unemployment. Meaning a cautious approach is needed to the housing target unless significant economic interventions are secured (i.e. regeneration and other economic interventions).

**7.16** Planning to purely meet the quantitative level of need identified would however not be a positive economic strategy, and would not deliver the Council's aspirations to achieve a step change in economic growth within the District. Given this, a new approach is required.

**7.17** Furthermore, opportunity exists to capitalise on the strengths of the Districts Town Centres in relation to their location, accessibility, heritage and tourism offer, to diversify uses within these areas and create vibrant hubs for retail, leisure, culture and employment.

**7.18** The council's new economic growth strategy will also need to respond to the economic impacts associated with Brexit and the coronavirus pandemic, in relation to businesses, town centres and working practices in general, to ensure that the local economy can respond positively to challenges and harness any opportunities going forward. Here, it will be vital that the Plan takes a positive and flexible approach to future economic growth, as a lot is dependant upon market delivery and economic conditions, whilst also recognising there may also be the need for Council intervention in areas of market failure.

**7.19** The governments recent changes to the use class order, whereby B1 has been combined into Class E (commercial, business and service) will also have implications for the Council's economic growth strategy and may have unintended consequences that will have to be addressed in the future.

## How could these be addressed through planning policy and what is our preferred approach?

**7.20** Policy options include:

### Planning for Economic Growth

**7.21** The Economic Development Needs Assessment 2017 identifies the potential level of economic growth that should be provided for in the District to 2037. Following the recommendations of the EDNA, a draft Economic Strategy has been developed which aims to promote a stronger economic narrative and plan, and make the case for further investment and funding to unlock key sites and guide future development in the District.

**7.22** From the EDNA 2017 and the draft Dover Economic Strategy we have identified the following options for levels of economic growth to be planned for:

- Baseline economic growth. This is based upon forecast job growth using Experian's Regional Planning Service, which considers regional and national macro-economic trends to estimate future economic growth. This estimates a total job growth of 2,700 between 2017 and 2037. The job growth estimates are then translated into requirements for land for employment development. Over the 20 year period this shows a negative requirement in new floorspace for employment development of -1,680sqm, with a net increase in requirement of 620 sqm between 2016-2026, and a net reduction in floorspace of -2,300

between 2026 and 2027. If this option were to be chosen, this would likely result in the potential de-allocation of existing allocated employment sites, and no net increase in overall land would be required; or

- Higher economic growth based upon specific planned projects. The EDNA (2017) considered a higher economic growth scenario, whereby the job potential of specific Dover development projects was estimated. These included the following sites, St James's Development (complete), White Cliffs Business Park, Whitfield, Dover Waterfront, Discovery Park and Albert Road Business Park, Deal. The EDNA states that this a purely theoretical assessment that does not take account of potential market demand. It is presented as a yard stick to compare the other growth scenarios against. This would require continuation of the currently adopted policies on the above mentioned sites and result in an estimated job growth of 7,200 jobs to 2037.
- Higher economic growth based upon the draft Economic Strategy. The draft economic strategy is based around five key themes: creating economic value; delivering critical infrastructure for business needs; revitalising our town centres; growing the visitor economy; and supporting the rural economy. An assessment of the likely job growth resulting from this strategy would need to be established through revised job forecasts in an update to the EDNA. This would be carried out following the regulation 18 consultation.

**7.23** The option of planning to meet baseline economic growth would not deliver the level of economic growth in the District that is needed to provide a more prosperous economy, reduce inequality, levels of deprivation and provide the regeneration the District needs. A higher level of economic growth is required in order to achieve the strategic objectives of the Plan. The higher economic growth option based upon the delivery of specific projects set out in the EDNA, is not considered to be a deliverable option, as it was purely theoretical at the time and there have been changes in circumstances in relation to the specific projects.

**7.24** The preferred option is to base a higher economic growth scenario upon the draft Economic Strategy. It is considered that this would provide an aspirational but realistic level of economic growth, based upon an analysis of the key strengths and opportunities in the District. This is considered to represent the most appropriate method for setting out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Delivering the Levels of Economic Growth

**7.25** The following policy options have been considered in supporting the economic growth of the District and delivering the higher levels of economic growth set out above.

### New and Existing Employment Land and Premises

- Identify strategic and non-strategic site allocations for employment growth to meet the needs identified.
- Criteria based policy supporting new employment development that comes forward outside of allocated sites to identify locations where new employment development would be considered acceptable in principle, subject to detailed criteria. Options have been considered in relation to where appropriate locations would be, for example should this be within existing settlements or also allowed in principle on the edge of existing settlements.
- Protection of existing employment sites. This could include a blanket protection of all existing employment premises, or alternatively protect only a list of identified sites which are considered to play a strategic role in the economy of the District, where their loss would be harmful.

**7.26** In the context of the economic growth objectives for the council, the preferred policy approach is to allocate and protect employment sites which provide an important contribution to the overall employment floorspace provision within the district and to also allocate land at employment sites which are able to provide future additional employment growth. This will ensure that a supply of employment land for existing and future growth can be allowed for within the plan period.

### Site specific options

**7.27** The Economic Strategy of the Plan supports the delivery of a higher level of economic growth in the District. However until the Economic Development Needs Assessment has been updated, post Regulation 18, there is uncertainty around the level of jobs growth anticipated over the Plan period and the amount of new employment land that will be required to deliver this.

**7.28** Furthermore, there is uncertainty around the future availability of White Cliffs Business Park for general employment purposes. It is unclear at this stage exactly what will remain available for employment purposes, but it is likely that at least in medium term and potentially long term, only a small part of the site will remain available for employment use.

**7.29** The Council is also aware that growth of employment related to Discovery park may not be able to be accommodated within the existing site and further land may be required to support this growth.

**7.30** Given this, whilst there is still some remaining development potential on existing allocations, which can be rolled forward into the new draft Local Plan, options for allocating further land for employment development are currently limited and further land is therefore likely to be required to deliver the Council's Economic Strategy. The Council is therefore carrying out a call for employment sites as part of the Regulation 18 consultation on the Local Plan.

## Tourism and the Visitor Economy

- Allocate specific sites or promote tourism uses and holiday accommodation in specific locations.
- Criteria based policy supporting new tourism facilities and accommodation.

The preferred policy approach is to provide a more flexible criteria based policy which supports the provision of new tourism facilities in suitable locations in order to support the overarching Tourism Strategy for the council.

## Homeworking

- Requiring live/work units to be provided within allocated sites and/or new residential development ensuring a dedicated workspace is provided within new residential properties to enable home-working to be accommodated comfortably.
- Reliance only on the national space standards.
- Supporting opportunities for home working within existing residential properties, subject to criteria.

The increasing requirement for homeworking space and the need to incorporate this into new build development and existing dwellings is needed, rather than just a reliance on the national space standards. A policy to incorporate this into new build and for applying criteria for home working within existing residential properties will be able to tackle the issue.

## Rural Economy

- Supporting development of the rural economy, through policies which support the conversion of existing rural buildings, and support development within or adjoining the existing rural settlements.
- Considering whether new employment development should be supported or restricted in countryside locations.



The preferred policy approach in order to support a rural economy and allow for rural economic development of an appropriate scale, is for the inclusion of specific policies for conversions of rural buildings and a criteria based policy for rural sites to allow for a more bespoke approach to rural development.

## Draft policies and supporting text

**7.31** Our preferred policy approach to employment and the local economy in the District over the Plan period, and the justification for this, is set out below:

### Economic Growth Strategy

**7.32** Government guidance requires local authorities to plan proactively to meet the needs of business and support a successful local economy. In order to deliver a step change in economic growth in the District the Council has produced an Economic Development Strategy, which establishes the Council's aspirations and vision for economic growth both in overall terms, and through specific opportunities that exist in the District.

**7.33** The strategy identifies the following key themes and objectives, which inform proposals set out in this Local Plan.

- 1 Creating economic value:
  - i To develop an attractive, broad based economic identity for the District, capitalising on its economic advantages and its connections to London and international gateways.
  - ii By 2040 the District will be positioned as a highly desirable and attractive location to do business and for inward investment.
  - iii By 2040 the District will be the first choice of location for industries in relation to life sciences, pharmaceuticals, manufacturing and logistics.
  - iv Dover will be a key business destination in Kent with first class facilities for start ups, enterprise growth and innovation.
- 2 Delivering infrastructure for business needs
  - i By 2040, Dover will have a portfolio of employment space to meet modern business needs, including development sites able to accommodate growth and inward investment opportunities.
  - ii Increase investment in skills and training to promote the District's human capital, helping to retain young people and increase opportunities for all communities.
  - iii All of Dover's businesses and residents will be able to benefit from the advantages of easy, quick and reliable digital connections through new investment in infrastructure.
- 3 Revitalising our town centres
  - i All of the District's town centres will offer a more diverse retail and leisure offer, excellent public realm, high quality town centre living and a thriving evening economy.
  - ii Dover Town Centre will develop a new role as a hub for start up and scale up enterprises through the provision of new workspace concepts.
  - iii The town centres will play a key role as part of White Cliffs Country in being hubs for an expanded visitor economy and cultural offer that can support richer experiences for residents and visitors alike.
- 4 Growing the visitor economy
  - i Encourage investment in the tourism industry.
  - ii Attract new providers and increase the number of visitors coming to the district.

- iii Encourage visitors to invest their time, stay longer and to spend more when they are here.
  - iv Encourage residents and visitors to help us spread the word about the District's range of visitor experiences.
- 5 Supporting the rural economy
- i Support opportunities across Dover's rural area and villages to promote diversification, sustainable development and economic growth.
  - ii Promote the role of key sectors and employment sites within the rural economy, and the development of new workspace hubs to complement housing growth across the network of settlements.
  - iii Secure investment to ensure the rural area has access to good quality, resilient infrastructure that facilitates sustainable travel choices and promotes the green economy.

**7.34** This provides the opportunity to promote a stronger economic narrative and Plan, and make the case for further investment and funding to unlock key sites and guide future development in the District, particularly in the absence of a strong 'quantitative case'.

**7.35** Other issues beyond employment are also relevant within the context of developing a new Local Plan that facilitates economic growth in Dover, for example wider 'place making' priorities; creating attractive places to live and work through revitalising the existing built environment and creating new spaces; town centre regeneration; and infrastructure provision. These issues are covered in other sections of the Plan, but should be considered as part of this strategy.

**7.36** As stated above, until the Economic Development Needs Assessment is updated, it is not possible to set out a specific jobs target or the amount of land that is to be allocated. This evidence will be updated to inform the Regulation 19 version of the Plan. This policy will set out a target for future job growth in the District, and identify the amount and type of land that is to be allocated within the Local Plan in order to support the delivery of the economic strategy.

## Strategic Policy 8: Economic Growth

**The Council will support proposals which deliver economic prosperity, jobs growth, tourism and inward investment and contribute to the delivery of economic growth in the District.**

**A higher level of jobs growth will be planned for, and land will be allocated to fully meet the needs that are identified.**

### Strategic Employment Allocations

**7.37** The National Planning Policy Framework (NPPF) requires that local planning authorities set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable growth, identify strategic sites to meet anticipated needs over the plan period, support existing business sectors and plan for new and emerging sectors. It also requires flexibility and states that the long term protection of sites with little chance of being used for employment purposes should be avoided.

**7.38** A key delivery mechanism for economic growth within the district is through strategic site allocations and the ability to maximise employment opportunities and potential within the prime sites, where there is existing or future land suitable for employment development. An Employment Land Review of the existing employment sites within the district has been carried out in order to take stock of the types and amount of employment sites within the district. The full extent of the land available within the plan period is not yet finalised and further work is required to determine this in conjunction with the economic needs and growth for the district.

**7.39** A further call for sites in order to identify additional employment land at the Regulation 18 consultation is being carried out to ensure sufficient land is available within the plan period to meet the economic growth aspirations.

**7.40** The following sites are currently proposed to be allocated for employment development:

**7.41 Whitecliffs Business Park** - Located at Whitfield with excellent transport links to the A2, this site has been carried forward as a previous allocation. The site will have links to Dover Town centre through the Bus Rapid Transit (BRT) project, creating improved links and connections. Retail development has started to erode the longer term employment potential of parts of the site. Phase I is largely complete and Phase II has outline planning consent and there are potential commitments for Phase III which have not yet reached the planning stages. It is unclear how much of this site will be available for additional employment purposes.

**7.42 Aylesham Development Area** - This site is situated to the south of the Aylesham Conference and Training Centre to the south east of the existing settlement. The site is situated within good proximity to the local centre and community facilities. The site is constrained in terms of access and is situated away from existing industrial uses within Aylesham. There is the potential for this site to come forward in conjunction with additional homes in Aylesham to create sustainable employment opportunities.

**7.43 Sandwich Industrial Estate** - Located to the northeast of Sandwich Town, the site has good access to the strategic road network, but there are site constraints with the industrial estate situated within the flood risk zone and in close proximity to the area of ecological interest. There is potential for further development of employment uses at the site. Improved connectivity with Sandwich would make the site more accessible.

**7.44 Discovery Park** - Discovery Park Enterprise Zone, formerly Pfizer's Research and Development facility, at Sandwich has an established employment function. The site benefits from good access to the strategic road network and Manston Airport. It is the largest employment site in the District and comprises around 280,000sqm of high quality research and development buildings, offices and ancillary facilities set within a landscaped campus. The site has been an Enterprise Zone since 2011 following the Local Development Order (LDO) which removes the need to make planning applications for some types of development on the site in order to encourage start up businesses and investors. It provides a clear framework for business development making it easier to achieve economic growth. It is likely that additional land will be required within the plan period to accommodate further expansion outside of the existing site boundary.

**7.45 Ramsgate Road, Sandwich** - A sprawling industrial area which borders the A256 and the River Stour extending from the Former Richborough Power Site to the north of Discovery Park. The existing employment uses along this area benefit from good access to the strategic road network and Manston Airport. There are a number of site constraints on parts of this area to include flood risk and the adjacent sensitive ecological protection area, but it is considered there is the potential for further intensification of uses to capitalise on the location and accessibility. The site could be better connected with Discovery Park and there is scope for an intensification of employment uses in order to fully utilise the land available and improve the overall quality of the employment opportunities on offer at the site.

**7.46 Dover Waterfront** - Dover Waterfront is centred on Wellington Dock in Dover's Western Docks. The Docks are owned by Dover Harbour Board and are currently subject to a multi million pound regeneration project (Dover Western Docks Revival Project) to transform the seafront and deliver a new marina, cruise ship terminal, cargo terminal and distribution centre. Work on this project is on-going.

**7.47** Dover Waterfront occupies a key location in Dover and covers an area of approximately 11 hectares. The site consists of Wellington Dock, the former De Bradelei Wharf shopping centre, the seafront including existing buildings which are listed and within a conservation area, the Camden Crescent car park and public garden, the promenade and beach. The majority of the site is owned by Dover Harbour Board, apart from the Camden Crescent car park area, which is in the Council's ownership.

**7.48** The site is separated from the Town Centre by the A20, which acts as a major barrier to movement between these two areas. A key element of the strategy for Dover Town is therefore to improve the connectivity of the town centre with the seafront and this will be facilitated through a variety of projects, including the development of Dover Waterfront.

**7.49** The site's location offers a unique opportunity to create a mixed waterfront development at Dover of sufficient scale, quality and substance to become a major attraction and modern day symbol for Dover. This will help to generate jobs and capture visitor expenditure, thereby increasing the centre's overall market share. Creating a complementary offer between the town centre and Waterfront area will further enhance visitation, footfall and linkages between the two locations, subject to the provision of attractive, convenient and safe pedestrian routes. It also provides the Council with a focus to help reposition and proactively promote the town centre and direct the flow of visitors from Kent and especially the Port area.

**7.50** The following policy identifies Dover's employment allocations, where new employment generating development of employment uses will be promoted and supported. These sites are shown on the policies map.

## Strategic Policy 9 Employment Allocations

The following sites are allocated for business and employment purposes:

- Whitecliffs Business Park, Whitfield
- Aylesham Development Area, Aylesham
- Sandwich Industrial Estate, Sandwich\*
- Discovery Park, Sandwich
- Ramsgate Road, Sandwich
- Dover Waterfront\*

In order to achieve the economic growth aspirations for the district, uses will be restricted at the allocated employment sites to employment uses (Use Classes E - Office, B2 and B8), and not including main town centre uses as defined in the National Planning Policy framework.

\*These are flexible employment sites, where wider employment generating uses will be allowed in addition to Classes E - Office, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposals for main town centre uses should also comply with the sequential test policy where necessary.

## New Employment Development

**7.51** Delivering new employment development requires a combination of both the identification of specific allocated sites, as well as a criteria based policy. We would expect new employment development to be concentrated within existing employment areas, to include existing industrial estates and the town centres, and on allocated employment sites. By supporting the development of existing employment sites, we can enable businesses to adapt to changing conditions and retain local job opportunities. New employment development opportunities may come forward outside of the existing or allocated employment sites.

Proposals would need to be situated in locations which provide suitable access to the local road network, and which can also be accessed by a range of means of transport, create additional employment and would not have any other adverse impacts.

**7.52** We want to enable businesses to be able to adapt to market changes and encourage creativity and diversity across all sectors. We also expect new development to adhere to our climate change agenda.

**7.53** New employment development should be provided at a scale that is appropriate to the existing settlement, without detriment to its amenity, character or setting.

**7.54** We want to continue to improve the prosperity of the rural economy within the District. The NPPF indicates that Plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas. It is desirable to enable jobs to be provided locally to cater for the needs of residents in the rural areas and to avoid unsustainable patterns of commuting.

**7.55** There are a number of industrial parks in rural locations and we will look to protect employment land, whilst allowing for changing business needs.

**7.56** Proposals for extensions to existing employment premises in the countryside will particularly need to demonstrate that they would not have a detrimental impact on the character of the landscape.

**7.57** It is important that the rural road network that supports any new development is suitable for the scale and type of vehicle movements associated with new employment proposals. Proposals will be considered within the following policy parameters.

## DM Policy 18 New Employment Development

Provision of new employment premises, and the redevelopment, extension, enhancement and reconfiguration of existing employment premises will be permitted on existing employment sites, employment allocations set out in Strategic Policy 9, and areas within or immediately adjoining the settlement boundaries of designated settlements identified in Strategic Policy 3 (residential windfall development), provided that:

- i It is compatible with the layout, density, fabric and appearance of the existing settlement and surrounding area;
- ii The level and type of activity the proposal generates and the functional and visual relationship it has with adjoining uses would not result in harm to the character and appearance of the surrounding area;
- iii It would not result in harm to or the loss of important green spaces within the confines that contribute positively to the existing character of that settlement;
- iv It would not result in significant harm to heritage assets, landscape character or biodiversity;
- v It would not have a significant adverse impact on the living conditions of existing adjoining residents;
- vi Appropriate provision can be made for parking and access;
- vii It is demonstrated that traffic generated from the development can be safely accommodated on the local road network, and the development will not generate a type or amount of traffic that would be inappropriate to the rural road network.

## Loss or redevelopment of employment sites and premises

**7.58** We need to protect the most sustainable employment sites in order to ensure sufficient land is retained to meet our employment needs and allow for future change and growth of existing businesses.

**7.59** The sites to be retained have been identified through an Employment Land Review of all the suitable employment sites within the district. Uses falling within Use Classes E - Office, B2 and B8 will be supported at these sites where they will not be significantly harmful to the living conditions of neighbouring occupiers of land or buildings. Some of the sites to be retained have been identified as flexible employment sites, where wider employment generating uses will be allowed in addition to class E - office, B2 and B8 uses. Development must still be compatible with neighbouring uses. Proposals for main town centre uses should also comply with the sequential test policy where necessary. Flexible uses include leisure, tourism and other town centre uses which, due to scale and format cannot be accommodated within town centres. They also include sui generis uses which do not fall into a category in the Use Classes Order.

**7.60** It is desirable to enable jobs to be provided locally to cater for the needs of residents in the rural areas and to avoid unsustainable patterns of commuting. Proposals for the loss of existing employment sites as identified in the list of employment sites to be retained or adjoining the more sustainable rural settlements will not be supported.

**7.61** When considering an application for the loss of an employment site, an assessment will need to be made as to the viability of the existing use or an alternative employment use. In order to demonstrate that a site is no longer viable for an employment use, the applicant must provide robust evidence that the premises have been marketed unsuccessfully for both the existing use and any alternative suitable employment use for a period of at least 12 months on terms that should compare with other similar premises and locations being sold or let for employment purposes. The extent of any marketing carried out and the prevailing market conditions will also be material considerations in the Council's assessment of viability evidence. Marketing should also extend to the potential use for other suitable employment generating uses for which the particular location and premises may be suitable.

## DM Policy 19 - Retention of Existing Employment Sites

The following sites will be retained as employment sites and the Council will support uses falling within Use Classes B2 and B8 and use class E - office, where they would not harm the living conditions of neighbouring occupiers of land or buildings:

- Ramsgate Road, Sandwich
- Discovery Park Enterprise Zone, Sandwich
- Sandwich Road Industrial Estate\*
- Pike Road Industrial Estate, Eythorne
- White Cliffs Business Park, Whitfield
- Barwick Road Industrial Estate, Dover
- Deal Business Park
- The Worth Centre, Worth
- A20 Sites
- Aylesham Industrial Estate
- Port Zone\*

\*These are flexible employment sites, where wider employment generating uses will be allowed in addition Classes E - Office, B2 and B8 uses. Development must be compatible with neighbouring uses. Proposals for main town centre uses should also comply with the sequential test policy where necessary.

## DM Policy 20 - Loss or redevelopment of employment sites and premises

Proposals for alternative uses on the employment sites to be retained, and other buildings and land currently used for employment within the district will only be permitted where:

- i It has been demonstrated that the site is no longer suitable or viable for employment purposes following an active and exhaustive marketing process for a minimum of 12 months;
- ii The proposal would not undermine economic growth and employment opportunities in the area;
- iii The proposal would not result in a significant, or harmful reduction in the supply of land available for employment purposes for the remainder of the plan period, having regard to the type of employment land proposed for reuse and its location;
- iv The proposal would not prejudice the ongoing operation of remaining businesses nearby;
- v The proposal would result in a good standard of amenity for existing and future occupants.

### Home Working

**7.62** The level of home working is increasingly taking place for small businesses and individuals and the Council supports home working proposals. As well as allowing more flexibility for the work force and businesses within the district, there are also benefits for the co-location of home and work with reduced car use, which can help to contribute to our climate change agenda.

**7.63** Flexible office space (workhubs) with professional equipment and meeting space that can be hired and used in an ad hoc manner by home based workers can also support home working. It is considered that these facilities can be accommodated on identified business parks or in the town centres.

**7.64** Some small scale home working may not require planning permission. However, where home-working does require planning permission, consideration should be given to the impacts upon the neighbourhood, including for example traffic, noise and disturbance and any impact on character and appearance issues which may be applicable.

## **DM Policy 21 - Home Working**

**Proposals for the establishment of a business operating from a residential property will be permitted, provided that it can be demonstrated that the proposed use would not result in:**

- i Detrimental impacts on residential amenity by reason of dust, noise, light, smell, fumes or other emissions;**
- ii Additional traffic flows or vehicle parking in the vicinity, at a level that would be harmful to residential amenity or highway safety; or**
- iii The erosion of the residential character of the area.**

## **The Rural Economy**

**7.65** The Council wishes to support a sustainable rural economy and rural economic development of an appropriate scale. Sustainable rural tourism and leisure developments that benefit businesses in the rural area and promote the retention and development of local services and community facilities will be supported.

**7.66** There is demand for rural employment space in the Dover District (EDNA, 2017) with continued growth of this type of premises considered inevitable to meet the needs of the local rural business market. These premises can also play an important role in providing affordable workspace and retaining home based businesses within the local community.

**7.67** The NPPF supports the conversion of rural buildings to support sustainable growth and expansion of all types of business and enterprise in rural areas. Some agricultural and other rural buildings may no longer be suitable for their original purpose and their reuse can provide a useful and viable means of enabling the local rural economy to evolve and diversify without requiring new buildings to be developed in sensitive rural locations.

**7.68** Conversions of rural buildings might be particularly desirable where buildings are listed, or have other landscape value, and their long-term retention may be sought for these reasons.

**7.69** It is acknowledged that through permitted development rights, in some cases the change of use of agricultural buildings does not require planning permission. Where planning consent is required the following policy will apply:



## DM Policy 22 - Conversion or Rebuild of Rural Buildings for Economic Development Purposes

Proposals to convert or, where not capable of conversion, rebuild rural buildings, for employment, non-residential tourism, leisure or community-related uses will be supported subject to meeting all of the following criteria:

- i The building is of the same form, bulk and general design,
- ii The building is to be converted or rebuilt in a way that preserves the rural character of the area,
- iii It can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it and,
- iv The scale and nature of the proposed use would not result in any significant adverse impacts on the character of any settlement or buildings, the surrounding landscape, its biodiversity value or the amenities of local residents.

**7.70** New employment premises in the countryside will not be permitted unless exceptional circumstances can be demonstrated to set aside the normal presumption against such developments. Such circumstances may include the functional need for a countryside location, such as the processing of local agricultural products. New employment sites in the countryside will need to have regard to the need to protect countryside sites with specific landscape, biodiversity or historic qualities.

**7.71** Development should have regard to the Kent Downs AONB Farmstead Guidance produced by English Heritage (now known as Historic England), Kent Downs AONB, KCC and Kent Design.

## DM Policy 23 - New Employment Premises in the Countryside

Proposals for employment development in the countryside, which are not specifically allocated for development in this Plan and where DM Policies 18 (New Employment Development) and 22 (Conversion or Re-build of Rural Buildings) do not apply, will not be supported unless all of the following criteria can be met:-

- i It is essential for the proposal to be located in the countryside;
- ii Development can be integrated sensitively into its context respecting the character of any important existing buildings, the landscape setting and sites of biodiversity value;
- iii There would be no significant impact on the amenities of any neighbouring residential occupiers; and,
- iv It can be demonstrated that the development will not generate a type or amount of traffic that would be inappropriate to the rural road network that serves it.

## Sustainable Tourism and Tourist/Visitor Accommodation

**7.72** The visitor economy, visitor experiences and tourism are increasingly important catalysts for social, economic and physical regeneration. The Tourism Strategy (*'Destination White Cliffs Country – A Growth Strategy for Tourism and the Visitor Economy 2020 to 2030'* due to be adopted in 2020) aims to encourage investment in the tourism industry, attract new providers and increase the number of staying visitors year on year and to increase visitor spend per trip.

**7.73** Both the strategic location and the District's rich natural and historic environments attract many millions of people to Dover each year, and we want to increase the number of over night staying visitors within the district, which has been disproportionately low and capitalise on our excellent location internationally important connections to and from Europe.

**7.74** Improvements to infrastructure and the facilitation of new hotels, particularly 4\* or 5\* rated, restaurants and attractions, as well as business and marketing centres, will help to enable and achieve the aspirations for the tourism sector within the Dover District. The tourism industry is a major contributor to the local economy and a proactive approach to encourage the expansion of our existing tourism offer within the district will continue to grow the tourism sector, further boosting the economy and creating more jobs.

**7.75** White Cliffs Country has over 100 recognised visitor attractions, which are currently history and heritage focused, supported by leisure and activity, as well as culture. By allowing these existing attractions to fulfil their full capabilities and encouraging new and creative tourism opportunities, we can further increase the tourism contribution to the local economy.

**7.76** A broad range of accommodation, both serviced and self catering must be available to meet the tourism requirements in sustainable locations. The aim is to create sustainable tourism which offers a choice of transport options for visitors and employees. Visitor accommodation in the District has been heavily dominated by the self-catering market, we want to enable more serviced hotels and Bed and Breakfast accommodation as well as continuing to expand and diversify the self catering market.

## DM Policy 24 - Tourism and Tourist/Visitor Accommodation

Proposals will be supported which deliver a high quality, sustainable tourism experience for visitors to the district, and ensure proposals benefit the local community and businesses.

Proposals will be supported where they contribute to at least one or more of the following criteria:

- Enhance and improve the quality and diversity of visitor experiences
- Increase the number of visitors, the length of stay of overnight visitors and the range of high quality accommodation available
- Encourage a year round sustainable tourism industry
- Increase the number of jobs, opportunities for training, skills development and apprenticeships within the Visitor Economy.

### Tourism Proposals

Tourism proposals will be supported where they:

- Are located within or adjacent to an existing visitor attraction or accommodation site; or
- Rely upon a geographically fixed resource which justifies the development; or
- Are within or well related to an existing settlement

Tourism proposals must be at an appropriate scale that does not detrimentally impact on the surrounding area, including impact upon the road network and will be accessed by a range of means of transport.

## Serviced Tourist/Visitor Accommodation

We will seek to retain and evolve a broad range of high quality serviced tourist accommodation. New serviced tourist/visitor accommodation will be supported, including extensions and improvements to existing accommodation, where proposals are well related to existing built development and can satisfy the following criteria.

Proposals will be supported where they:

- Are at an appropriate scale that does not detrimentally impact the surrounding area, including the impact upon the road network.
- Are in a sustainable location and accessible by a range of means of transport, including walking and cycling.
- Respect landscape character and nature conservation value.
- Provide appropriate mitigation to deal with any increase in recreational pressure on designated nature conservation sites.

Proposals for conference and exhibition facilities in the Town Centres, potentially in association with hotel development, will be supported subject to other Local Plan policies.

Proposals that would result in the loss of existing high quality tourist/visitor accommodation with 10 or more bedrooms will not be supported unless it can be demonstrated that the hotel/guesthouse or self catering accommodation is no longer viable for such use.

## Self Catering Tourist Accommodation – Caravans and Camping

We will seek to retain and evolve a broad range of self catering accommodation to suit a variety of budgets. Proposals for the development, diversification, upgrade or improvement of self-catering tourist/visitor accommodation (including caravans, camping, glamping, lodges, huts, tree house accommodation, and pods) will be supported subject to the following criteria.

Proposals will be supported where they:

- Are of appropriate siting, design, scale and access
- Are related well to the primary and secondary road network
- Are consistent with the landscape character and capable of being extensively landscaped, with screening and landscape recovery incorporated

We will only permit the loss of tented or touring caravan uses to other forms of caravan and camping accommodation where:

- There is a good range of caravan and camping accommodation maintained in the local area
- The proposal would broaden the range and offer of accommodation available through the provision of new types of accommodation.



# Retail and town centres

**8.1** This section sets out the Council's strategy for retail and town centres and covers:

- What the key issues are in relation to the retail and town centres in the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Quantity and location of retail development;
  - Dover town centre;
  - Deal and Sandwich town centres;
  - Primary Shopping Areas;
  - Sequential Test and Impact Assessment;
  - Local Centres; and
  - Shop fronts.

### What are the key issues to consider?

**8.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in relation to retail and town centres:

**8.3** The NPPF (2019) states that Local Plans should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Furthermore, the NPPF (2019) continues that planning policies should define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters.

### Existing Retail Context

**8.4** The District faces competition from other areas in Kent, such as Canterbury, Westwood Cross in Thanet and Bluewater in respect to retailing and leisure, and there is a need to recognise the function and role that the District's town centres play in the retail hierarchy, and identify ways of diversifying the uses in these locations to create more sustainable centres.

**8.5** Convenience and food stores serving the District are achieving an overall market share of 69.5% (with SFT), which represents a good retention rate reflecting the strength and quality of the overall food shopping offer. In contrast, the comparison goods market share (with SFT) for the main centres and stores in the District is lower achieving an overall 29.2%. A key issue is therefore to increase retention and clawback expenditure to the town centres.

**8.6** The total available expenditure for food and drink in the Council area is set to increase by £47.3m (37.7%) over the period to 2037. There is no identified capacity in the short term after accounting for the A3/A4 floorspace proposed as part of the St. James scheme. The growth in expenditure results in the potential floorspace capacity in the long term of between 2,191 sqm gross and 5,438 sqm gross by 2037. The prospect for new facilities is however ultimately determined by the level of market demand and interest and should be directed to town centres to enhance the complementarity they bring.

### Dover Town Centre

**8.7** Dover town centre is a historic centre with strong maritime and military heritage.

**8.8** It is highly accessible by train, car, bus and ferry and has a good level of parking provision. However the A20 to the south of the town centre acts as a major barrier, is often congested with lorries using the port, creates a poor quality environment, contributes to poor air quality in this area and dissects the town

from the sea front. In addition to this there are also issues with the one way system around the town and east/ west links through the centre, meaning connectivity between the different areas of the town centre is also poor, and the centre is difficult to navigate around.

**8.9** The town centre itself is physically long and sprawling, with no key focus. It has a diverse mix of multiple and independent operators, and a number of key anchor tenants including Marks and Spencer, Next, Boots and WH Smith. However the centre suffers from a high vacancy rate - in 2017 the Town Centre had a vacancy rate of 15.2% which was higher than the national average of 11.2% at that time.

**8.10** Furthermore, there is a lack of critical mass of comparison goods retailers; a lack of food and beverage provision; and a high proportion of charity shops. The town centre also suffers from strong competition from neighbouring centres such as Canterbury; and a poor perception from residents concerning its retail offer.

**8.11** The centre fails to capitalise on its tourist offer and visitors using the Port tend to by-pass the town centre in favour of other retail and tourist destinations in the surrounding area. The new cruise ship terminal at the Western docks has however created greater opportunities to grow the tourism sector in the town and the council have identified the need for mid to high end hotel accommodation to support this market.

**8.12** The opening of the new St James retail development in 2018 provided the focus for the rejuvenation of the town, enhanced the retail and leisure offer, and re-positioned the town centre. There is the need to capitalise on this investment however to secure benefits to the wider town centre area.

**8.13** For the town centre to work there needs to be a mix of uses that are complementary to its functioning. Empty space represents opportunities for other types of development such as residential, offices, bars and restaurants as well as other leisure uses. Hence moving forward, a more flexible strategy is required to create a more vibrant centre.

**8.14** A number of development opportunities exist both within and in close proximity to the Town Centre. However in order to deliver these projects and transform the town centre a co-ordinated strategy is required.

**8.15** To support these initiatives there is also the need to develop a coherent connectivity plan for the town centre to provide clear links between different areas; improve accessibility to the mainline High Speed 1 station; provide opportunities for walking and cycling; create focal points to aid navigation and increase social interaction; enhance access to the many historic and cultural assets in the town centre and beyond; and maximise access to the areas of green and blue infrastructure into the town centre to encourage greater levels of utilisation.

## Deal Town Centre

**8.16** Deal in comparison to Dover is a more compact centre. It is a traditional high street, which runs north to south through the town and forms the centre's heart. The historic pattern of the centre lends itself to a limited scale of development for expansion, but notwithstanding this it is nonetheless well thought of by local residents. Deal also has a good level of accessibility and an attractive town centre environment.

**8.17** Major retailers in the centre include Boots, WHSmith, Mountain Warehouse, Clarks and Superdrug. Additional multiple retailers include Holland and Barratt, Card Factory, M&Co, Savers, and Poundland. The majority of retailers are located along the centre and southern end of the High Street. The centre also thrives from its wide range of independent retailers which contribute significantly to the overall diversity and viability of the town centre's offer.

**8.18** Deal has a low vacancy rate when compared with the national average. The low rate of vacancy is attributable to the compact nature of the town centre and the blend of national and independent retailers that offer a diverse and attractive retail offer to shoppers.

**8.19** The centre would benefit from improved connectivity with the seafront to gain additional tourist trade. The long term strategy for the centre needs to focus on proactively and continuously promoting the centre as a family leisure destination and capitalising on its historic heritage.

## Sandwich Town Centre

**8.20** Sandwich is renowned for its medieval street pattern and high concentration of listed buildings. The town centre serves the daily needs of its local residents and is a key tourist attraction. The centre benefits from its proximity to a renowned international golf course - The Royal St George's Golf Club which is one of the courses on The Open Championship rotation. Sandwich is also relatively well-connected in terms of road and rail links.

**8.21** The retail profile of the centre is dominated by independent traders who contribute to the overall diversity, vitality and viability of the centre visit. In terms of representation by multiples this includes Boots, Costa, and the Co-op. The level of vacancy is considerably below that of the national average. The vacancy level is characteristic of a centre of this type which is constrained by the type and size of space available in a historic setting.

**8.22** As the development potential is limited due to the historic layout of the town centre, the continued vitality and viability of the centre is dependent on active promotion of the centre and on capitalising on the tourism spend associated with the centre's historic medieval heritage and golfing heritage.

## Local and Village Centres

**8.23** The District has a number of local and village centres which serve the day to day needs of local communities. In order to properly serve their convenience function, it is important that local and village centres retain a good range of shops. This has additional sustainability benefits, reducing the need to make avoidable trips (particularly by car) to other centres elsewhere.

## Future Strategy

**8.24** The Retail and Town Centre Needs Assessment (2018) identifies no need for convenience goods and a small need for comparison goods, primarily in Deal and Sandwich, towards the end of the Plan period. However there is considerable uncertainty in retail forecasting beyond ten years. Given this a review of the Retail and Town Centre Needs Assessment will be carried out post Reg 18 consultation on the draft Local Plan.

**8.25** There are also concerns surrounding the increase of vacant retail premises across the District, the long term future of retailing as a sector and rapid changes in the industry on a national scale, particularly in light of COVID-19.

**8.26** The recent changes by the government to the use classes order will also allow far greater flexibility to change uses within town centres without the need to obtain planning permission. The new approach aims to promote the vitality and viability of town centres by allowing more diversification in a way that can respond to rapid changes in the retail and leisure sectors. It remains to be seen however whether this approach has harmful unintended consequences for town centres.

## How could these be addressed through planning policy and what is our preferred approach?

**8.27** Policy options include:

## Quantity and Location of Retail Development

**8.28** The NPPF (2019) states that planning policies should allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary.

**8.29** The Retail and Town Centre Needs Assessment 2018 makes an assessment of overall quantitative capacity for new (convenience and comparison goods) retail floorspace over the period to 2037. It is clear from this study that there is only one option the council should be considering in relation to the amount of retail development required, and the NPPF (2019) states that a town centre first approach should be taken to the location of new retail development, therefore reducing the need to consider any further options in this respect.

**8.30** The council could consider allocating sites for retail development in the District's towns to deliver the retail need identified, however, given the floorspace requirements are for the end of the Plan period, and the level of uncertainty around the projections because of this, it is considered that there isn't sufficient evidence at this time to inform the need for retail allocations. Furthermore, it is considered that this need could be met through existing vacant premises in the primary shopping areas of the District's town centres and through the development opportunities identified in Dover Town Centre, set out in Strategic Policy 11.

### Dover Town Centre

**8.31** The Retail and Town Centre Needs Assessment 2018 identifies a number of opportunities in Dover Town Centre and an overarching strategy is required to deliver this. Options include:

- A policy that only permits main town centre uses within the town centre boundary; or
- A policy that takes a more flexible approach to development in the town centre, which enables the development of other uses (including residential), alongside main town centre uses, within the town centre boundary; or
- Maintain the existing town centre boundary and primary shopping area; or
- Define a new town centre boundary and primary shopping area.

**8.32** Having considered the evidence, opportunities and policy context for Dover, the Council's preferred approach is to adopt a more flexible approach to development in Dover Town Centre, to take a more positive approach to its growth, management and adaptation over the Plan period, in line with the NPPF (2019). This will also involve redrawing the town centre boundary and primary shopping area to make them more functional.

### Deal Town Centre

**8.33** The Retail Town Centre Needs Assessment (2018) recommends two options for Deal Town Centre in terms of increasing the Town Centre Boundary following evidence to demonstrate town centres uses within these areas, which are currently outside of the town centre boundary.

- Option 1 is to include High Street/Oak Street intersection up to the High Street/New Street intersection. The boundary would also encompass St George's Road. This additional area has a diversity of retail and commercial leisure provision, as well as a museum, visitor centre, St George's Church and tourism centre. These constitute town centre uses under the current NPPF (2019). It was also concluded within



a Council audit that 73% of existing units in this area comprise of town centre uses as defined under the NPPF.

- Option 2 would be to carry out the extension to the Town Centre Boundary as per option 1 and also extend the town centre boundary to include Deal Town Hall, The Landmark Centre and Union Road Car park. This will enable linkage with the retail, commercial and leisure provision in Option 1 together with safeguarding enhancing the vitality of the centre by incorporating the car park which at present also provides space for the long running market. These are classed as town centre uses under the NPPF (2019) and a council audit has shown that up to 75% of existing units in this area comprise of town centre uses.

**8.34** Having considered the evidence, opportunities and policy context for Deal and in the light of the changes to planning Use Class E and the NPPF (2019) the Option 2 is the Council's preferred option to enable an increased Town Centre Boundary, to be able to provide a more focused and managed town centre context, which will also be able to provide flexibility to ensure the vitality and viability can be maintained and enhanced to provide the range of uses required to support the local residents and the visitor experience for tourists. This will allow for a level of growth as highlighted in the Retail and Town Centre Needs Assessment (2018) for retail floorspace In Deal within the plan period.

## Sandwich Town Centre

**8.35** The Retail and Town Centre Needs Assessment (2018) predates the Planning Use Class E changes and the NPPF (2019) and only designates a secondary shopping frontage within Sandwich town centre. In terms of the retail hierarchy and importance of Sandwich town centre, it is considered that the designation of a primary shopping area is required in order to provide appropriate policy management and protect the vitality and viability of the town centre. In order to achieve this the options are:

- Designate a primary shopping area within the town centre at Market Street, Cattle Market, King Street and part of New Street. This will create a clearer strategy for any future change of use or development within the centre.
- The alternative is to not designate a primary shopping frontage within Sandwich, but this would mean reliance on the NPPF only for decision making.

**8.36** Having considered the evidence, opportunities and policy context for Sandwich, the Council's preferred approach is to designate a primary shopping area within the town centre highlighted on the policies map, which includes units within Market Street, Cattle Market, King Street, and New Street. This will create a more proactive and flexible guided approach to decision making within the town centre in line with the NPPF (2019). The aim is to ensure the continued vitality and viability of the centre with a range of uses available to meet the needs of the local population and capitalise on the tourism spend associated with the centre's historic and medieval heritage and golfing heritage. The option of not designating a primary shopping area will mean the policy context for Sandwich is not up to date and would not provide sufficient guidance for decision making within the town centre.

## Retail and Town Centres

**8.37** With the changes to the NPPF (Feb 2019) requiring a designated primary shopping area compared with the previous method of designating primary and secondary retail frontages, the policy needs to identify the uses which are considered to be acceptable within the primary shopping areas.

**8.38** Options include:

- A policy which allows only retail uses within the primary shopping area.

- A more flexible policy which allows a wider range of commercial uses subject to specified criteria that ensure the proposals contribute to the overall vitality and viability of town centres.
- To not allow residential uses within the ground floor of the primary shopping areas to protect the retail and commercial uses.

**8.39** Given the changing nature and role of town centres, and the importance of a wider range of uses being provided within town centre, to ensure their future vitality and viability, the flexible approach is considered to be the preferred option. In addition, changes resulting from the new use Class E and potential impacts associated within the COVID-19 pandemic mean a more flexible approach is the most appropriate. The provision of residential uses within town centres is considered important to increase footfall and activity in town centres, however the provision of residential on the ground floor within the primary shopping areas is likely to have a negative effect on the commercial function of the area. The option to restrict residential on the ground floor is therefore considered to be justified.

## The Sequential and Impact Test

**8.40** The NPPF requires that a sequential test is carried out for main town centres uses not within a main centre nor in accordance with an up to date plan. The NPPF also sets out the requirement for an impact assessment for retail proposals greater than 2,500 sqm, or where a local threshold applies.

**8.41** Options include:

- A policy which sets out the NPPF requirements.
- A more localised policy setting out the expected requirements supported by the threshold evidenced in the Retail and Town Centre Needs Assessment (July 2018).

**8.42** A more localised policy is the preferred approach utilising the impact assessment threshold of 350sqm as set out in the evidence base, to ensure that the impact of proposals for retail development outside of town centres can be fully considered and ensure no harmful impact upon the town centres from out of town proposals.

## Local Centres

**8.43** Local Centres perform an important role in the retail hierarchy catering for basket and top up shopping, located in sustainable locations often walkable from residential areas. It is important the such facilities continue to be provided in order to support local communities and to reduce the need to travel (particularly by private car). Options to protect the smaller convenience shops within the district are:

- To have a policy which protects the loss of local convenience shops, by requiring evidence to support the loss of any unit in the form of active marketing for at least 12 months consistent with other similar policies which seek to protect specified uses and ensuring any new convenience stores would be a maximum floorspace of 280sqm consistent with the NPPF (2019).
- No policy to protect the loss of local convenience stores, or limit on the size of convenience stores in the context of the overall retail hierarchy.

**8.44** The preferred option is to have a specific policy which provides clarity and guidance for the loss of convenience stores and the size limits of local stores. Without this, there is risk that local facilities could be lost where there is a need for the facility. The limit on size of new facilities would ensure that the existing retail hierarchy is supported and protected, and that larger facilities are directed to town centres in accordance with national policy.

## Shop Fronts

**8.45** There is a need to create town centres and retail units which are flexible and can adapt to change, but there is also need to protect the overall character and historic environment of our town centres. The majority of the primary shopping areas within Dover, Deal and Sandwich fall within Conservation areas and alterations or development therefore need to be carefully managed.

**8.46** Options include:

- A shopfront policy which guides development in order to ensure alterations continue to positively contribute to the overall character of retail and commercial frontages within the town centres.
- No policy to guide shopfront alterations or development, reliance on NPPF (2019) only for decision making.

**8.47** The preferred policy approach for shopfronts is to have a policy which can guide alterations and development in order to ensure the vitality and viability of town centres can be maintained. The reliance on the NPPF for decision making does not provide sufficient local detail to be considered in decision making.

## Draft policies and supporting text

**8.48** Our preferred policy approach to retail and town centres over the Plan period, and the justification for this, is set out below:

## Quantity and Location of Retail Development

**8.49** The District's town centres, local and village centres provide a focus for activity and community life providing shopping, leisure, employment, culture as well as other services. This is particularly the case for Dover, Deal and Sandwich town centres.

**8.50** The Council is required to set out a network and hierarchy of shopping and service centres in the Local Plan. Identifying the existing hierarchy provides an understanding of the role and function of the District's centres and their interrelationship. A major factor in determining the role of the centres is the catchment which they serve. Canterbury is the pre-dominant centre in the wider sub region of East Kent. Dover's hierarchy of centres broadly accords with the settlement hierarchy (set out in Appendix 1) and is set out below:

**8.51** Secondary Regional Centre - Dover Town Centre is positioned at the top of the retail hierarchy and performs the role of a Secondary Regional Centre as it is materially larger in terms of floorspace than the other centres in the District; and provides town centre functions for the whole district in terms of administrative, retail, leisure, office, education and culture.

**8.52** Town Centre's - Deal and Sandwich Town Centre's provide a complementary role to Dover Town Centre. The catchments of these town centres are predominantly their individual town populations and tourist trade with a wide range of shops to cater for everyday need, special interest and tourism. These towns have traditionally attracted national retailers and services as well as local businesses.

**8.53** District Centre - Aylesham has been identified as a Rural Service Centre in the Settlement Hierarchy since the Dover Local Plan of 2002 and is considered to fit the definition of a District Centre, given its the largest rural settlement by population in the District. It caters for local needs and services, providing shops, including a supermarket, a range of non-retail services and local public facilities e.g. a library. It serves a limited catchment and as a location it is not appropriate for large scale retail development.

**8.54** Local and Village Centres - These cater for a more restricted local need and tend to have a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office, a pharmacy or a launderette. Business is often local rather than the national multiples. These centres are not appropriate for large scale retail development.

**8.55** The retail hierarchy demonstrates an understanding of how the District's centres interact with one another at district and sub-regional levels. It is not designed to favour one centre over another and does not in itself direct investment decisions.

**8.56** With regards to future retail need, the Retail and Town Centre Needs Assessment 2018 concluded:

- Convenience goods – District wide forecast capacity over the plan period to 2037 can be accommodated by existing commitments
- Comparison goods – there is no District wide capacity for new comparison goods floorspace over the short term (to 2022) and the medium term (to 2027). By 2032 there is the capacity for 615sqm net rising to 3,243 sqm net by 2037.

**8.57** When capacity is assessed on a centre-by centre basis the forecasts show no quantitative need for new comparison goods floorspace for Dover (assuming constant market shares) as any residual expenditure growth over the Plan period will be absorbed by the St. James' scheme. Any floorspace capacity over the longer term is forecast for Sandwich and Deal, with a total combined capacity of 1,923 sqm net by 2032, increasing to 2,854 sqm net by 2037.

	2022	2027	2032	2037
Dover Town Centre	-3,592	-2,701	-1,715	-688
Deal and Sandwich Town Centres	222	1,029	1,923	2,854
All other Local and Village Centres	10	46	85	126
All Out-of-Centre Floorspace	-830	-284	321	951
Total District Wide Comparison Goods Capacity	-4,190	-1,910	615	3,243

Table 8.1

**8.58** However, it should be noted that capacity forecasts beyond five years should be treated with caution, as they are based on various layers of assumptions and forecasts with regard to the trading performance of existing centres and stores, the growth in population and retail spending, constant market shares, etc.

## Strategic Policy 10 Quantity and Location of Retail Development

Retail development should be delivered in line with the Table above.<sup>3</sup>

The provision of new retail floorspace should be focused in the main towns of Dover, Deal and Sandwich first, with any further need distributed in accordance with the retail hierarchy set out above.

The provision of town centre uses should reflect the individual role, character and heritage of the town centres, and be in conformity with the other policies in the Plan.

<sup>3</sup> This gives an indication of the quantitative level of retail need and shouldn't be applied rigidly. It should be regarded as a guide rather than a target.

## Dover Town Centre

8.59 The Council's aspiration for Dover Town Centre is to...

- Create a more vibrant centre by encouraging a diverse range of uses in the town centre, to maximise its attractiveness as a place to live, work and socialise;
- Increase the number of visitors to the town centre (both residents and tourists alike) and improve dwell time;
- Improve the synergy between different areas and visitor attractions in the town centre and beyond;
- Enhance the environment in the town centre to make it more welcoming and renew the sense of pride in the town; and
- Improve connectivity both within the town centre boundary, and with other areas such as the sea front to maximise and optimise the way people get to and travel around the town centre.

8.60 The strategy to deliver this aspiration is set out in Strategic Policy 11 and the Dover Town Centre Strategy Plan below.



Figure 8.1

## Dover Town Centre Boundary and Primary Shopping Areas

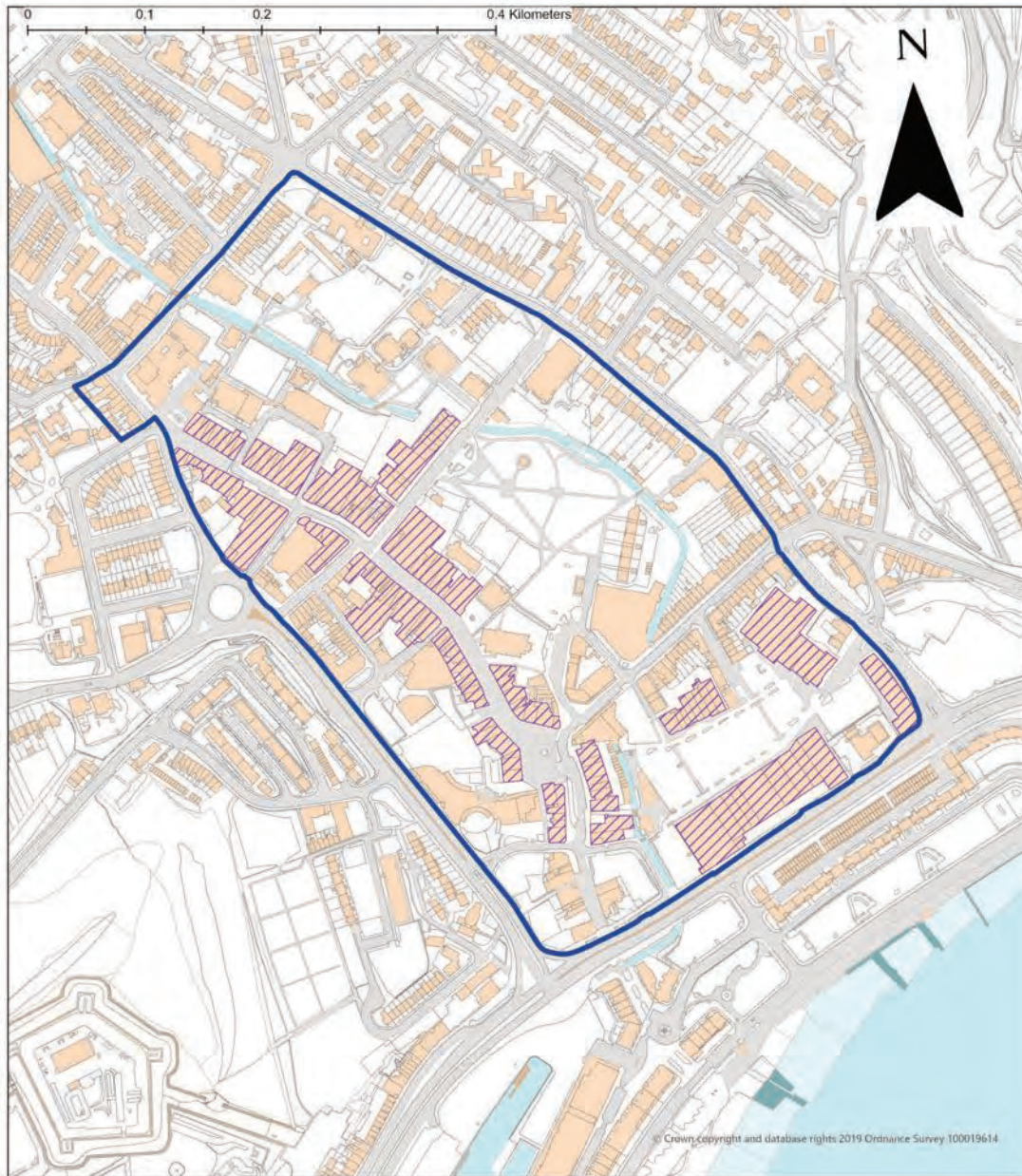


Figure 8.2

**8.61** The strategy that has been developed for the town centre takes into account the findings of the 2017 Retail and Town Centre Needs Assessment, and the Economic Development Strategy (2020) and identifies opportunities for development within the town centre boundary, in addition to setting out general principals to guide development in the town centre area.

**8.62** The focus of the strategy is to create a more vibrant town centre. This will be achieved by:

- Reducing the town centre boundary;
- Protecting the core primary shopping area in the town centre for commercial, business and service uses that fall under use class E of the updated use class order (Sept 2020) and other main town centres uses including: leisure, entertainment facilities, cinemas, restaurants, take-aways, bars and pubs, night clubs, casinos, health and fitness centres, indoor bowling centres, bingo halls, offices, arts, culture and tourism development (including theatres, museums, galleries, concert halls, hotels and conference facilities).
- Taking a more flexible approach to proposals outside the core primary shopping area, and supporting a broad range of uses here, including residential and community (including libraries, public halls, places of worship and law courts) to enhance the long term vitality and viability of the town centre.

**8.63** In addition to this, the strategy identifies a number of sites which present the opportunity for mixed use redevelopment within the town centre that potentially includes residential. These will contribute to the overall vibrancy of the town. These sites include the Bench Street area, the former Co-op Site, Stembrook Car park and the Mid Town area. Further development opportunities have also been identified adjacent to the Town Centre boundary at Dover Waterfront and the former Leisure Centre Site. These sites would be suitable for mixed use development.

**8.64** Opportunities have also been identified at Market Square, along the section of the A20 corridor that runs through the town centre, Pencester Gardens and along the River Dour corridor to deliver public realm improvements, improve connectivity, and enhance the attractiveness of the town centre as a place to live, work and socialise. A key element of the strategy is also to improve the connectivity of the town centre with the seafront and this will be facilitated in part through the development of Dover Waterfront.

**8.65** Dover Town Centre in particular offers opportunities for significant change through the redevelopment of vacant sites and replacement of poorly designed buildings. Developments with innovative layouts which maximise the use of a site and, where appropriate, make use of multiple levels are encouraged, having regard to local context and the historic setting of the town. Proposed schemes that aim to achieve landmark buildings should be of demonstrably outstanding architecture.

**8.66** In order to deliver the strategy for Dover Town Centre a co-ordinated, multi-partner, approach is required. Further design guidance will also be produced to expand upon the policy approach below and provide more detail to guide the regeneration of the town centre.

## Strategic Policy 11: Dover Town Centre

The Council will support proposals, in principle, that help to deliver the regeneration and development of Dover town centre, in accordance with the vision and town centre strategy plan above, and the principals set out below.

### Dover Town Centre Uses

The primary shopping area in the town centre comprises St James St, King St, Cannon St, Biggin St and Pencester Road and this should be the focus for E class uses, in addition to pubs or drinking establishments, food and drink takeaways, and other main town centre uses, in accordance with Policy DM 25 Primary Shopping Areas.



In the wider town centre area (as defined on the town centre strategy plan) a broader range of uses will be supported including commercial, business and service uses (class E), main town centre uses, residential, and community (as set out above) so enhancing its attractiveness as a centre, extending its life into the early evening and providing a broader range of services for local people.

## Opportunity Areas

Opportunity Areas have been identified on the town centre strategy plan at Bench Street; the former Co-Op Site; Stembrook Car park; and Mid Town area. These sites provide the opportunity for mixed use re-development in the town centre area to enhance the retail and leisure offer, support the local economy, promote tourism and provide residential accommodation. Further opportunities for mixed use development have also been identified adjacent to the Town Centre boundary at Dover Waterfront and the former Leisure Centre Site.

The council will also support the expansion of further and higher education facilities at the Kent College campus subject to design and other site specific considerations.

Opportunities to enhance the public realm and improve connectivity in the town centre area have been identified at Market Square; along the section of the A20 corridor that runs through the town centre; Pencester Gardens; and along the River Dour corridor. A key element of the strategy is also to improve the connectivity of the town centre with the seafront and this will be facilitated in part through the development of Dover Waterfront.

## General Principles

New development should make a positive contribution to improving the town centre's viability and vitality, support the creation of a safe, attractive, accessible and high quality environment, improve the overall mix of land uses in the centre and enhance connectivity, both within the centre and to adjoining areas. This will be achieved by:

- i Requiring all schemes to demonstrate a quality of design that makes a significant contribution to the character of the town centre, including any proposed buildings and public realm.
- ii Ensuring the most effective use of land in the town centre, through the promotion of high density development where appropriate, making use of space above shops for residential, and re-using or re-developing existing buildings.
- iii Encouraging the provision of flexible office space, to capitalise on the Town Centres sustainable location and excellent transport links.
- iv Improving access to the town centre, and connectivity between the different areas of the town centre, to create a more legible environment and promote ease of movement.
- v Recognising the rich historical landscape in the town and ensuring that proposals conserve and enhance the setting and character of these important Heritage Assets.
- vi Enhancing the quality of the environment in the town centre; improving public realm; investing in existing and establishing new green infrastructure; and enhancing visitor experience.
- vii Providing opportunities for shopping, community and leisure events to encourage more people to visit the town centre.
- viii Taking a balanced approach to car parking provision, that acknowledges the sustainability of the town centre and its rail and bus connections, informed by a town centre parking strategy.

To support the development and regeneration of the Town Centre further design guidance will be prepared.

## Deal and Sandwich Town Centres

**8.67** The strategy for Deal and Sandwich is to continue to protect the vitality and viability of the town centres for the communities they serve. The primary shopping areas for Deal and Sandwich are both located entirely within Conservation Areas. The context of the historic environment will play an important and defining role on any future proposals to enable an interchange between uses to adapt to market changes within the towns, whilst not compromising on their overall identities as characterful historic towns.

**8.68** For Deal, the town centre will be proactively and continuously promoted as a family leisure destination which capitalises on the historic heritage, with improved connectivity to the seafront from the town to increase the tourist trade.

**8.69** For Sandwich, which has certain limitations because of the historic medieval street pattern and number of listed buildings, the focus will be upon capitalising on the tourism spend within the town centre associated with the town's historic medieval heritage and golfing identity.

## Deal Town Centre Boundary and Primary Shopping Areas

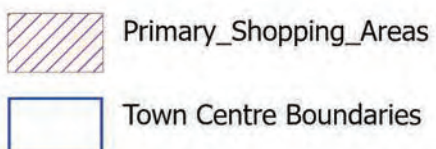
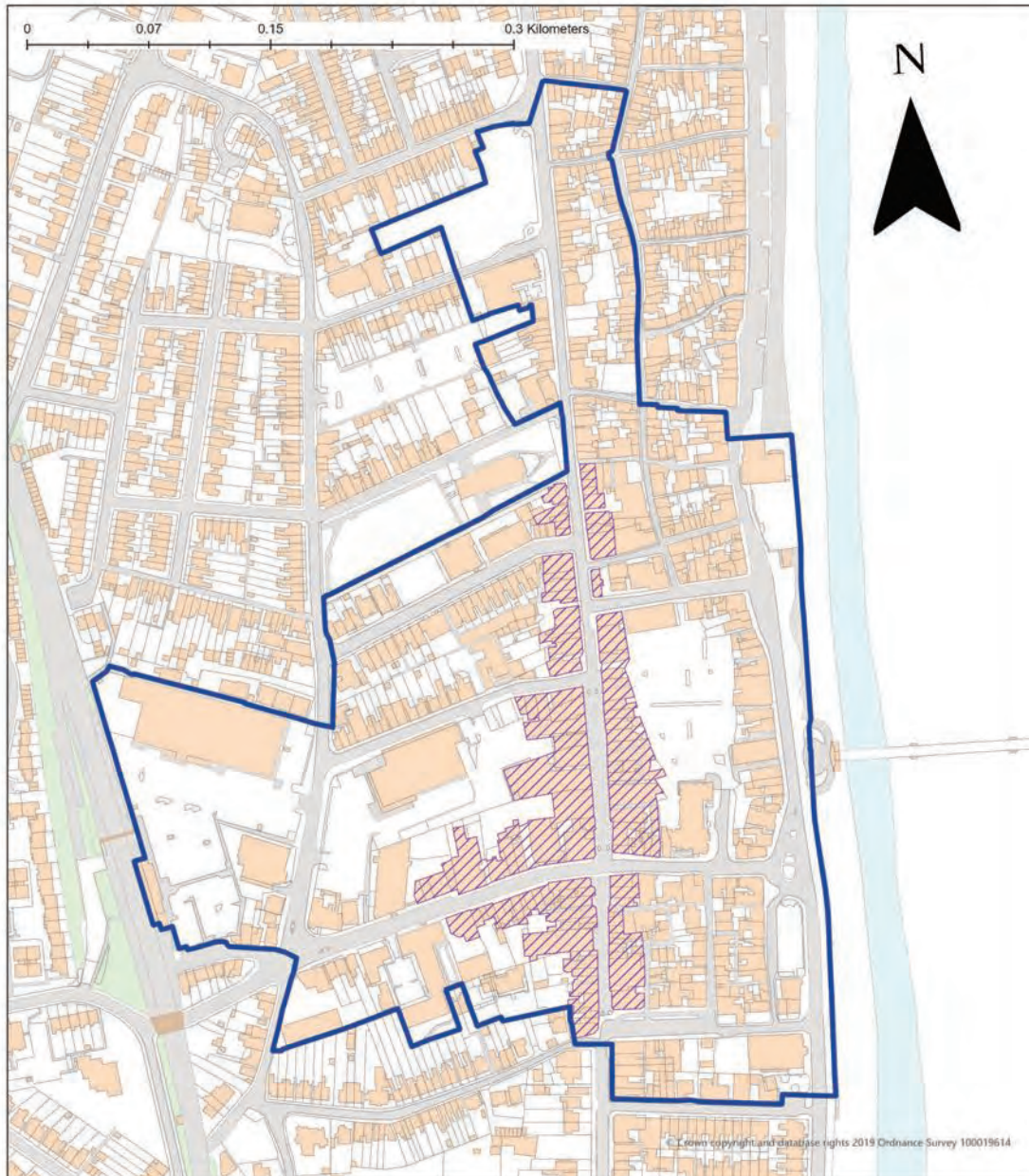
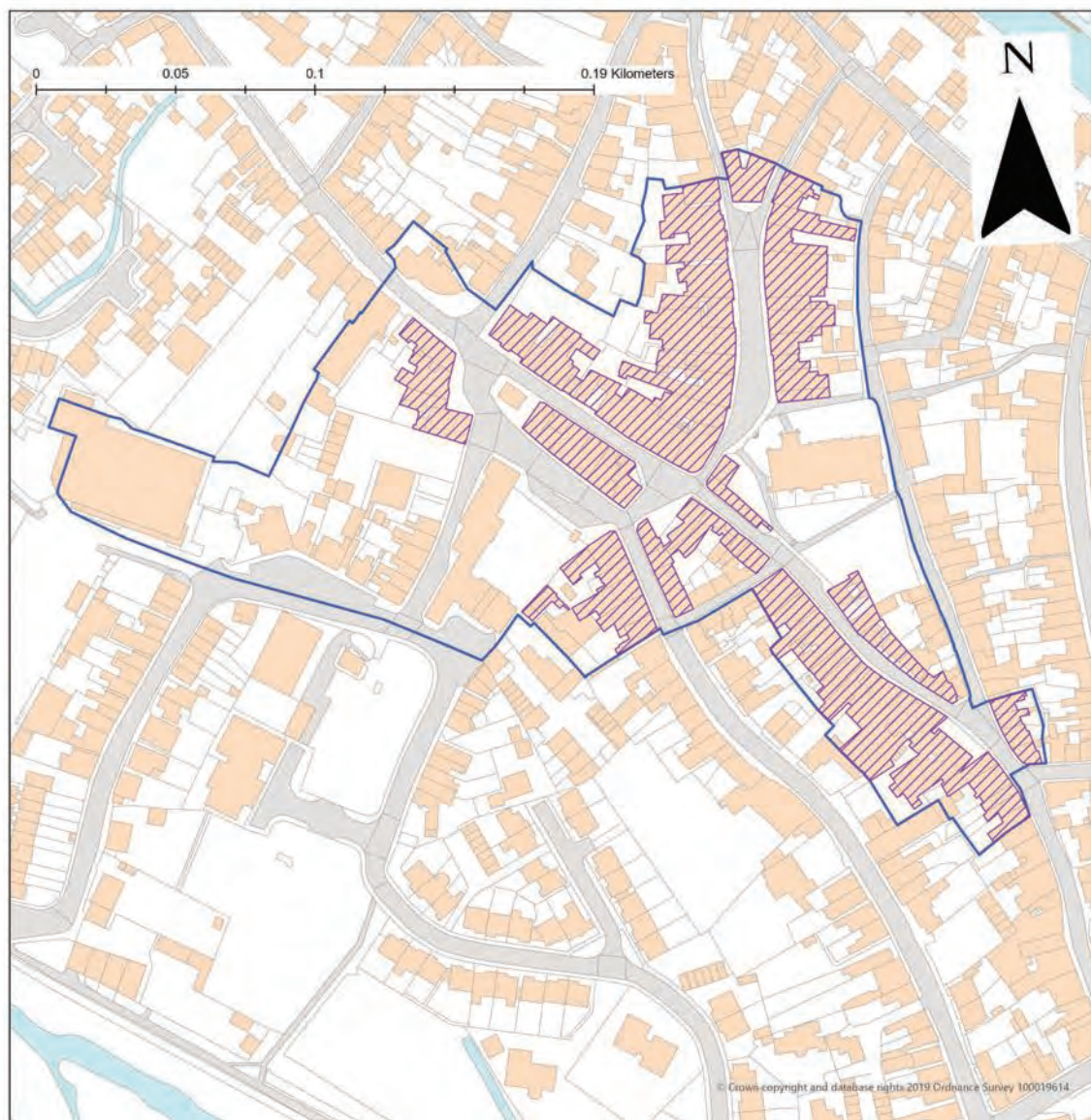


Figure 8.3

## Sandwich Town Centre Boundary and Primary Shopping Areas





-  Primary\_Shopping\_Areas
-  Town Centre Boundaries

Figure 8.4

## Strategic Policy 12: Deal and Sandwich Town Centres

The Council will support in principle proposals which continue to place Deal and Sandwich at the heart of the communities they serve, and their role as vibrant town centres offering a range of compatible uses reflecting their individual character and economies. The commercial function of the town centres will contribute and support the overall economic strategy for the district and respect and enhance the conservation areas within which the primary shopping areas are situated. Proposals within the town centre boundary will be expected to continue to serve the local communities with a range of shops and services and contribute to the tourism offer and visitor uses.

New development should make a positive contribution to improving Deal and Sandwich town centres viability and vitality, support the creation of a safe, attractive, accessible and high quality environment, improve the overall mix of land uses in the town centres and enhance connectivity, both within the town centres and to adjoining areas.

Proposals for improving public realm; investing in existing and establishing new green infrastructure; and enhancing visitor experience will also be supported.

### Retail and Town Centres

**8.70** Town centres have been changing and will continue to do so through the plan period. They are no longer solely supported by traditional retail development and in order to provide vibrant places for our communities and visitors, we need to enable our Town Centres to be resilient to withstand the pressures of change by allowing them to adapt. Our Town Centres are community hubs and encompass cultural, leisure, arts and heritage uses that in turn support the tourism industry, as well as the retail and commercial uses.

**8.71** Generally town centres and high streets are comprised with a close grouping of shops selling a wide range of products. Customers can fulfil the majority of their shopping needs in one trip, as well as providing the opportunity for comparing the price and availability of less frequently purchased goods. The presence of non-retail businesses in primary shopping areas can inhibit these activities by reducing the range of shops, which can reduce the number of people visiting the centre, as well as making the centre less compact and therefore less convenient and appealing. Local consumer choice needs to be maintained in order to ensure town centres can function effectively and to retain their overall vitality and viability.

**8.72** The Council recognises that the flexibility provided by the current permitted development rights for commercial uses means that some changes of use would not require planning permission. Where planning permission is required the retailing and town centres policy will apply.

**8.73** Residential development plays an important role in the vitality and viability of our centres, bringing people into the town at different times of the day, increasing footfall and supporting a more vibrant evening and night time economy. We need to provide a balance between protecting our town centres from an overall erosion of those characteristics which make a vibrant town centre and enabling residential uses through appropriate parameters. Residential uses at ground floor within the primary shopping areas would be severely detrimental to the overall vitality of our town centres, by fragmenting the retail and commercial uses, but also creating incompatible living conditions for potential occupiers. There are also issues with the conversion of traditional shopfronts to allow for suitable residential frontages. These competing requirements are not always compatible within the more traditional core town centre areas.

**8.74** Residential uses at ground floor level within the primary frontage areas of Dover, Deal and Sandwich will not be permitted. In considering changes of use within the town centres we will apply the principles that proposals will need to be able to attract vibrancy, activity and pedestrian footfall to the town centre during the day time. Proposals will need to be compatible with a retail area, to include an active shopfront and be immediately accessible by the public from the front elevation. They would not have an unacceptable impact on the retail function of the frontage, the attractiveness, or on the vitality and viability of the primary shopping frontage.

## DM Policy 25: Primary Shopping Areas

Primary shopping areas are defined for Dover, Deal and Sandwich Town Centres as set out on the policies map. Within the Primary Shopping Areas, the Council will support in principle, retail and main town centre uses and commercial, business and services falling within Planning Use Class E, where proposals:

- 1 Maintain and enhance the vitality of these centres; and
- 2 Enable the interchange between town centre uses and uses falling within Use Class E where they would not harm the vitality and range of uses.

Proposals will need to take into account the following:

- i The ability to attract vibrancy, activity and pedestrian footfall to the town centre
- ii Whether the proposal includes an active frontage and is immediately accessible by the public from the front
- iii The impact of the proposal on the character and function of the town centre

The Council will support proposals to bring upper floors back into beneficial use, including for residential use.

Changes of use to residential will not be permitted on the ground floor of any unit within the Primary Shopping Frontage.

## The Sequential Test and Impact Assessment

**8.75** Local planning authorities are required by the National Planning Policy Framework (NPPF) to apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up to date Local Plan. Applications for main town centre uses should be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale.

## DM Policy 26: Sequential Test and Impact Assessment

Proposals for retail development which are not located within the Primary Shopping Areas or for other 'main town centre uses' which are not located within the boundaries of Dover, Deal or Sandwich Town Centres (as set out on the policies map) and are not supported by other policies in this plan, will only be permitted if all of the following criteria can be met:

- 1 A sequential assessment has been carried out that demonstrates that no suitable sites are available, firstly in the primary shopping area for retail, or the town centre boundary for other town centre uses, then edge of centre locations. Only if no sites are available in these locations should out of centre locations be considered. Preference will be given to sites that are well connected to a town centre; and
- 2 The proposal, either by itself or in combination with other committed development proposals, will not have a significant adverse impact on investment of the vitality and viability of a town centre, or any significant adverse impact upon the town centres can adequately be mitigated. Proposals for retail development which are greater than 350sqm, will be required to carry out an impact assessment. Other main town centre uses will be required to carry out impact assessments in line with the requirements of the NPPF.

### Local Centres

8.76 Whilst the majority of the districts day to day needs are served by shops within designated centres, there are a number of small individual convenience shops (below 280sqm floorspace) in locations where shops in the rest of the hierarchy are not within a convenient walking distance. These standalone shops provide a vital role in reducing car dependency and provide an accessible service at a local level and within the more rural communities. The Council will resist the loss of these smaller convenience stores in order to continue to create sustainable communities and reduce the need to travel. Where there are proposals for any new convenience stores, these will serve the local population and be of an appropriate scale to the locality.

## DM Policy 27: Local Centres

The Council will protect individual convenience shops outside designated centres, even where ancillary to another use (such as petrol stations). Proposals for a change of use or alternative use will only be supported where:

- i The retail unit is vacant; and it can be clearly demonstrated through evidence of extensive, active and realistic marketing over a period of at least 12 months that there is a lack of demand for in the first instance an alternative convenience shop and then alternatively any other comparable E class use in that location; or
- ii Alternative convenience retail provision is available within an 800m walking distance (not straight line distance); or
- iii The replacement land use offers compelling benefits which outweigh the loss.

New individual small convenience shops, which do not exceed 280 sqm gross, will be supported where proposals demonstrate they serve the local population and are of a scale appropriate to the particular centre. Extensions to individual small convenience shops should not create a unit which exceeds 280 sqm gross.

## Shop Fronts

**8.77** The character and attractiveness of an area can be added to by the quality and variety of its employment and retail shop fronts. High quality shop fronts can improve the public realm by being attractive to look at, provide coherence to the street scene and facilitate opportunities for informal gatherings. Insensitive shopfronts can damage the character of a building and the wider street scene and is of significant importance when considering the impact on conservation areas and listed buildings. Shop fronts using security shutters and grills can be particularly unattractive and can diminish the vitality of a commercial area.

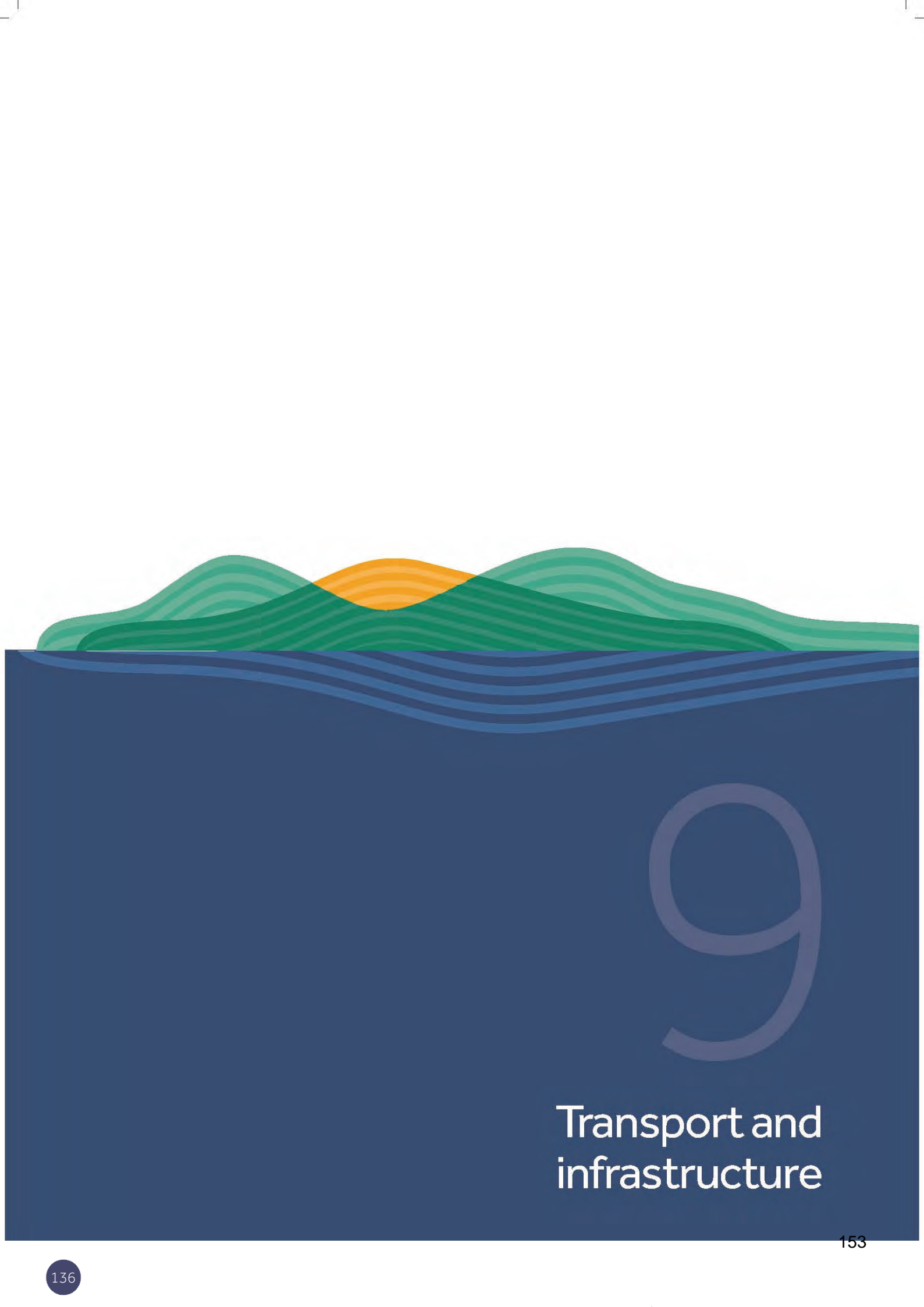
## DM Policy 28: Shop Fronts

New, replacement and alterations to employment and retail fronts will be supported where:

- i The scale, proportion, composition, design and decorative treatment are in keeping with the character and appearance of the building and wider street scene;
- ii Proposals are considerate of the architectural styles and materials of the building and character of the wider street scene; and,
- iii Architectural or historic fronts are kept and restored.

Proposals for security shutters and grilles will not be supported if they would detract from the character and appearance of the building or wider street scene.





Transport and  
infrastructure

**9.1** This section sets out the Council's strategy for transport and infrastructure provision in the District and covers:

- What the key issues are in relation to transport and infrastructure provision in the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Infrastructure and developer contributions;
  - Strategic highway infrastructure;
  - The highway network and highway safety;
  - Parking provision on new development;
  - Providing open space;
  - Playing pitch strategy;
  - Protection of open space;
  - Community facilities; and
  - Digital technology.

## What are the key issues to consider?

**9.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to transport and infrastructure:

### Infrastructure

**9.3** Ensuring that the right infrastructure, is provided in the right place, at the right time, to support the scale of growth identified in the Plan will be integral to its successful delivery. This will require the plan to provide for the needs of young people in the District, in relation to access to education, services and facilities and the need for the Council to work with our partners to address existing deficiencies in infrastructure provision, to ensure the needs of the growing population are met.

### Transport and Highways

**9.4** As the District grows, we need to find more sustainable transport solutions, to cut the amount of private car use, traffic and resultant pollution. We need to help people be more active (to walk and to cycle more) as part of their daily travel routine. We need to facilitate this through the provision of high quality public realm and landscape design, to create streets where people can enjoy walking, cycling or just spending time. Delivering on this ambition will lead to improved health through an increase in physical activity; reduced congestion on the highway network by providing better travel choices; and safer active travel.

**9.5** In view of the climate change emergency that the Council has declared there needs to be a major shift in how people view car ownership and use the private car, particularly for short journeys, to tackle climate change, reduce carbon emissions and improve air quality. New developments need to provide a range of 'smarter' sustainable transport options to give people the choice to not use their car for every journey, which will enable people to live healthier and more sustainable lives. This needs to be balanced with the need to address car parking for new developments on-site to ensure that it does not lead to parking overspill and have an adverse impact on neighbouring streets.

**9.6** There is a need to ensure any necessary highway improvements on the local and strategy road network can be delivered. Further, there is a need to work with our partners to improve strategic traffic management to, and through Dover Town whilst minimising the negative impact of cross-channel traffic.

## Open Space and Community Facilities

9.7 There is a need to improve the provision of good quality sports facilities, to meet the District's needs and increase participation in sports and physical activity, particularly among children and young people, to tackle obesity and improve health and well-being. There is also a need to developing a Green Infrastructure network of public open space provision throughout the District, to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating multiple uses. Further, it is recognised that valued Open Spaces within the District need to be retained and protected, particularly where they contribute to the unique cultural and historic significance of the district.

## Digital Infrastructure

9.8 There is a need to responding to the requirements of the digital economy for superfast broadband connections and good coverage across the District, together with the implications for living and working patterns.

## How could these be addressed through planning policy and what is our preferred approach?

9.9 Policy options include:

### Infrastructure

9.10 For infrastructure, within the existing Core strategy strategic policy CP6 places an overarching requirement for necessary infrastructure to be considered on a case by case basis. The land value uplift is primarily captured using Section 106 agreements. The Council's preferred approach would be to broadly continue this approach though refine this through the identification of site specific needs informed by the Infrastructure Delivery Plan and identified within the site allocation policy. It is not proposed to apply a minimum threshold in recognition that even the smaller sites may have an impact upon existing infrastructure which it could viably mitigate.

9.11 A policy alternative would be to introduce the Community Infrastructure Levy (CIL) which would allow a set financial amount to be captured from all development. The rate would be informed by the whole viability study and would likely include areas where no financial contribution could be sought. A further policy option would be to set a threshold below which developer contributions would not be sought.

## Strategic Transport Infrastructure

9.12 It is the Council's preferred option to provide local plan policy support for upgrades to the A2 as identified as a pipeline project Department for Transport Road Investment Strategy 3. A policy alternative would be to not include such a policy. A further policy option would be to include reference to those allocations which will be expected to contribute funding to the scheme.

## The Highway Network and Highway Safety

9.13 The existing Core Strategy does not currently set defined parameters for when Transport Assessments and Travel Plans may be required. It is the Council preferred option to retain this flexibility as it is the sites location as well as the extent of development that will dictate the need for further assessment. An alternative policy option would however be to set firm thresholds for when Transport Assessment and Travel Plans are required.

9.14 Similarly, the Council's preferred policy option would be to continue to allow the assessment of what constitutes a severe residual cumulative impact on the local highway as subjective to be considered on a case by case basis. A policy alternative would be set out distinct parameters to inform this assessment.

**9.15** The Kent Local Transport Plan 4 currently identifies the potential for a North Deal A258 Eastern Connecting Road. The proposal is not currently required to mitigate the impact of development set out in this Plan, and significant environmental constraints have been identified. However this does not preclude the proposal from being considered as a future possibility.

## Parking Provision

**9.16** The Council will be reviewing all parking standards as part of a wider parking strategy review. It is anticipated that this will define maximum car parking standards (maximum number of parking spaces permitted) for both new residential and, where appropriate, non-residential developments across the district. This may include geographically tapered maximums for residential developments reflecting their location. Ahead of this, it is the Council's preferred option to continue to rely upon KCC derived standards which included maximum parking standards. Residential development with nil parking provision will be encouraged in appropriate locations though not mandated.

## Community Facilities and Open Space

**9.17** The NPPF requires policies governing the provision of open space to be underpinned by up-to-date evidence. The Council's preferred option is therefore based upon new standards produced by specialist open space consultants. An alternative would be to not have a policy governing provision of open space and instead leave it to negotiation on a case-by-case basis using the provisions of the NPPF. A further reasonable alternative would be to continue to rely upon the standards established within the existing Local Plan under Local Plan Policy DM27.

**9.18** The Council's preferred policy option also sets out recommended thresholds for the different Open Space typologies to either be provided on or off-site. An alternative option could be either higher or lower thresholds for each.

## Playing Pitches

**9.19** The Council's preferred policy option is for residential developments of ten or more dwellings to make financial contributions to off-site outdoor sports facilities as set out within the Council's Playing Pitch Strategy, developed in line with Sports England guidance. A reasonable alternative option would be an alternative threshold or to rely on a case-by-case negotiation.

## Loss of Open Space

**9.20** The Council's preferred option will only allow the loss of open space either following a robust assessment which demonstrates it is surplus to requirements or is replaced with an alternative use or facility which demonstrably provides a net benefit to the community. In all circumstances the amenity significances of the existing Open Space is to be considered.

**9.21** A reasonable policy alternative would be to not define the conditions by which a surplus may exist, allowing assessment to be undertaken on a case-by-case basis. A further reasonable policy alternative would be to designate such land that may be identified by the community through this regulation 18 consultation, and is shown to meet the Criteria of NPPF paragraph 100. Whilst no such sites are currently known to the Council, it is reasonable to anticipate sites meeting the criteria for Local Green Space designation may be put forward through this regulation 18 consultation. The extent to which they are will inform the final policy position.

## Community Facilities

**9.22** The Council's preferred policy option is to put communities at the heart of decision making around those facilities most important to them. This will include support for proposals which seek to retain or provide new community facilities and a requirement to consult with the community before apply to change community facilities. A reasonable policy alternative would be to specifically identify those community facilities that should be protected and the specific criteria that would need to be met before they could be lost i.e. a minimum period of marketing.

## Digital Technology

**9.23** It is the Council's preferred policy option to require all new residential and employment development to have a gigabit capable internet connections. As this is a technology neutral requirement, a reasonable policy alternative would be to specify the technology to be used, such as fibre-to-the premises (FTTP). A further alternative would be to not have this policy at all as it is the Governments intention to make this a building regulation requirement.

## Draft Policies and Supporting Text

**9.24** Our preferred policy approach to transport and infrastructure in the District over the Plan period, and the justification for this, is set out below:

## Infrastructure and Developer Contributions

**9.25** It is clear from the engagement undertaken so far that the need for ongoing investment in infrastructure, particularly transport related, is an understandably high priority for local communities. Maintenance of adequate infrastructure and expansion to meet growing needs is generally the responsibility of the relevant infrastructure provider. Most infrastructure providers work to statutory requirements and have set, short-term planning cycles and asset management plans. As part of the plan-making process, the Council is therefore engaged with a range of infrastructure providers to understand the essential infrastructure needed to support the development strategy.

**9.26** This information will be brought together in the Infrastructure Delivery Plan which is to support and inform the plan. An Infrastructure Delivery Plan is an iterative document that sets out the infrastructure that is required to be delivered to support the planned development set out within this Plan. The Council also intends to publish a developer contributions SPD to provide further guidance and clarity on the Council's approach to collecting developer contributions.

**9.27** Once site specific requirements are known, they will be identified through the site allocation policies. It will not however always be possible to foresee all potential needs arising from development proposals (particularly windfall development). The Council preferred policy wording therefore ensures all development will need to be assessed at the time of planning application against relevant policies.

**9.28** The Council will wish to be assured that new development can be supported by existing levels of infrastructure or, if not, that the necessary additional infrastructure will be provided at the right time. The Council currently primarily use Section 106 legal agreements to achieve this, supported by Section 278 highway agreements led by the highway authority or planning conditions as appropriate.

**9.29** It is not the Council's current intention to introduce the Community Infrastructure Levy as Section 106 legal agreements are considered to provide a greater level of certainty for delivery of specific infrastructure. Further, changes to the CIL Regulations in 2019 now allow for more than five contributions to be pooled together, removing what was a significant impediment to securing Section 106 funding from smaller sites.

## Strategic Policy 13: Infrastructure and Developer Contributions

The Council will continue to work with relevant service providers to ensure that infrastructure is delivered, in the right place, at the right time, to meet the needs of the District and support the levels of development identified in the Local Plan.

Where development would create a need to provide additional or improved infrastructure and amenities, would have an impact on the existing standard of infrastructure provided, or would exacerbate an existing deficiency in their provision, the developer will be expected to make up that provision. This shall be through the direct provision of the infrastructure or by a proportionate contribution towards the overall cost of such.

Supporting infrastructure should be provided in advance of, or alongside, the development, unless there is sufficient existing capacity. The appropriate phasing for the provision of infrastructure will be determined on a case by case basis.

The Council will use various mechanisms to achieve this, including Section 106 legal agreements, Section 278 legal agreements and planning conditions.

In determining the nature and scale of any provision, the Council will have regard to viability considerations and site-specific circumstances.

### Strategic Transport Infrastructure

**9.30** Ensuring that an effective and sustainable transport network is delivered and maintained in the District is vital for overall sustainable growth.

**9.31** With the anticipated construction of a new Lower Thames Crossing, a second strategic route will be available between Dover and the Midlands and North. Coupled with the ongoing Western Docks revival plus expansion of the existing Port, it is a Kent wide strategic priority to encourage bifurcation of port traffic between the A2 and the M20. It is considered that such bifurcation will facilitate growth at Whitfield, reduce pressure on the A20 through Dover, whilst also bringing benefits outside the district at Folkestone, Ashford and Maidstone by releasing capacity on the M20. To achieve this, traffic for the eastern docks will need to be encouraged to use the M2/A2 corridor.

**9.32** It is now therefore of critical importance that the long-term aspiration of upgrades to the A2 within the district are realised. This includes duelling sections of single carriageway on the A2 north of Dover along Jubilee Way to Whitfield and near Lydden, upgrades to the Whitfield Roundabout and upgrades to the Duke of York Roundabout.

**9.33** The national significance of this is recognised with the inclusion of the A2 Dover Access projects in the Department for Transport Road Investment Strategy (RIS) for 2020- 2025 published March 2020, as a RIS3 pipeline project to be developed into schemes for construction in Road Period 3 (2025/26 to 2029/30). The Council will therefore continue to work closely with key partners including Highways England, Kent Highways and developers to ensure that this scheme is realised.

**9.34** With respect to Rail, the High Speed rail services from Dover to St Pancras have significantly reduced journey times to London, making the journey more attractive to commuters. However, further investment is required on the whole network to increase service capacity. The Council is therefore pressing for a journey time of less than 1 hour between Dover and St Pancras, along with additional capacity on the High Speed route and associated station improvements.

## Strategic Policy 14: Strategic Highway Infrastructure

The Council is committed to working with Highways England to facilitate major, long-term improvements to the A2 through the Dover Access project identified by the Department for Transport's "Road Investment Strategy".

As such, promoters of sites close to the A2 will need to take account of any emerging proposals by Highways England or any other licensed strategic highway authority appointed by the Secretary of State under the Infrastructure Act 2015. Proportionate developer contributions will be sought from new development for which this mitigation is necessary.

**Proposals which undermine the delivery of the Dover Access project will not be supported.**

### The Highway Network and Highway Safety

**9.35** Traffic generated by development should normally be targeted towards the primary and secondary route network in the District. Other routes should not be subject to inappropriate levels of traffic generation or unsuitable traffic movements.

**9.36** The development set out in this Plan has been tested through the Dover and Deal Strategic Transport model. This work has identified parts of the road network that will need to be upgraded in order to accommodate the development. Further work is required to identify the specific mitigation required, and this will be developed through the next stages of the local plan process in advance of the regulation 19 stage. Site specific requirements and considerations that are currently known are set out in the relevant site allocation policies.

**9.37** When development proposals are likely to generate a significant demand for travel, in terms of the volume, type and relationship to transport networks, a transport statement (for relatively small implications) or a transport assessment should be prepared. The need for a statement or assessment should be decided through discussions with the planning and highway authorities. The purpose will be to identify the levels, type and pattern of travel and to consider how this might be managed to encourage walking, cycling and the use of public transport and to decrease potential private vehicular travel.

**9.38** It may be desirable or necessary for any proposed management measures to be supported through the development and implementation of a travel plan for the proposed development. Travel Plans should be submitted alongside planning applications which are likely to have significant transport implications. A robust Travel Plan will consist of detailed measures, targets, monitoring and sanctions.

**9.39** These are designed to influence the travel behaviour of individuals and of organisations to help achieve transport objectives.

## DM Policy 29: The Highway Network and Highway Safety

Developments that would generate significant traffic movements must be well related to the primary and secondary road network. Proposals which would generate levels and types of traffic movements resulting in severe cumulative residual impacts in terms of capacity and road safety will not be permitted.

New accesses and intensified use of existing accesses onto the road network will not be permitted if it would result in a clear risk of crashes or traffic delays unless the proposals can incorporate measures that provide sufficient mitigation.

Applicants must demonstrate that traffic movements to and from the development can be accommodated, resolved, or mitigated to avoid severe cumulative residual impacts. A Travel Plan, or a Transport Assessment may be required depending on the nature and scale of the proposal and the level of significant transport movements generated, the requirements of which will be secured by planning condition or Section 106 legal agreement.

### Parking provision

**9.40** In managing the availability of car parking, there is a need to balance the impact of car use with the need to provide access to services and opportunities. The availability, cost and location of parking all influence whether someone uses the car. There is therefore a need to balance the need for parking with the need to manage the use of the private car.

**9.41** Currently, for residential and commercial parking standards, the Council applies the Parking Standards for Kent developed and adopted by Kent County Council in 2006 as supplementary planning guidance and further refined within the Kent Design Guide Review: Interim Guidance Note 3. It should however be noted that these contain maximum parking standards and the NPPF states maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network. The Council is therefore currently in the process of updating its car parking strategy which will consider local standards further.

**9.42** The need to respond to the challenges of climate change coupled with the need to optimise the density of development in locations that are well served by public transport is likely to mean maximum standards remain appropriate for the Districts urban areas and nil provision will be encouraged where appropriate. Even in the more suburban and rural areas it is recognised that over-provision can give rise to developments which are visual dominated by parked cars without appropriate design consideration. This must however be balanced against the risk of under-provision of car parking which could cause overspill and congestion on surrounding streets. Whilst the Parking Standards for Kent does contain maximum standards, these have generally proved appropriate for Dover District. It is therefore considered these should continue to be used as a starting point for establishing parking provision ahead of the emerging parking strategy.



## DM Policy 30: Parking Provision on new Development

The standards set out in the Parking Standards for Kent SPD and Kent Design Guide Review: Interim Guidance Note 3 shall be the starting point for decision-taking on acceptable parking provision in developments.

The parking provision on residential development shall take account of local circumstances including the layout of the development, the mix of dwellings, the character of the local area and the proximity of public transport.

Residential development proposed with no parking provision will be supported where it is located in easy walking distance of a range of services and facilities, there is suitable access to non car based modes of transport, and it is demonstrated that the lack of provision will not be to the detriment of the surrounding area.

### Community Facilities and Open Space

**9.43** Access to high quality open spaces and opportunities for sport and recreation provides a vital contribution to community health and well-being. Growth expected in the District will increase the pressure on existing open space resources; therefore it is important to plan positively to meet the additional demand by enhancing existing facilities or creating new open spaces and securing their maintenance in the long term. The NPPF states that local planning authorities should base their policies for open spaces on robust and up-to-date assessments of local needs. Furthermore, these assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area.

**9.44** Consultants Knight Kavanagh & Page (KKP) have undertaken an Open Space Assessment of all accessible open spaces across the District. The study identifies the quality, quantity and accessibility of current provision, produces local provision standard recommendations in accordance with relevant guidance and local needs, and identifies opportunities to protect and enhance the existing provision. By ensuring that new residential development delivers open space that meets these standards, the plan can ensure that the supply of open space keeps up with population growth.

9.45 The following typologies were assessed:

Typology		Primary purpose
Accessible greenspace	<i>Parks &amp; gardens</i>	Accessible, high quality opportunities for informal recreation and community events.
	<i>Amenity greenspace</i>	Opportunities for informal activities close to home or work or enhancement of the appearance of residential or other areas
Natural & semi-natural greenspace		Wildlife conservation, biodiversity and environmental education and awareness.
Provision for children & young people		Areas designed primarily for play and social interaction involving children and young people, such as equipped play areas, MUGAs, skateboard areas and teenage shelters.
Allotment		Opportunities for those people who wish to do so to grow their own produce as part of the long-term promotion of sustainability, health and social inclusion.

Table 9.1

9.46 A development should make appropriate provision of open space to meet its own needs. Where sufficient capacity does not exist, the development should contribute what is necessary either on-site or by making a financial contribution towards provision elsewhere.

9.47 It is recognised that open spaces of a small size hold less recreational use and value. The presence of additional smaller sites will also add to the existing pressures of maintenance regimes and safety inspections. It is therefore considered not all developments should provide new open space on-site and that this is largely dictated by the size of the development.

9.48 KKP have recommended a minimum area threshold for each typology is used to determine if provision should be provided on or off site. This means that when a development alone generates sufficient new residents to require the need for entirely new provision, this provision will be provided on that site. These suggested residential unit thresholds have been refined to reflect local occupancy data and rounded to the nearest 5 units. For new parks and gardens and allotments any on-site provision will be reflected within the site allocation policy. For natural and semi-natural this is considered within the Green Infrastructure Policy. For all other typologies, the refined thresholds are set out in the following policy.

## DM Policy 31: Providing Open Space

Residential development of ten or more dwellings will be required to provide or contribute towards the provision of open space that meets the needs of that development. The following criteria shall apply:

a) Where new open space is provided, it should meet the following quantity and access standards:

Open space type		Quantity standards (per 1,000 population)		Access standard (maximum distance from the new homes)
Accessible greenspace	<i>Parks &amp; gardens</i>	1.91	0.45	1,200 metres or 15-minute walk time
	<i>Amenity greenspace</i>		1.46	800 metres or 10-minute walk time
Allotment		0.21		1,200 metres or 15-minute walk time
Provision for children & young people		0.06		Strategic sites: 1,200 metres or 15-minute walk time Non-strategic sites: 600 metres or 7.5-minute walk time

Table 9.2

b) Developments that reach the thresholds in the table below will generally be expected to provide new open space of the following typologies on-site. This on-site open space provision will be of the minimum size prescribed within the table.

Open Space type		Number of dwellings	Minimum area to be provided on site
Amenity greenspace		40	0.4 ha
Play areas[1]	Local Area for Play (LAP)	25	0.01 ha
	Locally Equipped Area for Play (LEAP)	100	0.04 ha
	Neighbourhood Equipped Play Area (NEAP)	260	0.10 ha

Table 9.3

c) Where open space is to be provided on-site, this should be supported by a governance strategy which will need to be agreed with the Council. This strategy will need to set out what facilities are to be delivered and by when, and how and when they will be managed over time to an acceptable

standard. The open space could be offered to the local Town or Parish Council, the District Council or appropriate community group or charity, subject to payment of a commuted sum. Should a private management company model be promoted, then it will need to be established and run in a way that is affordable, gives the residents a key governance role and is focused towards the management of the facilities to be delivered by the development.

d) Where open space is to be provided off-site a commuted payment will be sought for the purpose of funding quantitative or qualitative improvement to an existing publicly accessible open space. Commuted sums will cover the cost of providing and maintaining the improvements.

e) New provision will be delivered via a combination of on-site measures and/or through off-site financial contributions, secured via Section 106 Agreements.

Proposals for new open space shall respond to any existing deficiencies in specific types of open space in the locality of the development. The Council will work with applicants to identify open space needs and will support proposals that deviate from the mix of typologies set out in this policy where deficiencies are corrected, and the full provision of open space is made.

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[1] Minimum recommended size for play areas by Fields In Trust

## Playing Pitches

**9.49** One of the core planning principles of the NPPF is to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs. Paragraph 96 discusses the importance of access to high quality open spaces and opportunities for sport and recreation that can make an important contribution to the health and well-being of communities.

**9.50** Alongside the Open Space Assessment, KKP have also undertaken a Playing Pitch Strategy (PPS). The primary purpose of the PPS is to provide a strategic framework which ensures that the provision of outdoor playing pitches meet local and community needs of existing and future residents and visitors to the Dover District Area. The PPS was developed in accordance with Sport England guidance and under the direction of a steering group led by the Council and including National Governing Bodies of Sport (NGBs) and provides a strategic framework for the provision and management of playing pitches. It is a 'live' document which should be updated on an annual basis.

**9.51** The existing position for all pitch sports is either; demand is currently being met, or there is a small shortfall. There are current shortfalls on grass pitches for football (minimal and only on mini and youth pitches) and rugby union. Further, the KKP assessment has shown through housing growth, demand will be generated for each pitch sport (with the exception of rugby league) to a lesser or greater extent.

**9.52** The PPS provides an estimate of demand for pitch sport based on population forecasts and club consultation. This future demand is translated into teams likely to be generated, rather than actual pitch provision required. The Sport England Playing Pitch New Development Calculator (NDC) adds to this, updating the likely demand generated for pitch sports based on housing increases and converts the demand into match equivalent sessions and the number of pitches required. This is achieved via team generation rates (TGRs) in the Assessment Report to determine how many new teams would be generated from an increase in population derived from housing growth and gives the associated costs of supplying the increased pitch provision. This informs the Playing Pitch Calculator which may be accessed via the Active Places Power website.

## DM Policy 32: Playing Pitch Strategy

Residential development of ten or more dwellings will be required to contribute to the provision of outdoor playing pitch sports facilities, to meet the needs of the development.

For the provision of outdoor playing pitches, proposals will be expected to use the Playing Pitch Calculator to ascertain the level and type of provision needed. A more detailed assessment will then be required in order to take account of the outcomes of the Playing Pitch Strategy so that provision can be appropriately altered or refined to take account of local circumstances and the need to complement the Council's preferred delivery strategy.

New provision will be delivered through off-site financial contributions, secured via Section 106 Agreements.

## Loss of Open Space

**9.53** The NPPF defines Open Space as "all open spaces of public value which offer important opportunities for sport and recreation and can act as visual amenity". The basis for the Council's approach towards open space is to protect from alternative uses the spaces that have been identified through its research. Alternative uses will only be permitted if it can be demonstrated that there would be no quantitative or qualitative loss to the open spaces network or that the use is ancillary to the open space. The sites making up the open spaces network are shown on the proposals map to the Adopted Local Plan and protected by the following policy. It should however be noted that this list is not definitive and simply reflects open spaces known to the Council at this time. All proposals which result in the loss of existing open space that meet the NPPF definition should therefore have regard to the following policy.

## DM Policy 33: Protection of Open Space

Development proposals that involve the whole or partial loss of open space within settlements, outdoor recreation facilities, playing fields or allotments within or relating to settlements, or of built and indoor sports facilities, will not be supported unless either;

- i A robust assessment of open space and sports provision, using the quantity and access standards for open space and sports facilities set out in this Local Plan, has identified a surplus in the catchment area to meet both current and future needs, and full consideration has been given to all functions that open space and indoor built sports facilities can perform, having regard to the existing deficiencies within the local area; or
- ii Any replacement facility (or enhancement of the remainder of the existing site) provides a net benefit to the community in terms of the quantity, quality, availability and accessibility of open space or sport and recreational opportunities.

In all circumstances, the loss of open space will not be permitted if that open space;

- 1 Contributes to the distinctive form, character and setting of a settlement;
- 2 Creates focal points within the built up area; or
- 3 Provides the setting for important buildings or scheduled ancient monuments, or are themselves of historic or cultural value

## Community Facilities

**9.54** The Council recognise that local communities are often best placed to identify buildings or land that furthers their social well being or social interests as well as neighbourhood infrastructure needs. It is also recognised that there may be challenges relating to ensuring sufficient funding for ongoing operational costs associated with a community facility. It is therefore important to ensure that existing land and facilities for community purpose is not lost to other uses without careful consideration of local needs and options for retaining the opportunity in community use.

### DM Policy 34: Community Facilities

Development proposals will be supported which seek to retain, enhance and maintain community facilities that make a positive contribution to the social or cultural life of a community. The particular benefits of any proposal that secures the long term retention of a community facility will be given positive weight in determining planning applications.

Any community facility that makes a positive contribution to the social or cultural life of a community should be retained unless suitable alternative provision is made. The involvement of the local community should be sought in identifying what that suitable alternative provision should be and provided in evidence to support any such application.

Proposals for new community facilities will be supported where they are in accordance with policies in the development plan.

## Digital Technology

**9.55** Technology plays a multi-layered role in how we live, work and play, the importance of which has been highlighted by the Covid-19 Pandemic of 2020. Getting the right technological infrastructure in place at the right time is fundamental to well-planned and successful communities.

**9.56** Paragraph 112 of the NPPF states "Advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being. Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections.

**9.57** Provision and take-up of reliable and high-speed broadband has been a major issue reported by rural households and businesses in certain parts of the District. Slow broadband and inadequate and slow mobile phone coverage are constraints to economic development. Extending the reach of fibre broadband is key for the viability of rural businesses and will also benefit rural residents.

**9.58** Dissatisfaction with broadband speed have been reported in parts of Deal, Whitfield, Capel and Alkham. Currently, 95.14% of the districts premises has access to broadband speeds of 30 Mbps or above, which is just below the national average of 96.4%. The situation is far worse for Gigabit per Second capable broadband typically delivered by Fibre to the Premises (FTTP). Here only 4.02% of the district has such access compare to a national picture of 15.5%. In 2020, BT Openreach announced plans for the roll-out of full fibre connections to rural and urban communities in 251 market towns and villages across the UK by the mid 2020's. This includes the settlements of Deal, Kingsdown, Ripple, Ringwould, Sandwich, Eastry and Worth. This will significantly increase access to Full Fibre Technology across the District.

**9.59** The Department for Digital, Culture, Media and Sport (DCMS) "New Build Developments: Delivering gigabit-capable connections " consultation document makes clear the government's intention to ensure that new build developments receive gigabit broadband by 2025. This is delivered by gigabit-capable connections that can provide speeds of over 1000 megabits per second (Mbps). In due course, it is intended to legislate and to amend the Building Regulations 2010 to achieve this for residential development.

**9.60** Gigabit-capable connections are often, but not always, delivered by full fibre connections and can also be delivered via technologies such as cable and fixed wireless access. The policy below is therefore technology neutral and does not prescribe the type of technology that must be used, provided that it can provide speeds of over 1000 Mbps.

## DM Policy 35: Digital Technology

All new residential and employment development will have gigabit-capable connections.

This will be through the installation by the developer, within the curtilage of the property (or the development), of both:

- i The physical infrastructure necessary for gigabit-capable connections; and
- ii A gigabit-capable connection which may be achieved by an optical fibre or other cabling or wiring that will provide gigabit broadband if such a service is provided by an Internet Service Provider.

Planning applications for development must be supported by a statement that sets how this is proposed to be delivered.



10

Design



**10.1** This chapter sets out the Council's strategy for design and place making and covers:

- What the key issues are in relation to design and place making;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Place Making;
  - Achieving high quality design;
  - Quality of residential accommodation.

## What are the key issues to consider?

**10.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to design and place making:

**10.3** The NPPF (2019) states that Plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. The NPPF (2019) also recommends that plans or supplementary planning documents should use visual tools such as design guides and codes to provide maximum clarity about design expectations at an early stage.

**10.4** The National Planning Policy Framework is supported by a suite of planning practice guidance that is relevant to both design quality and quality in delivery. The underlying purpose for design quality and the quality of new development at all scales is to create well-designed and well-built places that benefit people and communities.

**10.5** The National Design Guide (2019) addresses the question of how we recognise well designed places, by outlining and illustrating the Government's priorities for well-designed places in the form of ten characteristics:

- Context – enhances the surroundings.
- Identity – attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social and inclusive.
- Uses – mixed and integrated.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

**10.6** The report of the Building Better, Building Beautiful Commission, Living with Beauty, published in Jan 2020 highlights a number of issues with the current system and proposes a new development and planning framework which will:

- Ask for beauty and ensure that new developments are beautiful places where people want to live and can flourish;
- Free people from the blight of ugliness by regenerating derelict and damaged places; and
- Ensure long-term stewardship of our built heritage and of the natural environment in which it is placed.

**10.7** At a local level, the Council has adopted the Kent Design Guide as a Supplementary Planning Document. The Kent Design Guide seeks to provide a starting point for good design while retaining scope for creative, individual approaches to different buildings and different areas. It aims to assist designers and others to achieve high standards of design and construction by promoting a common approach to the main

principles which underlie Local Planning Authorities' criteria for assessing planning applications. It also seeks to ensure that the best of Kent's places remain to enrich the environment for future generations. The Guide does not seek to restrict designs for new development to any historic Kent vernacular. Rather it aims to encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.

**10.8** Dover has a rich and diverse built and natural environment, and the District's towns, villages, rural and coastal areas all have their own distinct character and unique history that is valued by local communities. It is important that new development in the District respects this and seeks to enhance the District's environment by creating places that are attractive, well connected and legible, that harmonise with the surrounding built form or landscape, whilst seeking, where appropriate, to embrace the best of modern architecture and design so that innovation is not stifled.

**10.9** New residential developments should not be 'housing led' in respect of their design, instead residential amenity, open space, landscaping and high quality public realm should be at the core of all new schemes to ensure the creation of high quality places. New commercial and mixed use developments should also seek to create places that are high quality in terms of their public realm, where parking and servicing is discreet, and the emphasis is on active street frontages which create safe and welcoming places.

**10.10** Dover Town Centre in particular offers opportunities for significant change through the redevelopment of vacant sites and replacement of poorly designed buildings. Developments with innovative layouts which maximise the use of a site and, where appropriate, make use of multiple levels are encouraged, having regard to local context and the historic setting of the town. Proposed schemes that aim to achieve landmark buildings should be of demonstrably outstanding architecture. Furthermore, good design is not a cost, to be negotiated away once planning permission has been obtained. It is the benchmark that all new developments should meet. Good design should be considered an intrinsic part of good place making and should be considered at the start of the design process for any development.

## How could these be addressed through planning policy and what is our preferred approach?

**10.11** Policy options include:

- Continuing with the existing approach in the current Development Plan of not having locally specific design policies and instead relying on the National Planning Policy Framework, Planning Practice Guidance and National Design Guide when providing advice to applicants and determining planning applications;
- Having one design policy that sets out the Council's over-arching strategy for place making;
- Having additional criteria based design policies that provide further guidance on specific design principles;
- Requiring developments to meet the nationally described space standards in respect of internal accommodation based on local evidence;
- Requiring a percentage of all new build homes to be built in compliance with building regulation part M4(2), based on local evidence; and within new build developments which are affordable, to require a percentage of all new build developments to be built in compliance with building regulation M4(3) (wheelchair accessible homes), based on local evidence;
- Making provisions in policy for the council to provide further supplementary planning guidance on design to raise the quality of new development in the District and create distinctive places.

**10.12** The option to not have specific policies covering design and place making, and to consider planning applications against the NPPF, Planning Practice Guidance and National Design Guide, is considered to provide an insufficient level of guidance for the management of development within the District. Given this, having considered the evidence, opportunities and policy context within Dover, the preferred approach is

to have both a strategic policy on place making and then further criteria based design policies, and this is set out below. Furthermore, the Council considers that sufficient local evidence exists to support the policy requirement for development to meet the nationally described space standards and to require a percentage of development to be built to building regulation M4(2) and M4(3) standard. In addition to this the council also considers it necessary to make provisions in policy to provide further supplementary planning advice on design matters. This is considered to represent the most appropriate method for setting out a clear design vision for the District that enforces local distinctiveness. The preferred approach aligns most appropriately with national legislation and most effectively addresses the issues outlined above.

## Draft policies and supporting text

**10.13** Our preferred policy approach to design and place making in the District over the Plan period, and the justification for this, is set out below:

### Place Making

**10.14** The National Planning Policy Framework (2019) is clear that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

**10.15** Good quality, inclusive design is essential in creating and maintaining places where people want to live and work, now and in the future. Good design is not just about making places visually attractive. It has a fundamental role in achieving sustainable development, helping to create flourishing economies and diverse, vibrant and attractive local communities. The hallmark of good design is a place that is designed around people, with its own identity, that functions well and that creates variety and choice.

**10.16** Delivering development that achieves design excellence, that is of the right type, and in the right location, and that adds to the existing high quality natural and built environment is a key priority for the Council.

**10.17** This policy provides clear design expectations for proposals that come forward in the District and sets out a number of key principles that should inform all development from the earliest stages of the design process.

**10.18** To support this policy approach, the Council will also produce a Local Design Guide for the District. The purpose of this Design Guide will be to provide clarity over what constitutes acceptable design quality for different areas in the District, and thereby provide a level of certainty for developers and the local community alike.

## Strategic Policy 15: Place Making

All development in the District must achieve a high quality of design, that promotes sustainability, and fosters a positive sense of place, by responding to the following principles in an integrated and coherent way. All new development must:

### Context and Identity

- Demonstrate that they understand the context of the area, appreciate existing built form and respond positively to it.
- Enhance character to create locally distinctive design or create character where none exists.
- Have a positive and coherent identity that everyone can identify with and be visually attractive.
- Where relevant, draw inspiration from traditional building forms to inform contemporary designs and materials.

### Built Form

- Make efficient use of land and promote compact forms of development that are walkable, and have access to local public transport, facilities and services.

### Movement

- Integrate into existing areas of the District, be well connected with all transport modes, and prioritise sustainable transport choices.
- Create a clear structure and hierarchy of streets to ensure the development is easy to understand and navigate for all groups in society.
- Give priority to people over cars, and reduce vehicle domination and vehicle speeds.

### Nature

- Demonstrate that they understand the local landscape context and bring green infrastructure into streets, open and public spaces.
- Provide high quality green open spaces with a variety of landscapes and activities, including play, that also deliver enhanced biodiversity and flood mitigation.

### Public Spaces

- Deliver well located, high quality and attractive public spaces that are integrated into the surrounding area, support a wide variety of activities, and encourage social interaction, to promote health, well-being, social and civic inclusion.

### Uses

- Provide a mix of uses that meet local housing and employment requirements and deliver local services and facilities to support daily life and create inclusive and cohesive communities.

### Lifespan

- Be designed and planned to last and be well managed and maintained through long term stewardship models.

To support the delivery of high quality buildings and places in the District the Council will produce a Local Design Guide to provide clear and detailed parameters as a benchmark for design quality in the local area.

## Achieving High Quality Design

**10.19** The District contains many established, attractive areas which are highly valued by residents and which are worthy of protection from damaging and insensitive new development. While there may be capacity to accommodate new development in many parts of the District, it should only occur where proposals are of a scale, density and design that would not cause damage to the qualities, character and amenity of the areas in which they are situated. Such development should also provide attractive high quality buildings and public realm that positively contributes to the area in which it is located, in accordance with good urban design principles. Where appropriate, the use of modern architecture and design will be embraced and innovation supported.

**10.20** There will be a strong expectation that design issues will be dealt with at pre-application stage. Some major proposals will be referred to a Design Review Panel where there are significant design implications.

**10.21** Design and access statements are required with most types of planning application. They should demonstrate how the Council's key design principles, set out in Strategic Policy 15 and DM Policies 2, 36 and 37 and those in Neighbourhood Plans have been taken into account and reflected in project design. The findings of any public involvement in exhibitions or design workshops should be summarised with an explanation showing where they have influenced the design.

### DM Policy 36: Achieving High Quality Design

All new development must:

#### Context and Identity

- i Be well designed, respect and enhance the character of the area paying particular attention to context and identity of its location, scale, massing, rhythm, layout and use of materials appropriate to the locality. The development itself must be compatible with neighbouring buildings and spaces and be inclusive in its design for all users.

#### Built Form

- ii Be of an appropriate density (typically between 30 - 50 net dwellings per hectare) that combines the efficient use of land with high quality design that respects character and context. Higher density development will be encouraged in accessible locations, such as around transport hubs or town centres, where this is appropriate.
- iii Incorporate focal points and destinations to create a sense of place and make it easy for anyone to find their way around.

#### Nature

- iv Ensure that open spaces are designed to be high quality, multi-functional, robust and adaptable over time so that they remain fit for purpose and must be managed and maintained for continual use.

#### Public Spaces

- v Ensure that public spaces are faced by buildings, and are designed to be safe, secure, inclusive and attractive for all to use.
- vi Incorporate trees and other planting within public spaces to promote health and well-being and provide shading.

- vii Ensure that existing features, including trees, natural habitats, boundary treatments and historic street furniture, that positively contribute to the quality and character of an area, are retained, enhanced and protected where appropriate.
- viii Take a coordinated approach to the design and siting of street furniture, boundary treatments, lighting, signage and public art to meet the needs of all users.
- ix Ensure that new advertisements do not detract from the character and appearance of the surrounding area and do not have an adverse effect on public safety.

#### Homes and Buildings

- x Ensure that the siting, layout and design of vehicle and cycle parking (including detached garage blocks) is sensitively integrated into the development; maintains an attractive and coherent street scene; does not prejudice the wider functionality of public and private space; and creates an effective functional link and relationship with the buildings and areas they serve.
- xi Make appropriate provision for service areas, refuse storage (including waste and recycling bins), and collection areas in accordance with the nature of the development. Such areas and access to them should be appropriately sited and designed to ensure they can:
  - Perform their role effectively without prejudicing or being prejudiced by other functions and users;
  - Maintain an attractive and coherent street scene and protect visual amenity; and
  - Avoid creating risk to human health or an environmental nuisance

#### Lifespan

- xii Be adaptable to their users' changing needs and evolving technologies.
- xiii Be robust, easy to use and look after, and enable their users to establish a sense of ownership.

Development proposals must provide evidence to demonstrate how they have responded positively to the design policies in the Local Plan and associated guidance, including national and local design guidance, relevant Neighbourhood Plans, Village Design Statements and site specific development briefs.

Where significant design implications are identified on major proposals these will be referred to a Design Review Panel.

## Quality of Residential Accommodation

**10.22** Internal space within new dwellings is an important factor in creating homes that support a high quality of life and allow households and families to meet their current needs whilst also being flexible enough to accommodate changes in their circumstances.

**10.23** A wide range of other factors also have a significant influence upon the internal and external amenity of dwellings and other types of development. These include levels of sunlight and daylight, relationship with other buildings and elements of the built environment (e.g. Roads), ventilation, and general outlook.

**10.24** Paragraph 50 of the National Planning Policy Framework states that local planning authorities should identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand. The National Planning Practice Guidance further qualifies this by recommending that where a local planning authority wishes to require an internal space standard they should do so by reference in their local plan (paragraph 18).

**10.25** The Council believes that everyone has the right to a high standard of residential accommodation with sufficient space to meet their own needs. There has been a general trend for houses today to be comparatively smaller than ones built a hundred years ago and these trends have led to calls for the introduction of national space standards for housing. The requirement of a minimum space standard can add to the attractiveness of the development and increase the marketability of properties, thereby widening the potential sale and rental markets

**10.26** In order to ensure that new housing is built to a high standard of design and provide adequately for the changing needs of future occupants thereby improving the quality of life, the Council is intending to implement the National Described Space Standard (March 2015). The policy will apply to all tenures and it will be up to the applicant to demonstrate why these standards cannot be met within their development.

**10.27** Given the District has an ageing population, increasingly there will be a need for accessible and lifetime homes, so that new houses meet the needs of the people who live in them and can adapted across their lifetime. Developments will therefore need to be designed to last, and be flexible and adaptive in their design to respond to changes in society.

**10.28** The Strategic Housing Market Assessment (SHMA) 2017 indicates that the population aged 65 or over is going to increase dramatically in Dover District over the plan period; from 28,409 in 2020 to 43,616 in 2040, a rise of 53.5%. The projections also suggest that there will be an increase in the number of households headed by someone over 65 from 18,567 in 2020 to 29,179 in 2040, an increase of 57.1%. As a result of these emerging trends the SHMA partial update December 2019, estimates that by 2040 there will need to be between 9,813 and 10,878 dwellings built to the lifetime homes standard in the District within the general housing stock.

**10.29** In order to meet the changing needs of this increasing age group, the Council will encourage developers to consider the future needs of households when designing residential units. The Council requires as a minimum, all new development to be designed to building regulation optional requirement M4 (2) accessible and adaptable dwellings. In respect of the Building Regulation optional requirement M4 (3) wheelchair user dwellings, in accordance with national guidance this can only be required on units where the local authority has nomination rights, i.e. within the affordable rented element of a development. This requirement will be applied on sites of 20 dwellings or more, where the Council will require 5% of the total dwellings to meet this standard.

**10.30** This policy supports the general aim of the Plan to improve the quality of life and health of the residents of the District and ensuring a high standard of design. These standards aim to future proof new development in a sustainable way ensuring adaptability to changing needs and achieving longevity of design.

## DM Policy 37: Quality of Residential Accommodation

All new development must:

- i Be compatible with neighbouring buildings and spaces and not lead to unacceptable living conditions through overlooking, noise or vibration, odour, light pollution, overshadowing, loss of natural light or sense of enclosure.
- ii Be of appropriate size and layout with sufficient usable space to facilitate comfortable and safe living conditions.
- iii Meet the governments latest Nationally Described Space Standards in respect of internal accommodation;
- iv Meet the accessibility standards set out in Part M4 of the Building Regulations.
  - On schemes of up to 19 dwellings, the Council will expect all new build development to be built in compliance with building regulation part M4(2).
  - On schemes of 20 or more dwellings, the Council will require 5% of the development to be built in compliance with building regulation M4(3) (wheelchair accessible homes), with the remaining development to be built in compliance with building regulation part M4(2).
- v Provide well designed private or shared external amenity space/play space on-site, that is fit for purpose and well related to the development.
- vi Provide flexible and adaptive homes for home working and more intensive use.
- vii Provide sufficient clothes drying facilities.

Planning applications must be supported with clear information to demonstrate that the above requirements have been met.





Natural environment

**11.1** This chapter sets out the Council's strategy for the natural environment and covers:

- What the key issues are in relation to the natural environment for the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Protecting the Districts hierarchy of designated environment sites;
  - Green infrastructure and biodiversity;
  - Biodiversity net gain;
  - Landscape character;
  - Thanet Coast and Sandwich Bay SPA Mitigation Strategy;
  - Air quality;
  - Water supply and quality; and
  - The River Dour.

### What are the key issues to consider?

**11.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to the natural environment:

- Conserve and enhance the District's rich and diverse natural landscape, including the five international sites within the district, the Kent Downs AONB, five SSSIs, two NNRs, two stretches of Heritage Coasts and two Marine Conservation Zones.
- Ensure against an adverse impact on the integrity of the Thanet Coast and Sandwich Bay SPA and Ramsar by reason of non-physical disturbance.
- Improve management of visitor pressure at a number of the District's designated sites, in particular at the Thanet Coast and Sandwich Bay SPA and Ramsar sites, in order to reduce the impact on landscape and biodiversity.
- Deliver a net gain in biodiversity in the District over the plan period.
- Protect and enhance the landscape character and distinctiveness of the District's countryside and coastline, including irreplaceable habitats, the areas of the Kent Downs AONB that fall within the boundary of the District and regionally important geological sites.
- Deliver improvements in air quality over the Plan period.
- Deliver efficiency and quality in water supply.

### How could these be addressed through planning policy and what is our preferred approach?

**11.3** The countryside of Dover District is particularly rich and varied and includes a significant number of sites designated for their international, national and local biodiversity importance. With regard to internationally designated sites, the District Council has a statutory duty to protect habitats and species of European importance and to consider potential significant impacts upon these sites. At the time of writing it is not clear what the future of the UK's relationship with the European Union, and specifically European legislation, will be after December 2020. The *European Union Withdrawal Act (2018)*, section 3, states that the whole body of existing EU environmental laws will be carried over into UK law. However, recent statements issued from the government appear to bring the future of this Act into question. A specific policy is therefore considered essential to ensure the Plan complies with relevant legislation.

**11.4** In this regard, the NPPF requires local planning authorities to enhance their natural environments and as part of this requirement to distinguish between the hierarchy of designated sites in their areas. The option of a single policy addressing the hierarchy of protected biodiversity sites was preferred to separate policies for each tier in the hierarchy international, national and locally designated sites as better fulfilling this requirement of the NPPF and reducing unnecessary repetition within the Plan itself.

**11.5** Regular monitoring of the designated sites in the district, together with ongoing HRA work, has revealed the potential for harmful effects as a result of visitor pressure on the integrity of the internationally protected sites of the district, in particular at the Thanet Coast and Sandwich Bay SPA and Ramsar sites. Under guidance from Natural England, the Council has been proactive in delivering on its legal duty to put in place measures at the Thanet Coast and Sandwich Bay SPA and Ramsar sites to mitigate any potential for harm and to provide positive solutions to reduce or avoid conflict between the demands of recreational pressures and the protected habitats and species. The Strategic Access and Management Plan (SAMP) currently in place for this SPA is based on the levying of a tariff on all residential developments greater than 15 dwellings across the district to contribute to ongoing monitoring and mitigation measures. Given a continued need for such measures, a policy to address this is considered appropriate. Options under consideration include whether a whole district approach remains appropriate or whether a 'Zone of Influence' approach is more applicable, or a combination of both. In addition, options are being considered as to whether the current threshold of 15 or more dwellings for tariff eligibility should be carried forward, or a threshold of 10 or more dwellings, aligned to the threshold for other S106 requirements in this Plan is more appropriate, or whether a tariff should be levied on every new dwelling permitted, as a number of other local authorities have implemented. On the spatial extent of the tariff levy it is concluded, on the current evidence, that a combination of both a Zone of Influence, which visitor survey work concludes should be set at 9km from the SPA, and a whole district approach, is the preferred option. With regard to the quantum of development for which a tariff is required, evidence is not yet concluded and the preferred option in this Draft of the Plan is therefore to require tariff contributions for residential developments of 10 dwellings or more in line with the approach for all other developer contributions arising from this Plan, pending the completion of evidence on this matter. With regard to potentially harmful visitor pressure impacts on the Dover to Kingsdown Cliffs SAC and the Lydden and Temple Ewell Downs SAC, evidence gathering is ongoing.

**11.6** Adverse effects on the integrity of internationally protected sites which are home to endangered and protected species can also occur through non-physical disturbance ie as a result of increased noise, vibrations and light spill. The draft HRA which informs this Plan has recommended wording with respect to the protection of the bird life of the Thanet Coast and Sandwich Bay SPA and Ramsar. This wording is included in Strategic Policy 16 and Policy DM17.

**11.7** Turning to biodiversity, the Environment Bill (at the time of writing going through its final readings in the House of Commons) introduces a legal requirement that all developments provide net gains in biodiversity in perpetuity. As drafted the Bill mandates that such net gains should amount to 10% as a minimum and aim to achieve more wherever possible. As with the duty to protect habitats and species of international importance and to consider potential significant impacts on these sites, such a legal obligation requires a policy to deliver such a net gain across the plan period. The Kent Nature Partnership, of which the District Council is a member, is currently considering a doubling in the requirement to 20% in net gain from all developments across the county. The evidence for the need for a 20% requirement is still emerging and the increased requirement has the potential to impact upon development viability. It is therefore the preferred policy option for Biodiversity Net Gain that it be set at 10% in the Regulation 18 Draft Local Plan.

**11.8** The landscape character of this district is unusually diverse, ranging from marine conservation zones to protected chalk grasslands. More than 20% of its land area falls within the Kent Downs AONB. The current development plan includes policies that seek to protect the countryside and landscape character of Dover

District from inappropriate development (Policies DM15 and DM16). Evidence demonstrates that these policies, along with the relevant paragraphs of the NPPF, are among the most frequently used in the determination of planning applications and appeals. In addition, an extensive and up-to-date evidence base is available to support the inclusion of a locally specific landscape policy within the Plan, rather than the option of relying on the relevant sections of the NPPF. The preferred option is therefore to continue with the current approach but to combine landscape protection policies into one, rather than continue with two as the issues on this matter are aligned. The option of a separate policy for the Kent Downs AONB was considered but the preferred option is to provide coverage within an overarching landscape policy, given the areas of overlap between conserving and enhancing the scenic beauty and character and appearance of the AONB and the other landscapes of the district.

**11.9** The NPPF requires local planning policies to contribute towards compliance with national air quality objectives, and, specifically that opportunities to make improvements in air quality or to mitigate impacts should be identified at the plan-making stage. This district has air quality problems, and two AQMAs, associated with road traffic on the trunk roads leading to the port of Dover and from shipping movements in the port itself. Given that air quality issues are particularly pertinent to individual districts and that mitigation measures are most appropriate when targeted to particular circumstances, the inclusion of a local plan policy on air quality, as opposed to a reliance on policy at a national level only, is therefore considered essential.

**11.10** Similarly, the NPPF requires planning policies to deliver improvements in water quality. The option of relying on paragraph 170 of the NPPF for assessing the impact of proposals coming forward over the plan period on water supply and quality was considered, however it was concluded that the preferred option is for a Dover specific policy, in order to address the specific issues addressing these matters in this district. These include existing water quality target failures in the Stodmarsh European sites in neighbouring Canterbury District and consequent current advice issued by Natural England that a likely significant effect on the Stodmarsh designated sites from development that increases nutrient impacts cannot be ruled out, on objective evidence, at this stage. Finally, the current development plan contains a separate policy for the River Dour, one of two rivers in the District. The option of continuing such an approach was considered alongside the option of including policy requirements for proposals within the river corridor of the River Dour within a water supply and quality policy, given the overlap between issues and the desire to avoid repetition in the new Plan. However, ecology advice was that a separate policy is necessary.

## Draft policies and supporting text

**11.11** Our preferred policy approach to conserving and enhancing the natural environment in the District over the Plan period, and the justification for this, is set out below:

### Protecting the District's Natural Environment

**11.12** Dover District is home to natural assets of international, national and local significance. The district has a rich and diverse natural environment and supports most of the lowland habitat types found within Kent. It is particularly important for coastal habitats, much of which lie within Sites of Special Scientific Interest (SSSIs) and contains a significant proportion of the county's calcareous grassland. The NPPF requires that planning policies should contribute to and enhance the natural and local environment and that Local Plans, in the first instance, should distinguish between the hierarchy of international, national and locally designated sites.

#### International Sites

**11.13** Five internationally designated environmental sites fall, in full or in part, within the boundaries of Dover District:

- Dover to Kingsdown Cliffs SAC
- Lydden and Temple Ewell Downs SAC
- Thanet Coast and Sandwich Bay SPA
- Thanet Coast and Sandwich Bay Ramsar Site
- Sandwich Bay SAC

**11.14** The District Council has a legal duty to consider potential significant impacts on these European sites. This duty is carried out through a Habitat Regulations Assessment (HRA) which accompanies the Local Plan. By virtue of their high-level designation these sites are protected from development, adverse impact and loss.

### National Sites

**11.15** Areas of Outstanding Natural Beauty are national areas of high scenic quality designated for their natural beauty. They have statutory protection in order to conserve and enhance the natural beauty of their landscapes. Approximately 22% of Dover District lies within the nationally protected landscape of the Kent Downs AONB.

**11.16** Sites of Significant Scientific Interest are protected areas identified by Natural England under Section 28 of the Wildlife and Countryside Act 1981 as being of national importance for their flora, fauna, geological or physiographical features. The Countryside and Rights of Way Act 2000 imposes a duty on public bodies exercising statutory functions which may affect SSSIs to take reasonable steps to further enhance the features for which the site is notified as SSSI. There are five SSSIs in this district:

- Dover to Kingsdown Cliffs SSSI
- Folkestone Warren SSSI
- Alkham, Lydden and Swingfield Wood SSSI
- Lydden and Temple Ewell Downs SSSI
- Sandwich Bay to Hacklinge Marshes SSSI

**11.17** National Nature Reserves protect the most important areas of wildlife habitat and geological formations in Britain, as well as being places for scientific research. As such, they are subject to management plans agreed with Natural England and can attract specific funding to help maintain these national assets. There are two National Nature Reserves in Dover District

- Sandwich and Pegwell Bay NNR
- Lydden and Temple Ewell Downs NNR.

**11.18** A number of stretches of the UK coastline are designated by Natural England as Heritage Coasts, based on their notable natural beauty or scientific significance. Heritage Coasts are one of the few places which still offer a feeling of wilderness, with chalk cliffs, foreshores and seabed platforms that are home to distinctive wildlife influenced by the sea and such exposed habitats. Globally coastal chalk is a scarce resource; the UK holds 57% of Europe's resource, Kent holds 35% of the UK resource. The only two areas of Heritage Coast within the county of Kent are found in Dover District:

- Dover to Folkestone Heritage Coast
- South Foreland Heritage Coast.

**11.19** Marine Conservation Zones are designated under the Marine and Coastal Access Act, 2009. These protected marine areas aim to conserve the diversity of nationally rare or threatened habitats and species that are representative of the biodiversity in our seas. There are two Marine Conservation Zones (MCZs) in Dover District:

- Dover to Folkestone MCZ
- Dover to Deal MCZ.

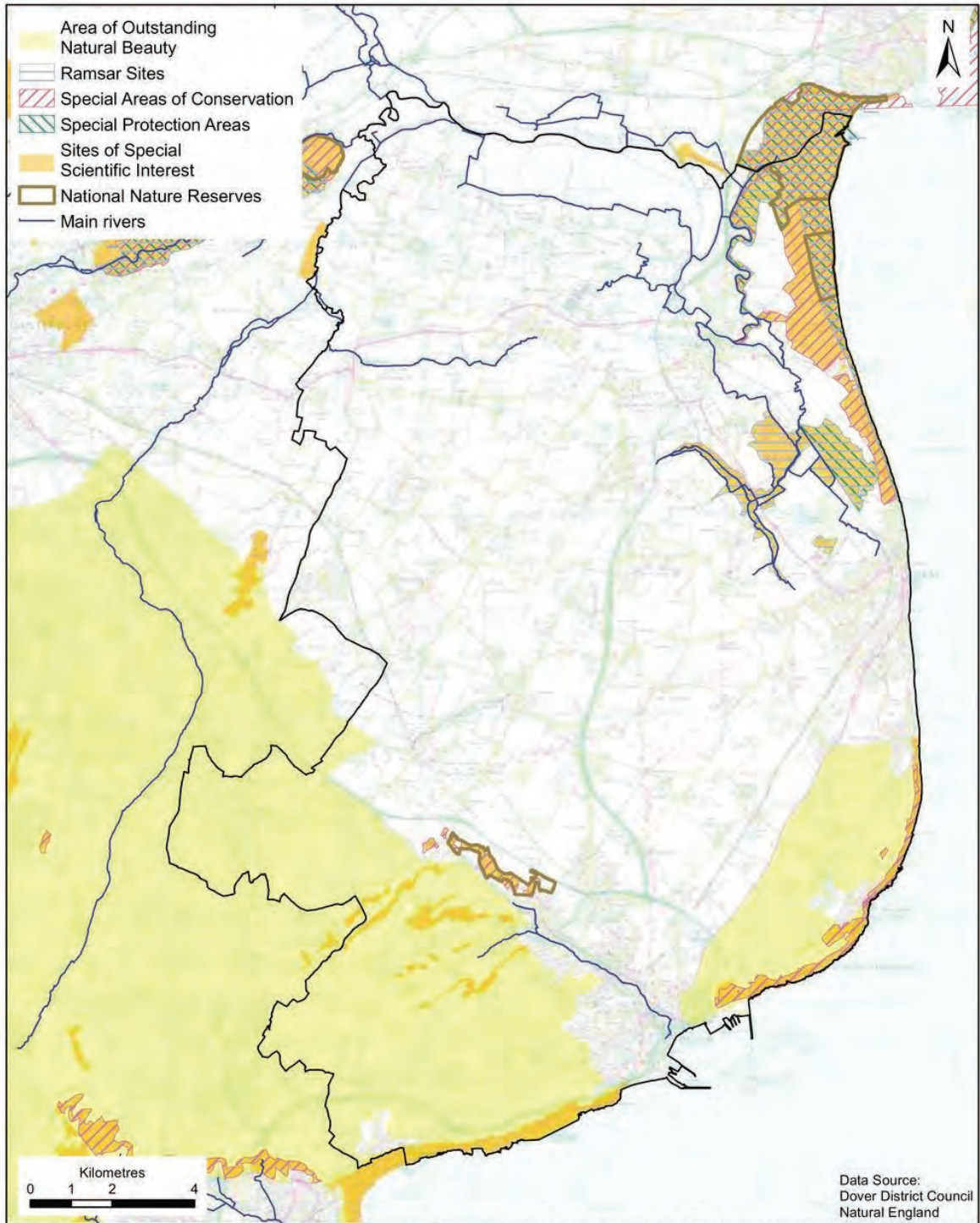
### Local Sites

**11.20** Kent Wildlife Trust has identified, on behalf of the Kent Nature Partnership, 41 Local Wildlife Sites (LWS) within Dover. These are sites of county importance for their wildlife interest and complement designated SSSIs. They are on both public and private land and form an important element of the District's network of green infrastructure, particularly the chalk grasslands which wrap around Dover town.

**11.21** Local Nature Reserves are specifically designated by the Council for public access to nature, under Section 21 of the National Parks and Access to the Countryside Act 1949 and amended by Schedule 11 of the Natural Environment and Rural Communities Act 2006, with the purpose of increasing the public enjoyment and understanding of nature, as well as promoting nature conservation. They provide a significant and long-term contribution to nature conservation and are an important resource for the community, making a positive contribution to health and wellbeing. Dover District supports 4 Local Nature Reserves

- High Meadow (LWS),
- Princes Beachland (SSSI),
- Western Heights (LWS)
- Whinless Down (LWS).

**11.22** The District contains two other Nature Reserves, Gazen Salts Nature Reserve, Sandwich and Monks Wall Nature Reserve, Sandwich both of which are managed by Sandwich Town Council.



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Figure 11.1

## Strategic Policy 16: Protecting the District's Hierarchy of Designated Environment Sites

Development that will have an adverse effect on the integrity of European designated protected sites, including the Dover to Kingsdown Cliffs SAC, the Lydden and Temple Ewell Downs SAC, the Thanet Coast and Sandwich Bay SPA, the Thanet Coast and Sandwich Bay Ramsar Site and the Sandwich Bay SAC, alone or in combination with other plans or projects, will not be permitted. Any proposal capable of affecting the designated interest features of these European Sites will be required to be subject to Habitats Regulations Assessment screening. Development within 500m of the Thanet Coast and Sandwich Bay SPA and Ramsar sites will only be permitted where a project level assessment has demonstrated in accordance with the Habitat Regulations, that any proposal will not adversely affect the integrity of these sites with specific regard to non-physical disturbance.

Development that will have an adverse effect on nationally designated sites, including the Heritage Coasts, Marine Conservation Zones, Sites of Special Scientific Interest and National Nature Reserves of the District, will not be permitted unless the benefits, in terms of other objectives including overriding public interest, clearly outweigh the impacts on the special features of the site and broader nature conservation interests and there is no alternative acceptable solution.

Development should avoid significant harm to locally identified biodiversity assets, including Local Wildlife Sites and Local Nature Reserves as well as priority and locally important habitats and protected species.

Where harm to designated sites cannot be avoided, appropriate mitigation will be required in line with a timetable to be agreed with the Local Authority. Normally any mitigation measures will be required to be delivered on-site, unless special circumstances dictate that off-site compensation is more appropriate. A financial contribution - in lieu of on-site mitigation - will only be considered in very exceptional circumstances and where it is demonstrated that the proposed mitigation is deliverable and effective.

### Green Infrastructure and Biodiversity

**11.23** Recent years have witnessed a recognition that the planning system should move towards a more integrated landscape-scale approach to green infrastructure and to improving biodiversity, alongside the conservation and enhancement of individual sites and species. To this end Biodiversity Opportunity Areas (BOAs) now form the basis of the strategic biodiversity network. As these areas offer the best opportunities for connecting fragmented habitats, improving the ability of species to move through the environment and for establishing large habitat areas and/or networks of wildlife habitats, they are priority areas of opportunity for restoration and creation of priority habitats in line with requirements of the NPPF. The Dover Local Plan 2040 will support the aims and objectives of the Kent Biodiversity Strategy (2020 – 2045) as they relate specifically to the Biodiversity Opportunity Areas (BOAs) of this District. In particular, the delivery of Kent Biodiversity Strategy targets will be focused on BOAs and the Dover District Green Infrastructure Strategy in the first instance, in order to secure maximum biodiversity benefits, and to deliver the greatest gains from habitat enhancement, restoration and re-creation, the need for which is accelerating with the climate change crisis.

**11.24** Dover District includes three BOAs. The Lower Stour Wetlands BOA contains some of Kent's most extensive water and wetland habitats. The area to the west of Dover Town lies in the Dover and Folkestone Cliffs and Downs BOA. This area encompasses a series of valleys around Dover, cliffs and cliff-top grassland,



intertidal and subtidal chalk and the steep scarp slope of the North Downs at Dover. Much of the grassland is nationally or internationally important, and there are areas of locally or nationally important woodland. Finally, a small section of the East Kent Woodlands and Downs BOA falls within the district, in the vicinity of the village of Wootton. This BOA comprises a complex of woodland and grassland habitats, including several nationally and locally important sites.

### Irreplaceable Habitats

**11.25** In addition to large scale landscape designations, ancient woodland and ancient or veteran trees represent significant elements of Green Infrastructure and are considered, for planning purposes, to be irreplaceable. Dover district has proportionately less woodland than many other districts in Kent. The district contains only 6.9% of broadleaved, mixed and yew woodland, but it constitutes 10.6% of this priority habitat type within the County with the majority consisting of small fragmented areas of ancient woodland. National guidance therefore requires that development resulting in the loss or deterioration of such irreplaceable habitats should only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and a suitable compensation strategy exists.

## Strategic Policy 17: Green Infrastructure and Biodiversity

Proposals that conserve or enhance biodiversity will be supported. All development should take opportunities to help connect and improve the wider ecological networks. The integrity of the existing network of green infrastructure, including the hierarchy of protected sites and Biodiversity Opportunity Areas should be protected and enhanced. Opportunities for the management, restoration and creation of habitats in line with the targets set out in the Kent Biodiversity Strategy for the Biodiversity Opportunity Areas (BOAs) in the district and the Dover District Green Infrastructure Strategy will be supported.

Development which would result in the loss or deterioration of irreplaceable habitats, including ancient woodland and ancient or veteran trees, will only be permitted in exceptional circumstances where the public benefit would clearly outweigh the loss or deterioration and where a suitable compensation strategy exists.

Proposals should safeguard features of nature conservation interest and should include measures to retain, conserve and enhance habitats, including internationally, nationally and locally designated sites, priority habitats, networks of ecological interest, ancient woodland, water features, hedgerows, beaches, wetland pastures and foreshores, as corridors and stepping-stones for wildlife.

### Biodiversity Net Gain

**11.26** Historically, planning policy has focused primarily on protecting important designated habitats and species. However, it is increasingly apparent that the UK's biodiversity decline is so severe that increased efforts to bring about recovery, as opposed to merely arresting loss, are essential. Since 2012 the NPPF has incorporated the principle of Biodiversity Net Gain (BNG) achieved through development, meaning that developments must fully mitigate any loss of biodiversity but then go further to provide a gain, leaving the environment in a better state than before the development. The requirement for the delivery of BNG will become mandatory once the Environment Bill currently progressing through final readings in the House of Commons is signed into law, and all developments that come forward during the Plan period, with some limited exemptions, will have to achieve BNG.

**11.27** The draft Environment Bill mandates a 10% biodiversity net gain above the ecological baseline for development sites. It also requires the creation of nature recovery networks, which will operate at district level and will guide the delivery of biodiversity net gain projects. The objective is for new development to contribute towards the delivery of net gains for biodiversity, so that the environment, across the district as a whole, is improved by the end of the plan period.

**11.28** The requirements of the Environment Bill are expected to be provided with a two-year transition period to enable local planning authorities, developers and others to prepare for the proposed requirement. Minor residential sites of fewer than 10 units are likely to be subject to longer transition arrangements or a lower BNG requirement, as well as a simplified process for calculating BNG, to be set out at a future date. As the specific requirements of the Environment Bill and associated guidance are still being produced, this policy will be subject to further revision to take account of emerging legislation and guidance and recommendations of ongoing work with partner organisations.

**11.29** It is expected that some types of development are likely to be exempt from the policy requirements. The exceptions currently identified in the Environment Bill are national infrastructure projects, sites with no biodiversity value (e.g. site covered wholly by sealed surfaces), previously developed (brownfield) sites that don't contain protected or priority habitats or face genuine viability difficulties, and permitted development and extensions. Where sites are exempt from the minimum BNG requirement, this will not mean that those sites should not still aim to maximise biodiversity enhancements to provide as much gain as possible, or at the very least avoid a net biodiversity loss.

**11.30** Planning applications will be required to include the relevant information needed to demonstrate that the proposals will meet the requirements for a minimum of 10% net gain, informed by appropriate surveys and assessments carried out by suitably qualified persons. This should include a Biodiversity Net Gain Plan and supporting reports which should provide an assessment of the likely effects of the development and changes to the ecological baseline, whether they are positive or negative.

**11.31** Net Gain will be measured using Defra's Biodiversity Metric 2.0. This metric works by placing a value on different habitats based on their distinctiveness, area, condition and contribution to an ecological network, and in doing so, allows the biodiversity value (expressed as 'biodiversity units') before and after a development takes place to be measured. In this way, the level of biodiversity gain or loss can be clearly seen by comparing the two values. At the time of writing, Defra is consulting on the metric methodology. DEFRA is, at the time of writing, producing a simplified metric for minor development proposals, as set out above, which are likely to be subject to a simplified process.

**11.32** Proposals for BNG must be acceptable to the Council in terms of design and location and should take into account local priorities set out in the Local Nature Recovery Strategy, Dover District Green Infrastructure Strategy and the Kent Environment Plan. Proposals should have appropriate delivery and funding mechanisms that are capable of being secured by condition and/or legal agreement. Monitoring of biodiversity net gain projects will be funded by the developer, with reports provided to the Council for inclusion in the Authority Monitoring report.

**11.33** The delivery of Biodiversity net gain reinforces and supports adherence to the mitigation hierarchy of avoidance, mitigation and, as a last resort, compensation, which is already well established in planning policy. Proposals for BNG will therefore be expected to demonstrate the application of the mitigation hierarchy. Loss or damage to irreplaceable habitats cannot be offset to achieve a net gain.

**11.34** It is expected that the requirement for BNG should be met on-site, within the application site boundary. If it can be clearly demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the development site boundary, the Council will consider off-site provision or a financial contribution to a biodiversity offsetting scheme.

**11.35** Offsetting must follow the principle of ecological equivalence. There must be no trading down of habitat types. Habitat types, (particularly priority habitats listed under Section 41 of the Natural Environment & Rural Communities Act, 2006), will be required to be replaced on a like for like or like for better basis.

**11.36** Offsetting schemes should be discussed and agreed in the first instance with the Council and will be expected to be strategically located for nature conservation, and be informed by local and national guidance and data sets, including The Kent Habitat Survey, the Kent Biodiversity Strategy and the Biodiversity Opportunity Area (BOA) in which the site is located, the Dover Green Infrastructure Strategy, and the Dover Nature Recovery Network. The Council will pursue net gains for biodiversity in and around BOAs and the emerging Nature Recovery Network. Projects which seek to connect fragmented habitats and improve the ability of species to move through the environment in response to predicted climate change will be supported.

**11.37** As with on-site provision, proposals for offsetting schemes will be required use the appropriate DEFRA metric to demonstrate compliance with the policy, and should comprise the full calculations of the DEFRA metric results for both development site and offset location, combined with a qualitative assessment of their ecological baselines. The evidence will show how the offset is strategically located to offer the best opportunities for habitat creation, restoration and connectivity to other areas of habitat.

**11.38** For development schemes, which are unable to provide ecologically meaningful net gains on site, the Council intends to provide an alternative mechanism for developers to achieve biodiversity net gain. This could include setting up one or more habitat banks within the district. They are areas of land, secured and managed appropriately for nature conservation, to offset the impacts of multiple developments. The developer fulfills their duty by making a financial contribution to the habitat bank.

**11.39** Local Nature Recovery Strategies will be made available and a Dover District Biodiversity Net Gain Strategy will be produced as SPD to the Local Plan. In advance of this being produced, reference should be made to the latest guidance, Biodiversity Net Gain – Good Practice principles for development, a practical guide (CIEEM, CIRIA, IEMA, 2019) and and British Standard BS42020 Biodiversity - Code of Practice for Planning and Development, or subsequent revisions.

## DM Policy 38: Biodiversity Net Gain

Development proposals must provide a minimum of 10% biodiversity net gain. Proposals for biodiversity net gain must:

- a) be provided as part of the development within the development site boundary. Only if it can be demonstrated that ecologically meaningful biodiversity net gain cannot be achieved within the site boundary will the Council consider off-site alternatives or financial contributions towards a biodiversity off-setting scheme within the District;
- b) be provided above the agreed pre-development ecological baseline of the site, for both area and linear habitats;
- c) focus on local priorities and be informed by the Local Nature Recovery Strategy, Dover District Green Infrastructure Strategy and the Kent Biodiversity Strategy;
- d) be secured for a minimum of 30 years,
- e) be informed by a comprehensive understanding of habitats and species associated with the site, to include survey and assessment work carried out by suitably qualified professionals and relevant information from the Kent and Medway Biological Records Centre; and
- f) follow the mitigation hierarchy and demonstrate by appropriate project design, evidence of adequate avoidance and mitigation measures. Where harm to wildlife habitats cannot be avoided or adequately mitigated, appropriate compensation measures will be sought. Biodiversity net gain must be in addition to any form of compensation.

Planning applications must be supported by a Biodiversity Net Gain Plan and supporting reports with information to demonstrate how 10% biodiversity net gain will be achieved, including:

- g) Use of the most up-to-date DEFRA metric calculation, including breakdown of stages;
- h) an assessment of the likely effects of the development and changes to the ecological baseline;
- i) details of the ecological assessments to include both qualitative and quantitative evidence;
- j) details of the design and location of the proposals; and
- k) details of how the net gain proposals will be implemented, managed and maintained.

Biodiversity net gain proposals will be secured by condition and/or legal agreement. This will include a requirement to cover the Council's costs associated with the long-term monitoring of the biodiversity net gain proposals.

Applications for change of use in order to create biodiversity sites in appropriate locations, including biodiversity off-setting sites and sites within Local Nature Recovery Strategies will be supported.

## Landscape Character

**11.40** The countryside and coastal landscapes of Dover District are one of its greatest assets. From the low-lying and marshland areas in the northern parts of the district to the extensive chalk grasslands of the interior and the iconic white cliffs along its southern and eastern coastlines, the landscapes provide a livelihood for the agricultural and tourism sectors, an attractive setting for settlements and an important recreational resource for residents and visitors. Approximately 22% of the District falls within the Kent Downs AONB, a nationally designated and protected landscape which the Council has a statutory duty, under the Countryside and Rights of Way Act, to conserve and enhance.

**11.41** Dover District falls within the North Kent Plain and the North Downs National Character Areas as defined by Natural England. The Dover Landscape Character Assessment 2020 which accompanies this Plan provides detailed assessments at a district level. It defines eight generic landscape character types (LCTs) in the district, each representing a distinct identity and common geology, topography, land use and cultural pattern. The LCTs are subdivided into local landscape character areas (LCAs), which are discrete geographic areas that possess the characteristics described for the landscape type but have a recognisable local identity. The classification identifies 17 LCAs and defines issues of landscape management and development management which should be delivered over the plan period.

<b>LCT A: River Valleys and Marshes</b>	
A1	Little Stour Marshes
A2	Ash Levels
A3	Little Stour and Wingham River
<b>LCT B: Developed River Valley</b>	
B1	Great Stour – Sandwich Corridor
<b>LCT C: Coastal Marshes and Dunes</b>	
C1	Sandwich Bay
C2	Lydden Valley
<b>LCT D: Horticultural Belt</b>	
D1	Preston
D2	Ash
D3	Staple Farmlands
<b>LCT E: Open Arable Chalk Farmland with Parkland</b>	
E1	Shepherdswell Aylesham Parklands
E2	Whitfield Parkland
<b>LCT F: Open Arable Chalk Farmland with Woodland</b>	
F1	Chillenden
F2	Northbourne
F3	Ripple
<b>LCT G: Chalk Hills</b>	
G1	Lydden Hills
G2	Guston Hills
<b>LCT H: Defensive Hills</b>	
H1	Richborough Bluff

Table 11.1

**11.42** Given the quality and importance of its natural landscape to this district, including its role in the wellbeing of residents and the local economy, it is important that all development, where acceptable in principle, should be designed in a way that complements the LCA in which it is located, works to deliver the landscape and development management guidance of the Dover Landscape Character Assessment 2020 and does not harmfully effect such a landscape setting. In doing so, particular attention should be paid to:

- Landform, topography and geology
- Natural drainage patterns
- Pattern and composition of hedgerows, woodlands and field boundaries
- Wildlife habitats and networks
- Settlement patterns
- Locally distinctive architecture

### The Kent Downs AONB

**11.43** An AONB is designated for the high scenic quality of its landscape, its importance for rare species and for tranquillity. AONBs embody a clear sense of place and are home to sites of historical, wildlife or architectural conservation interest. Proposals coming forward over the plan period within the Kent Downs AONB should, alongside the guidance listed above, have regard to the primary purpose of conserving and enhancing the natural beauty of this landscape and with the principles of the Kent Downs AONB Management Plan 2020 -2025 and its successors.

**11.44** The setting of the AONB comprises land adjacent to or within close proximity of its boundary; land which is visible from the AONB and from which the AONB can be seen. In some cases the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. The setting may be wider in certain circumstances, for example when affected by features such as noise and light. Within the setting of the AONBs, priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife and geological features, while recognising that landscape considerations carry less weight than within the AONB boundary.

### Regionally Important Geological Sites

**11.45** Regionally Important Geological Sites are geological Earth Science sites of particular importance as an educational, research, historical or recreational resource. Identified by the Geo-Conservation Kent Group, there are three such Sites located in Dover District, all legacies of the East Kent coalfield; Betteshanger Colliery Tip, Tilmanstone Colliery Tip and Snowdown Colliery Tip. Betteshanger tip has now been landscaped to create Betteshanger Park.

## DM Policy 39: Landscape Character

Proposals which demonstrate particular regard to the Landscape Character Area, as defined by the Dover District Landscape Character Assessment 2020, in which they are located and in particular to the following landscape characteristics, will be supported:

- i Landform, topography, geology and natural patterns of drainage;
- ii The pattern and composition of trees and woodlands;
- iii The type and composition of wildlife habitats;
- iv The pattern and composition of field boundaries;
- v The pattern and distribution of settlements, roads and footpaths;
- vi The presence and pattern of historic landscape features;
- vii The setting, scale, layout, design and detailing of vernacular buildings and other traditional man-made features.

In addition, all proposals within the Kent Downs AONB should have regard to the purpose of conserving and enhancing the natural beauty of the Kent Downs AONB. All proposals within, or affecting the setting of, the AONB will be supported where:

- The location, form, scale, materials and design would conserve and where appropriate enhance or restore the special character of the landscape;
- The development would enhance the special qualities, distinctive character and tranquillity of the AONB; and
- The development has had regard to the AONB Management Plan and any associated guidance.

Major development proposals within the AONBs will only be permitted in exceptional circumstances and where it is demonstrated they are in the public interest.

## Thanet Coast and Sandwich Bay SPA and RAMSAR Mitigation Strategy

**11.46** The Thanet Coast and Sandwich Bay Special Protection Area (SPA) and Ramsar site is used by large numbers of migratory birds. Of particular importance are over-wintering Turnstones and European Golden Plovers. Surveys have revealed a significant decline in the populations of these birds over recent decades, which are protected under international law. Ongoing HRA work has concluded that wintering bird surveys will be required to be submitted as part of planning applications for site allocations identified as having a high or moderate suitability for qualifying bird species. This requirement is reflected in the Site Allocations policy of the Plan. Evidence shows that recreational activity, particularly dog walking, causes harmful disturbance to such bird species. Recreational activity is very likely to increase as a result of the increase in housing numbers that this Local Plan will deliver, and it is the impact of such additional activity that a mitigation strategy will need to address.

### The Need for Mitigation

**11.47** Much of this attractive coastal area is accessible and popular for walking and cycling. It is apparent from ongoing visitor disturbance studies at Pegwell Bay (Thanet District) and Sandwich Bay (Dover District) that such recreational activities are having an adverse impact on the species for which the SPA has been designated. The major concern is that of disturbance to over-wintering birds, particularly their ability to feed which, consequently, has an adverse effect on their breeding performance. The impact of recreational

pressures here cannot therefore, when taken in combination, be ruled insignificant having regard to Regulation 61 of the Conservation of Habitats and Species Regulations 2010 and it is concluded that they could give rise to significant impacts on the Thanet Coast and Sandwich Bay SPA.

**11.48** The Thanet Coast and Sandwich Bay SPA is divided by the estuary of the River Stour. This allows for a focused approach to a mitigation strategy. It is considered, on the existing evidence, that development in Dover is unlikely to have a significant impact on Pegwell Bay but may impact on the Sandwich Bay element of the SPA. In 2012 Dover District Council adopted a mitigation strategy to monitor potential impacts on the qualifying bird species of the Thanet Coast and Sandwich Bay SPA arising from development in the district, and to enable, if necessary, funding to be drawn down to support wardening at Sandwich Bay for a period up to 10 years. This mitigation strategy runs to 2022. As part of the preparation of a new Local Plan for the District, a new Habitat Regulations Assessment and a revised mitigation strategy are being prepared. As part of the evidence base for these reports, monitoring is being undertaken. When the results of such monitoring are finalised, the implementation of a new mitigation strategy to take effect prior to 2022 may be required.

**11.49** The current mitigation strategy applies a tariff across the whole of Dover District, on developments of greater than 15 dwellings, in order to address the mitigation of the cumulative 'in combination' impact of such additional housing on the qualifying bird species. Work on the revision of this strategy has sought to evaluate whether a whole district approach remains appropriate, or whether a 'Zone of Influence' approach is more applicable or whether another approach is required. A Zone of Influence is the geographical area from which it is considered that an impact on the interest of a designated SPA is most likely to derive. A Zone of Influence approach has been adopted by neighbouring Thanet and Canterbury districts in respect of this SPA, although in the case of Thanet District the zone of influence covers the entire district.

**11.50** To assess the harmful impact of recreational pressures visitor surveys are most commonly used. These identify where people who visit the site live, in order to define a Zone of Influence. Generally, a core visitor area can be identified, albeit with some outliers of visitors from further afield. A Zone of Influence approach should then take into account such visitor patterns, as well as physical features of the site, current housing proposals and allocations and other relevant local features. A common approach to determine the extent of a Zone is to base the Zone on the area from which 75% of visitors originate.

**11.51** Survey work to analyse the home destinations from which visitors travel to Sandwich Bay has been undertaken as part of the evidence base for the new Local Plan. This shows a Zone of Influence, based on the approach outlined above, of approximately 9km. A tariff schedule to deliver mitigation and monitoring contributions from new development within a Zone of Influence of 9km from the Thanet Coast and Sandwich Bay SPA is therefore considered appropriate. However, given the large proportion of proposed allocations in this Plan for Dover District which would lie just beyond a 9km Zone of Influence, and the high number of visitors shown to originate from within the district as a whole, it cannot be ruled out that development across the district will not also lead to an increase in visitors to Sandwich Bay. As a result, DM Policy 40 also proposes a tariff regime to collect monitoring contributions in line with a revised Strategic Access Management and Monitoring (SAMM) Plan from new development across the district.

**11.52** The current tariff is applied across the whole of Dover District to developments of greater than 15 dwellings. An updated SAMM, which will establish the mitigation and monitoring measures for which these tariffs will be raised, as well as the details of the tariff structure itself, will be prepared as part of the evidence base for the Regulation 19 Draft Local Plan. Whilst a number of planning authorities have decided to apply a SAMM tariff to all new residential developments, it is proposed that a threshold of 10 or more dwellings is set at this stage in the Plan preparation, in line with the other S106 requirements of the Regulation 18 Dover Local Plan, and as a pragmatic transition from the current threshold to a potentially wider coverage. In such



a scenario the cost of the mitigation necessary for development under 10 units would be met from those developments above this threshold. The updated SAMM will conclude on the appropriate threshold to be set for the collection of the tariff.

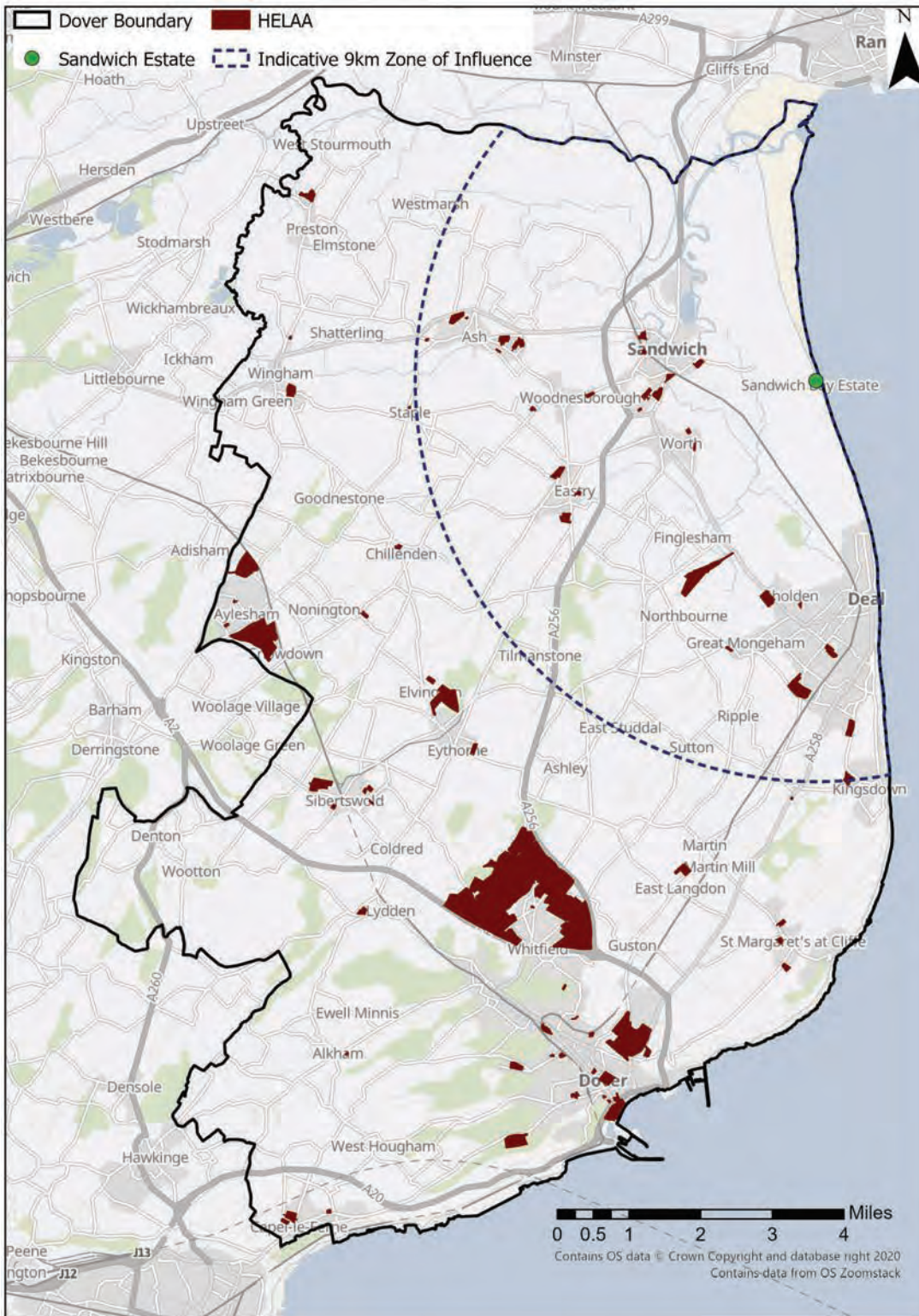


Figure 11.2

## DM Policy 40: Thanet Coast and Sandwich Bay SPA Mitigation Strategy

All proposals for new residential development of greater than 10 dwellings will be required to:

- a) Comply with the Strategic Access Management and Monitoring (SAMM) Plan for the Thanet Coast and Sandwich Bay SPA in order to mitigate against the in-combination effects of new development, through the pathway of recreational pressure, on the Thanet Coast and Sandwich Bay SPA; and
- b) make a financial contribution to provide such monitoring measures as will be set out in the SAMM Plan.

In addition, all proposals for new residential development within a 9km Zone of Influence radius of the SPA will also be required to make a financial contribution towards mitigation measures.

Such contributions will be set by a tariff system to be set out in the Local Plan and reviewed every 10 years, or sooner if monitoring reveals issues which are not being addressed by the mitigation measures. Contributions will be based on a tariff system and collected by the S106 agreement mechanism.

Developments for other uses that would increase recreational activity causing disturbance to qualifying species, including but not limited to holiday accommodation, hotels and leisure uses, will be assessed on a case by case basis under the Habitat Regulations and may be required to make full or partial contributions towards the SAMM Plan if appropriate.

### Air Quality

**11.53** The main sources of pollutant emissions within Dover are linked to port activities, primarily regular cross-channel shipping, and large volumes of road traffic as a result of the associated transport of goods along the A2 and A20 entering and leaving the town and the port. There are currently two Air Quality Management Areas (AQMAs) declared in Dover District, due to exceedance of the annual mean Air Quality Strategy (AQS) objective for NO<sub>2</sub>; a situation caused primarily by road traffic emissions. These AQMAs are located along a stretch of the A20 at Dover (declared in 2004, amended in 2007 and 2009) and at the junction of the High Street and Landwell in Dover town centre (declared in 2007).

**11.54** A new Air Quality Action Plan (AQAP) is currently under development for Dover District and will be finalised in 2021 when uncertainty over whether the UK will be leaving the European Union with a deal or without (with Dover likely to be significantly impacted by such decisions), together with the nature of the deal, and its associated border administration, will be clarified. A dispersion modelling assessment along the main roads in Dover, including both AQMAs will be undertaken as part of this Action Plan, utilising the latest monitoring data, alongside an updated source apportionment study to identify the extent to which different key sources are contributing to air quality exceedances in the area. The outcomes of this assessment will help ascertain whether AQMA adjustments will be required.

**11.55** As part of the evidence base for both the Local Plan and the revised Dover AQAP, an Air Quality Assessment has been undertaken. The Assessment examined the exposure of existing residential and ecological receptors, alongside new local plan originated development receptors, to concentrations of Nitrogen Dioxide (NO<sub>2</sub>), Particulate Matter (PM<sub>10</sub>), CO<sub>2</sub> and Nitrogen (as NO<sub>x</sub>). This work concluded that the implementation of the Local Plan is not predicted to significantly impact air quality or increase the number of sensitive receptors which are exposed to poor air quality, provided recommended mitigation measures

are followed. In addition to the policy below, these mitigation measures are addressed by policies in the Climate Change Chapter of this Plan, specifically Strategic Policy 12 and DM Policies DM Policy 4 and DM Policy 9.

## DM Policy 41: Air Quality

All development should be designed to encourage an increase in the use of sustainable modes of transport. In addition, major development proposals will be required to demonstrate a shift to the use of sustainable low emission transport in order to minimise the impact of vehicle emissions on air quality.

Development proposals that might lead to a significant deterioration in air quality or national air quality objectives being exceeded, either alone, or in combination with other committed development, will be required to submit an Air Quality Assessment, carried out in accordance with the relevant guidance, to be agreed with the Local Planning Authority as part of planning applications. Such an Assessment should address

- a) The cumulative effect of further emissions arising from the proposals; and,
- b) The proposed mitigation measures, including appropriate design and offsetting measures, which would prevent National Air Quality Objectives being exceeded or would reduce the extent of any air quality deterioration.

Proposals which will result in National Air Quality Objectives being exceeded will not be permitted.

## Water Quality and Supply

### Water Supply

**11.56** Dover District is underlain by chalk, which provides groundwater for the public water supply. As a result of such permeable geology, there are few main rivers in the District aside from the River Stour and the River Dour. The Stour, in the north, drains much of East Kent. The River Stour historically, and currently, is of poorer quality compared to the Dour, due to high nutrient concentrations, particularly nitrates and phosphates, which reduce biodiversity value. However, despite this, the catchment area has great nature conservation interest, which includes the last valley fen in South East England, together with some 280 km of dykes and drainage ditches, draining approximately 10% of the district. The River Dour, located in the south of the District, has a local catchment, draining the dry chalk valleys in the vicinity of Dover town and is one of only two pure chalk streams in Kent. The River Dour catchment has good water quality and is important ecologically as, being an isolated catchment, it provides a safe haven for native species including wild brown trout. Being an urban river, fed predominantly through groundwater, the river is susceptible to a mix of fluvial and pluvial flooding in periods of high rainfall.

**11.57** The Kent Environment Strategy identifies Kent as one of the driest regions in England and Wales. At the same time, Kent's household water use is above the national average (154 litres per person per day compared with 141 litres nationally). Kent's water resources are therefore under particular and continued pressure, requiring careful management and planning. Dover falls partly within the Dour Water Resource Zone (Affinity Water) and the Thanet Water Resource Zone (Southern Water), both of which will experience a shortfall in demand up to 2031. Drinking water is supplied wholly by groundwater sources from the underlying chalk. Dover is located in the Environment Agency's Stour Catchment Abstraction Management Strategy, which identifies all the groundwater sources as over-abstracted.

## Groundwater Source Protection Zones

**11.58** The Environment Agency has defined Source Protection Zones (SPZs) for groundwater sources such as wells, boreholes and springs used for public drinking water supply. These zones show the risk of contamination from any activities that might cause pollution in the area. The closer the activity, the greater the risk. A number of Source Protection Zones 2 and 3 are located within Dover district, protecting the district's rivers and aquifers from pollution. The majority of the zones are concentrated in the southern third of the District, with a significant concentration to the north-west of Dover. In order to ensure that as much rainfall as possible returns to the ground to re-charge groundwater sources, to control rainwater runoff at source and alleviate pressures on sewer systems and treatment plants, the Local Plan will be promoting sustainable urban drainage systems (SUDS) which aim to mimic natural drainage as far as possible. These are, however, only acceptable in Source Protection Zones when it can be demonstrated that there will be no environmental risks to water quality.

## Water Quality

**11.59** The Dover District Water Cycle Study found that while the River Dour catchment has good water quality, the lower reaches of the River Stour have poor water quality, both in recent years and historically.

**11.60** In July 2020 Natural England issued advice to local authorities for development proposals with the potential to increase nutrient impacts to nationally and internationally important wildlife sites within the Stour Valley catchment. The Stodmarsh wetland sites rely on a high quality of water and stable water levels, in particular the lake habitats. Some of the lakes are currently impacted by an excess of both Nitrogen and Phosphorus and are not achieving the required standard to support their favourable condition. This is because both Nitrogen and Phosphorous can have a range of negative impacts, including promoting algae growth, which can lead to reduced light and oxygen available for aquatic plants and animals and affect those birds that feed on them. Increased nutrients can also promote changes in structure which make it unsuitable for wetland species, including the main SAC feature. Natural England's advice is that a likely significant effect on the Stodmarsh designated sites from development that increases these nutrients cannot be ruled out, on objective evidence, at this stage.

**11.61** At the time of writing, the Council is taking expert hydrological advice to determine whether or not areas of Dover District should be included within this guidance, as the catchments that lie with Dover District are upstream of the Stodmarsh Lakes and there may therefore not be a hydrological connection. However, in the absence of evidence to the contrary, at the current time, all new housing development proposals, will therefore need to consider, via an appropriate assessment, the impact of adding to the existing water quality target failures in the Stodmarsh European sites.

**11.62** Negative impacts upon water quality, could occur either directly, through pollution of surface or ground water or indirectly through the treatment of waste water. In line with the objectives of the Water Framework Directive, development must not result in a water body failing to meet the class limits for the status class listed in the current South East River Basin Management Plan. Development schemes affecting the river will be expected to undertake a Water Framework Directive Assessment, setting out the potential impact of the new development.

## DM Policy 42: Water Supply and Quality

All new residential development must achieve as a minimum the optional requirement set through Building Regulations for water efficiency that requires an estimated water use of no more than 110 litres per person per day.

Major proposals for new development must be able to demonstrate that there are, or will be, adequate water supply and wastewater treatment facilities in place to serve the whole development, or where development is being carried out in phases, the whole of the phase for which approval is being sought. Improvements in these facilities, the timing of their provision and funding sources will be key to the delivery of development.

All development proposals must provide a connection to the sewerage system at the nearest point of adequate capacity wherever feasible, as advised by the service provider, and ensure future access to the existing sewerage systems for maintenance and upsizing purposes. Schemes that would be likely to result in a reduction in the quality or quantity of groundwater resources will not be permitted.

Within Groundwater Source Protection Zones, as shown on the Proposals Map, the following will not be permitted in Zones 1 and 2 unless adequate safeguards against possible contamination are provided:

- i Septic tanks, storage tanks containing hydrocarbons or any chemicals, or underground storage tanks;
- ii Proposals for development which may include activities which would pose a high risk of contamination unless surface water, foul or treated sewage effluent, or trade effluent can be directed out of the source protection zone;
- iii Proposals for the manufacture and use of organic chemicals, particularly chlorinated solvents;
- iv Oil pipelines;
- v Storm water overflows;
- vi Activities which involve the disposal of liquid waste to land; and
- vii Sustainable urban drainage systems.

New graveyards will not be permitted in Zone 1. Farm waste, storage areas, new foul or combined sewerage systems will not be permitted in Zone 1 unless adequate safeguards are provided.

The Council will support, in principle, infrastructure proposals designed to increase water supply and wastewater treatment capacity subject to there being no significant adverse environmental impacts and the minimisation of those that may remain.

### The River Dour

**11.63** The River Dour is an important feature in the town of Dover. Public access to the river however is fragmented and many existing developments have turned their frontages away from it, rather than making it an integral feature. The river poses flood risk issues which need to be addressed in development proposals. Water quality is also an issue for this river, with historic culverting over the river having a harmful effect on water quality and wildlife. As a result, there is a need to give more prominence to the river and allow it to fulfil its potential to help enhance the distinctive environment of the town Dover.

**11.64** To deliver on such an objective, opportunities to link up fragmented sections of the existing riverside walk for walking and cycling and to promote increased usage will be encouraged as a means of achieving, in the longer-term, a publicly accessible spinal route through the town which follows the river. In addition, development proposals that physically relate to the river will be encouraged to incorporate an active river frontage whilst protecting and enhancing water quality and wildlife interest.

### **DM Policy 43: The River Dour**

Proposals within the river corridor of the River Dour which do not have adverse impacts upon water quality, river flow, or riparian habitats and species will be permitted. Development proposals that affect the setting of the River Dour should, wherever possible, actively enhance the natural functioning of the river, provide adequate natural buffers to protect against polluting runoff, ensure that they create a connected active river frontage, improve public access and enhance wildlife interest.



12

Historic environment

**12.1** This chapter sets out the Council's strategy for the historic environment and covers:

- What the key issues are in relation to the historic environment for the the District;
- How these issues could be addressed through planning policy and what our preferred approach is;
- Draft policies and supporting text for:
  - Protecting the Districts historic environment;
  - Designated and non-designated heritage assets;
  - Conservation Areas;
  - Archaeology;
  - Dover Western Heights Fortifications Scheduled Monument and Conservation Area; and
  - Historic Parks and Gardens.

### What are the key issues to consider?

**12.2** From initial consultation, and the evidence we have collected so far, we have identified the following key issues in respect to the historic environment:

- To promote the conservation and, where appropriate, the restoration and enhancement of the District's heritage assets, in order to protect their significance and to ensure that they can be best appreciated and enjoyed by future generations.
- To encourage the role that the District's historic environment and heritage assets can play in the local economy and in enabling and informing new development to secure better outcomes from sustainable growth.
- To reconcile the need for energy efficient and low carbon building technologies and design, with the need to ensure that the historic and architectural character of the Districts heritage assets is sustained.
- To improve access to, understanding of, and enjoyment of the Districts historic environment, including the securing of a sustainable future for the Dover Western Heights Fortifications through the unlocking of the value of its military heritage and its unique setting and by widening its appeal as a strategic location for inward investment.

### How could these be addressed through planning policy and what is our preferred approach?

**12.3** The current planning policy framework for the District includes only one historic environment policy (for applications affecting Historic Parks and Gardens, Policy DM19), and a strategic site policy for Dover Western Heights (Policy LA11). Such an approach is at odds with the NPPF which requires local planning authorities to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. A strategic policy for protecting the rich historic environment of the district is therefore considered to be essential for the Local Plan 2040.

**12.4** In considering the delivery of such an overarching strategy, policy options include separate policies for different categories of heritage assets; namely listed buildings, conservation areas, archaeological remains and scheduled ancient monuments, historic parks and gardens and protected wreck sites or one generic policy for all heritage assets. Given the exceptional wealth and diversity of the heritage assets that Dover District enjoys, policies for different categories of heritage assets is the preferred approach, with the exception of including a standalone policy for the one protected wreck site in the district, which it was felt would be adequately covered by both the strategic policy and a policy for designated heritage assets.



**12.5** As this district is particularly rich in heritage assets, a number of them iconic, the option of having site specific policies for significant heritage assets was also considered. Of the principal assets, there is a substantial evidence base for the Dover Western Heights fortifications and therefore a policy for this important site is considered appropriate.

**12.6** Finally, following the Council's declaration of a climate change emergency and commitment to the delivery of a carbon neutral district by 2050, it is considered important that the Plan include clear policy to guide proposals for energy efficiency improvements to heritage assets in order to ensure that their heritage significance is sufficiently protected. Current advice from Historic England, which requires clear adoption of a 'whole building' approach, forms the basis of the preferred approach. It is considered that this best ensures that proposals are based on an understanding of the methods of construction, fabric and history of the individual building or assets, in order to deliver solutions that sustain heritage significance, save energy and maintain a healthy indoor environment for the occupiers. There is the option of a standalone policy for such retrofitting proposals or to include policy on this issue within the policy on designated and non-designated heritage assets. The preferred approach is for the latter, given that the majority of such proposals that will come forward will do so as applications for alterations to listed buildings or to non-designated heritage assets in conservation areas.

## Draft policies and supporting text

**12.7** Our preferred policy approach to conserving and enhancing the historic environment in the District over the Plan period, and the justification for this, is set out below:

### Protecting the District's Historic Environment

**12.8** The significant archaeological and historical heritage of Dover District is an irreplaceable resource which has played a major role in shaping the District's development and identity and which offers outstanding opportunities to enhance the environment and economy of the District over the plan period. Heritage assets will therefore be protected and conserved in a manner appropriate to their significance.

**12.9** The district is home to 1,926 listed buildings, 57 Conservation Areas, 50 Scheduled Monuments, 6 Historic Parks and Gardens and one protected wreck site in addition to a rich archaeological resource. Historic England's Heritage at Risk Register (2019) lists 13 heritage assets at risk in this district. Non-designated assets also play an important role, contributing to the character and distinctiveness of the District and providing a focus for conservation and access projects, interpretation, education and research. The Kent Historic Environment Record records more than 12,000 entries for Dover District.

### The Dover Heritage Strategy

**12.10** The Dover District Heritage Strategy 2013 was developed and produced by the Heritage Conservation Group of Kent County Council for Dover District Council and English Heritage in order to promote a greater understanding of the heritage assets of the District. This Heritage Strategy is a substantial and comprehensive body of work and as such serves as the principal evidence base for the historic environment sections of the Local Plan. It was updated in May 2020 in order to take into account the revisions in 2019 to the NPPF. The Strategy divides the heritage assets into a number of themes with each theme study including a written description of the principal heritage assets, a list of key heritage assets and a statement of significance for that theme. Also highlighted are any significance vulnerabilities or opportunities connected with either the theme as a whole or to specific assets within that theme.

## Local Listing

**12.11** Local lists play an important role in celebrating non-designated heritage that is particularly valued by communities. The process of preparing a local heritage list allows local people, in partnership with the Council, to identify local heritage that they would wish to see recognised and protected. Such local lists once agreed by the local planning authority as having heritage significance, will merit consideration in planning matters, with the planning authority taking a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset itself. Dover does not currently have a Local List. The council will therefore produce guidance which will set out a recommended methodology based on Historic England's Guiding Principles for Local Heritage Listing, in order to support local groups who wish to prepare a Local Heritage List.

### **Strategic Policy 18: Protecting the District's Historic Environment**

The heritage assets of the District are an irreplaceable resource and should therefore be conserved and enhanced in a manner appropriate to their significance. The Council will work with partners to ensure that the heritage of the District can positively contribute to the character, environment and economy of the District and the quality of life of existing and future generations of residents and visitors.

## Designated and Non-designated Heritage Assets

**12.12** Designated heritage assets in Dover District comprise Scheduled Monuments, Listed Buildings, a Protected Wreck Site, Registered Park and Gardens, and Conservation Areas as designated under the relevant legislation. Non-designated heritage assets include buildings, monuments, sites, places, areas or landscapes which have a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designation as heritage assets. Specifically, these include sites that have been identified in the Kent Historic Environment Record, the Dover District Heritage Strategy, in a Local or Neighbourhood Plan or in Conservation Area Appraisals and Reviews. In some cases, non-designated heritage assets will be identified as part of the decision-making process on planning applications, for example, following archaeological investigations.

**12.13** Proposed development affecting a heritage asset is assessed against the impact that such works will have on its significance. Development may have no impact on the significance of the listed building or conservation area, for example, or it may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified including from development within its setting, it will be categorised as either less than substantial harm or substantial harm, the latter includes total loss. It is the degree of harm to the asset's significance, rather than the scale of the development, that will then be assessed when determining the application. In such assessment great weight will be given to the asset's conservation; the more important the asset, the greater the weight will be. The heritage assets of Dover District are one of its richest resources and therefore any harm to designated heritage assets will require clear and convincing justification, while substantial harm to heritage assets in the district should be exceptional, and in the case of scheduled monuments, protected wreck sites, grade I and II\* listed buildings and registered parks and gardens wholly exceptional.

### **Energy efficiency improvements to heritage assets**

**12.14** Energy efficiency improvements to heritage assets can impact upon their heritage significance in a variety of ways. In such cases, the question of what is and what is not an acceptable change will depend on the measures proposed and their impact on a building's significance. There are many measures that can

be applied to traditionally built buildings to improve energy performance while protecting their heritage significance. However, because of the variability in traditional designs and construction methods, it is important that a one size fits all approach is not pursued and instead that energy improvement proposals demonstrate a 'whole building' approach, one that is based on an understanding of the construction and history of the building for example, in order to find a solution that sustains heritage significance, saves energy, and maintains a healthy indoor environment. Houses of traditional construction, for example, do not perform in the same way as their modern counterparts. Most modern buildings depend on impermeable barriers to control the movement of moisture and air through the building fabric. In contrast, traditional forms of building construction take up moisture from their surroundings and release it according to ambient conditions. They also tend to heat up and cool down more slowly.

**12.15** For proposals which include the installation of energy efficiency measures and where planning permission and/or listed building consent are required, the nature and the scope of proposed measures will therefore be assessed both against their suitability for the particular property and against the risk of harming the significance of the heritage asset.

### Heritage Statements

**12.16** All applications affecting heritage assets are required to submit a Heritage Statement which should include an assessment of the significance of that asset. Significance in this context is defined as the value of the asset to this and future generations because of its heritage interest. Such interest may be archaeological, architectural, artistic or historic. In doing so it is important to note that significance derives not only from a heritage asset's physical presence, but also from its setting; the surroundings in which a heritage asset is experienced. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

**12.17** Heritage Statements for applications in this district should make reference to the extensive evidence resource that Dover District Heritage Strategy provides, including categorising the asset against one or more the 13 Themes set out in the Strategy. To assist applicants with this requirement the Council will provide written guidance to accompany this Plan on what a Heritage Statement should comprise and will establish a clear methodology for checking proposals against the Heritage Strategy themes.

## DM Policy 44: Designated and Non-designated Heritage Assets

Proposals which conserve or enhance the heritage assets of the District, sustaining and enhancing their significance and making a positive contribution to local character and distinctiveness will be supported. In particular, proposals that bring redundant or under-used buildings and areas, including those on the Heritage at Risk Register, into appropriate and viable use consistent with their conservation, will be encouraged.

Development will not be permitted where it will cause total loss or substantial harm to the significance of a designated heritage asset or its setting, unless it can be demonstrated that substantial public benefits will be delivered that outweigh the harm or loss caused, or

- where the nature of the heritage asset prevents all reasonable or viable uses of the site, and
- no viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation through grant funding is not possible, and
- the harm to or loss of the asset is outweighed by the benefits of bringing the site back into use.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, or where a non-designated heritage asset is likely to be impacted, harm will be weighed against the public benefits of the proposals, including, where appropriate, securing the optimum viable use of the heritage asset.

For development that involves the installation of energy efficiency improvements to heritage assets, applications should also demonstrate a whole building approach, including an assessment of the suitability of the proposed measures for the particular property, its construction and materials, in addition to the impact on its heritage significance.

All applications with potential to affect a heritage asset or its setting must be supported by a Heritage Statement, which should draw on the evidence contained in the Dover District Heritage Strategy, including referencing the heritage themes of the Strategy that apply. Such a Statement should include an assessment of the asset's historic, architectural or archaeological significance and the likely impact of the proposals on its significance, proportionate to the importance of the asset.

## Conservation Areas

**12.18** Conservation Areas are designated in law for their "special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance". There are 57 Conservation Areas in Dover District, including the very first Conservation Area to be designated in Kent, at Middle Street in Deal. The Dover Heritage Strategy concludes that the Conservation Areas of Dover District, covering amongst other areas the historically important towns of Sandwich, Dover and Deal, the substantial fortifications at Dover Western Heights, the Castles of Dover, Deal and Walmer, and the historic cores of many rural villages and estates across the District, represent an asset of outstanding significance.

**12.19** There are currently 7 Conservation Area Appraisals in operation in the district. A programme of preparing Conservation Area Appraisals, to increase the numbers of Conservation Areas for which Conservation Area Appraisals have been completed, will therefore continue over the Plan period. Four Conservation Areas are currently afforded additional protection in part through Article 4 (2) Directions – Kingsdown, Deal Middle Street, Deal North Street and Sandwich Walled Town.

## DM Policy 45: Conservation Areas

Applications for development or redevelopment in Conservation Areas will be supported provided that such proposals preserve or enhance the special architectural or historic character and appearance of the Area and its setting. Applications should be guided by and make reference to the appropriate Conservation Area Appraisal where one is in operation.

All new development and alterations in Conservation Areas should:

- Respect the plan form, architectural features, materials, height, massing, building lines, roofscapes, scale, relationships between buildings and the spaces between them of the Area; and
- Retain trees, open spaces, walls, fences and other features where they contribute positively to the character and appearance of the Area; and
- Be appropriate in land use to the character, appearance and historic function of the Area; and
- Not generate levels of traffic, parking or other environmental problems which would result in unacceptable harm to the character, appearance or significance of the Area; and
- Not prejudice important views into or out of the Area.

## Archaeology

**12.20** As the closest point to the continent, archaeological evidence demonstrates that Dover District has been central to the transmission of ideas, goods and people between continental Europe and England since at least the Bronze Age. This has led to a rich and diverse archaeological record that includes numerous archaeological sites of national significance and both designated and non-designated heritage assets. Non-designated archaeological sites are often less visible than designated sites but nonetheless play an important role, contributing to the character and distinctiveness of the District and providing a focus for conservation and access projects, interpretation, education and research.

**12.21** A number of the archaeological assets of the District can be considered to be iconic, including Dover Castle itself, Richborough Castle, the Roman Pharos in Dover Castle and the immense fortifications of the Western Heights. Others are less well known but nonetheless play an important role in the contributing to the historic character of the District. Many of the district's archaeological remains are also remarkably well preserved, particularly in former marshy areas of the northern part of the District and along the River Dour.

**12.22** The urban archaeology of the District is particularly rich. The archaeological discoveries at Dover have recently been modelled to form an Urban Archaeological Database by Kent County Council, one of only 30 such databases across the country, following grant funding from Historic England and the District Council. This analysis provides a record and maps of all the individual pieces of archaeological work which have taken place in the urban area, along with a summary of all the monuments which have been identified. This work will provide an excellent resource for applicants, reducing the research required for individual desk-based site assessments, and will form the basis of a Dover Town Archaeology Supplementary Planning Document, to be brought forward early in the Plan period. This will set the story of the development of the town and is likely to set out Areas of Archaeological Significance and Primary and Secondary Archaeological Character Zones, as defined by their predominant archaeological character, with such Areas being identified on an interactive map.

**12.23** Individual archaeological sites have their own particular vulnerabilities but the archaeological resource of the district is in general vulnerable to natural processes such as erosion and climate change, activities such as ploughing, construction and development, including utilities, services and infrastructure works, change of use and general neglect. All of these serve to degrade the archaeological resource and reduce its significance and potential for creating attractive and distinctive places as well as the economic benefits, which arise either directly from people visiting monuments or indirectly by increasing the attractiveness of places containing archaeological sites.

**12.24** Should significant archaeological finds occur during development, the Council will seek specialist advice and encourage appropriate action, including recording, preservation in situ (the preferred option) or limited or full excavation. In some cases approved schemes may need to be amended to avoid excessive damage to archaeological remains. In all instances copies of evidence should be deposited with the Kent Historic Environment record managed by Kent County Council, and, along with any archives, with a local museum or other public depository.

## DM Policy 46: Archaeology

The archaeological and historic integrity of Scheduled Monuments and other important archaeological sites, together with their settings, will be protected and where possible enhanced. Development which would adversely affect such heritage assets will be assessed in line with DM Policy 44.

Planning applications, on sites where there is, or is the potential for, an archaeological heritage asset, must include an appropriate desk-based assessment of the asset.

In addition, where the assessment reveals that important or potentially significant archaeological heritage assets may exist, developers will be required to, where necessary, arrange for field evaluations to be carried out by an appropriately qualified contractor in advance of the determination of the planning application. Such an evaluation should define:

- i The character, significance and condition of any archaeological deposits or structures within the application site; and
- ii The likely impact of the proposed development on the archaeology, its significance and setting (including the limits to the depth to which groundworks can go on the site); and
- iii The means of mitigating the effect of the proposed development including a statement setting out the impact of the development.

Where the case for development affecting a heritage asset of archaeological interest is accepted, the archaeological remains should be preserved in situ. Where this is not possible or justified, appropriate provision for preservation by record may be an acceptable alternative dependent upon their significance. In such instances archaeological recording should be undertaken by an approved archaeological body, deposited with the Kent Historic Environment Record and should take place in accordance with a specification and programme of work to be submitted to and approved by the District Council in advance of development commencing.

For applications in the Dover Urban Area (as shown on the Proposals Map) the Dover Town Archaeology SPD should be consulted and applicable requirements in such detailed advice should be followed.

## Dover Western Heights Fortifications Scheduled Monument and Conservation Area



Figure 12.1

**12.25** The Western Heights fortifications are located along the crest of a prominent, steep chalk ridge, directly to the west of Dover town centre, overlooking the harbour. The fortifications represent one of the largest and most elaborate surviving examples of nineteenth century fortifications in England and evidence an exceptional record of continuous military occupation over a period of some 170 years, which is unique in scale in the UK. They are designated as a Scheduled Monument, contain a number of Grade II listed structures and the whole site is designated a Conservation Area.

**12.26** Furthermore, the broad expanse of green slopes around the monument forms a notable backdrop to the town of Dover itself, making a key contribution to its urban identity and providing large areas of open space. The majority of these slopes are designated as a Local Nature Reserve and a Local Wildlife Site for their unimproved chalk grassland, which is a priority habitat. Protected species are present, or likely to be present, within the site and its structures. The landscape characteristics, ecology and heritage value of the military site are intrinsically connected.

**12.27** Since World War II, following the departure of the military, the fortifications have fallen into disrepair, decline and invasion by scrub and woodland. Demolition and vandalism have added to the general neglect. The Scheduled Monument is currently on the Historic England 'At Risk' register. The site is currently in multiple ownerships.

**12.28** A Masterplan for Dover Western Heights was prepared by representatives of Dover District Council, Kent County Council, Medway Council, Historic England and the At Fort Partnership in 2015 and is an adopted Supplementary Planning Document to the Local Plan. The masterplan provides a strategic framework for action in order to secure a sustainable future for this unique site through the unlocking of the value of its military heritage and its unique setting and by widening its appeal as a strategic location for inward investment, enhancing the Western Heights as a destination of national and international significance which one which complements Dover's other heritage attractions.

## DM Policy 47: Dover Western Heights Fortifications Scheduled Monument and Conservation Area

Viable uses which conserve and enhance the significance of the Dover Western Heights heritage asset, and which contribute to delivering a sustainable future for the site including its landscape and biodiversity, will be supported. In particular developments should:

- i Make a positive contribution to the character and distinctiveness of this significant heritage asset;
- ii Optimise the opportunities presented by this site to enhance the economic well-being of the town;
- iii Promote and enable the constructive conservation of the built heritage of the site including those elements which are on the Heritage at Risk register;
- iv Respect the overall historical coherence of this heritage asset and provide support for heritage restoration which delivers exemplary standards of conservation, design and sustainable construction;
- v Conserve and enhance the natural environment, ecology and biodiversity of the site;
- vi Enhance awareness and accessibility of this asset for residents and visitors;
- vii Improve connectivity between the fortifications and the town, including, where possible, the delivery of links with the town centre, Dover Priory railway station and the Dover waterfront; and
- viii Comply with the Delivery Principles of the Dover Western Heights Masterplan (2015) and any successor.

Development within the boundary of the Western Heights which would have a detrimental impact on the heritage significance, settings, views, biodiversity, character or coherence of the components and elements of this complex, will not be permitted.

Inter-visibility between different elements of the fortifications within the site and with key features in the surrounding landscape is a key aspect of the significance of this heritage asset and of its potential visitor appeal. New development should therefore not harmfully intrude on key views as identified in the Dover Western Heights Masterplan SPD.

## Historic Parks and Gardens

**12.29** Historic Parks and Gardens are a valuable part of the District's heritage, as well as being important areas of open space providing benefits for biodiversity, tourism, recreation and education. Dover District has six historic parks and gardens on the register of Parks and Gardens of Specific Historic Interest produced by Historic England. These are Goodnestone Park, Kearsney Court, Northbourne Court, The Salutation, Sandwich, Waldershare Park and Walmer Castle. In addition, Kent County Council has identified Betteshanger House, Fredville Park at Nonington and Knowlton Court at Nonington in its Kent Gardens Compendium.

## DM Policy 48: Historic Parks and Gardens

Proposals which protect and enhance the character, fabric, features, setting or views into and from the district's Historic Parks and Gardens as included in Historic England's register of Parks and Gardens of Specific Historic Interest and the Kent Gardens Compendium will be supported.





# 13

## Appendices

Settlement Type	Settlement Description	Settlement
Secondary Regional Centre	Major focus for development in the District; suitable for the largest scale developments.	Dover
District Centre	Secondary focus for development in the District; suitable for urban scale development.	Deal
Rural Service Centre	A principle focus for services for the rural catchment area and suitable for a scale of development that would reinforce its role as a provider of services to a wide rural area.	Sandwich Aylesham
Local Centre	Villages that provide services for a local rural area and a secondary focus for development in the rural area at a scale that would reinforce their roles.	Eastry Wingham Ash Shepherdswell St Margarets at Cliffe Eythorne Elvington
Larger Villages	Settlements that have limited services for residents where windfall development would be acceptable in principle in or adjoining.	Kingsdown Capel-le-Ferne Lydden Preston Worth Northbourne Alkham Goodnestone Ripple East Langdon
Smaller Villages and Hamlets	Small settlements with few facilities where windfall infill development would be acceptable in principle.	Martin Mill Denton Ringwould Wingham Green Chillenden

Settlement Type	Settlement Description	Settlement
		Tilmanstone
		Nonington
		Barnsole
		Finglesham
		Wootton
		Woodnesborough
		Betteshanger
		Coldred
		Martin
		Stourmouth
		West Hougham
		Staple
		Wootton
		Elmstone
		East Studdal
		Sutton
		West Langdon
		Ashley

	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38	2038/39	2039/40	Total		
Extant supply (10% non-implementation discount)	374	775	800	404	104	260	203	101	64	64	3	0	0	0	0	0	0	0	0	0	0	3,151	
Whitfield (extant and allocation)	52	134	111	120	120	140	200	200	200	200	200	200	200	200	200	200	200	200	200	200	206	3,483	
Draft Allocations Reg 18	0	0	266	279	678	1,129	1,092	595	247	149	357	251	129	71	71	1	0	0	0	0	0	0	5,315
Windfall (small sites)	0	0	0	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	70	1,190	
Total Supply	426	909	1,177	873	972	1,599	1,565	966	581	483	630	521	399	941	341	271	270	270	270	270	276	13,139	
Local Plan housing need figure (inc 10% buffer)	656	656	656	656	656	656	656	656	656	656	656	656	655	655	655	655	655	655	655	655	655	13,112	
Balance	-231	253	521	217	316	943	909	310	-75	-173	-26	-135	-256	-314	-314	-384	-385	-385	-385	-379	27	27	
Cumulative supply balance	-231	22	544	761	1,077	2,020	2,929	3,238	3,163	2,990	2,964	2,829	2,573	2,259	1,945	1,561	1,176	791	406	27			

Table 14.1

Topic	Study	Study Abbreviation	Link to Study
Whole Plan	Sustainability Appraisal of the draft Local Plan (2020)	SA	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Habitat Regulation Assessment of the draft Local Plan (2020)	HRA	To be published alongside the Regulation 18 consultation on the draft Local Plan
	HDH Planning & Development Ltd - Dover District Council Whole Plan Viability Study (2020)		To be published alongside the Regulation 18 consultation on the draft Local Plan
Climate Change	Local Plan Climate Change Workshop Report (2019)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Climate-Change-Workshop-Report-20-01.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Climate-Change-Workshop-Report-20-01.pdf</a>
	Strategic Flood Risk Assessment (2019)	SFRA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Flood-Risk-Assessment-March-2019.pdf</a>
	Site-specific Guidance for Managing Flood Risk (2019)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Site-Specific-Guidance-for-Managing-Flood-Risk-March-2019.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Site-Specific-Guidance-for-Managing-Flood-Risk-March-2019.pdf</a>
	Review of Coastal Change Management Areas in Dover District (2018)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Coastal-Change-Management-Areas-Final-Report-June-2018.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SFRA-Coastal-Change-Management-Areas-Final-Report-June-2018.pdf</a>
	Climate Change Topic Paper		To be published alongside the Regulation 18 consultation on the draft Local Plan
Housing	Strategic Housing Market Assessment Part 1 (2017)	SHMA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Housing-Market-Assessment.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Strategic-Housing-Market-Assessment.pdf</a>

Topic	Study	Study Abbreviation	Link to Study
	Strategic Housing Market Assessment Part 2 (2017)	SHMA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHMA-Dover-Part-2-Feb-2017.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SHMA-Dover-Part-2-Feb-2017.pdf</a>
	Strategic Housing Market Assessment (Partial Update 2019)	SHMA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-SHMA-Partial-Update-with-appendices.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-SHMA-Partial-Update-with-appendices.pdf</a>
	Housing and Economic Land Availability Assessment (HELAA) (2020)	HELAA	To be published alongside the Regulation 18 consultation on the draft Local Plan Interim HELAA published online <a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/HELAA.aspx">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/New-District-Local-Plan/HELAA.aspx</a>
	Settlement Hierarchy Review (2020)	SHR	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Gypsy, Traveller and Travelling Show Person Accommodation Assessment (2018)	GTAA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-GTAA-Report-2018-Dec-21-Version.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Final-GTAA-Report-2018-Dec-21-Version.pdf</a>
	Gypsy and Traveller Site Options (Review)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Site-Options-review-March-2020.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Site-Options-review-March-2020.pdf</a>
	Gypsy and Traveller Potential Sites (Assessment)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Potential-Sites-assessment-March-2020.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Gypsy-Traveller-Potential-Sites-assessment-March-2020.pdf</a>
	Dover Mid Town Flood Modelling		To be published alongside the Regulation 18 consultation on the draft Local Plan

Topic	Study	Study Abbreviation	Link to Study
	Housing Topic Paper		To be published alongside the Regulation 18 consultation on the draft Local Plan
Employment and the Local Economy	Economic Development Needs Assessment (2017)	EDNA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-EDNA-Report-01.03.17.pdf</a>
	Economic Growth Strategy (2020)	EGS	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Employment Land Review (2020)	ELR	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Tourism Topic Paper		To be published alongside the Regulation 18 consultation on the draft Local Plan
Retail and Town Centres	Retail and Town Centre Needs Assessment (2018)	RTCNA	<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/RTCNA-Final-Report-2018.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/RTCNA-Final-Report-2018.pdf</a>
Transport and Infrastructure	Kent Vehicle Parking Standards - Supplementary Planning Guidance 4 (2006)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SPG4-Vehicle-Parking-Standards-July-2006.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/SPG4-Vehicle-Parking-Standards-July-2006.pdf</a>
	Kent Design Guide Review: Interim Guidance Note 3 -Residential Parking (2008)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Supplementary-guidance-residential-parking.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Supplementary-guidance-residential-parking.pdf</a>
	Knight Kavanagh & Page - Dover District Council Open Space Assessment Report (2019)	OSA	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Knight, Kavanagh & Page - Dover District Council Open Space and Play Standards Paper (2019)		To be published alongside the Regulation 18 consultation on the draft Local Plan

Topic	Study	Study Abbreviation	Link to Study
	Knight, Kavanagh & Page - Dover District Playing Pitch Strategy Assessment Report (2019)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	Knight, Kavanagh & Page - Playing Pitch Strategy & Action Plan. (2019)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	WSP - Dover and Deal Transport Model Local Plan Forecasting Report (2020)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	WSP - Dover and Deal Transport Model Specification Report (2018)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/180502-Dover-and-Deal-Transport-Model-ASR-Final-Public.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/180502-Dover-and-Deal-Transport-Model-ASR-Final-Public.pdf</a>
	WSP - North Deal Study Data Collection Report		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/2018.02.13-Deal-Data-Collection-Report-FINAL-Public.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/2018.02.13-Deal-Data-Collection-Report-FINAL-Public.pdf</a>
Natural Environment	Landscape Character Appraisal (2020)	LCA	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Air Quality Study	AQS	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Water Cycle Study (2020)	WCS	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Thanet Coast SPA Mitigation Strategy (2012)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Thanet-Coast-SPA-Mitigation-Strategy.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Thanet-Coast-SPA-Mitigation-Strategy.pdf</a>



Topic	Study	Study Abbreviation	Link to Study
	Sandwich Bay Visitor Surveys January – March 2020 (Blackwood Bayne Ltd 2020)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	Visitor Survey for Sandwich Bay & Pegwell Bay 2018 (Strategic Research and Insight Ltd 2018)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	Thanet Coast and Sandwich Bay SPA Mitigation Strategy Update (2020)		To be published alongside the Regulation 18 consultation on the draft Local Plan
	Green Infrastructure Strategy (2014)		<a href="https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf">https://www.dover.gov.uk/Planning/Planning-Policy-and-Regeneration/PDF/Dover-District-Council-Green-Infrastructure-Strategy.pdf</a>
	Natural Environment Topic Paper		To be published alongside the Regulation 18 consultation on the draft Local Plan
Historic Environment	Revised Heritage Strategy (2020)	HS	<a href="https://www.dover.gov.uk/Planning/Regeneration/PDF/Heritage-Strategy-main-doc-web-PDF.pdf">https://www.dover.gov.uk/Planning/Regeneration/PDF/Heritage-Strategy-main-doc-web-PDF.pdf</a>
	Conservation Area Appraisals	CAA	<a href="https://www.dover.gov.uk/Planning/Conservation/Conservation-Areas/Conservation-Areas.aspx">https://www.dover.gov.uk/Planning/Conservation/Conservation-Areas/Conservation-Areas.aspx</a>
	Urban Archaeological Database (DDC/KCC 2020)	UAD	To be published alongside the Regulation 18 consultation on the draft Local Plan
	Historic Environment Topic Paper		To be published alongside the Regulation 18 consultation on the draft Local Plan





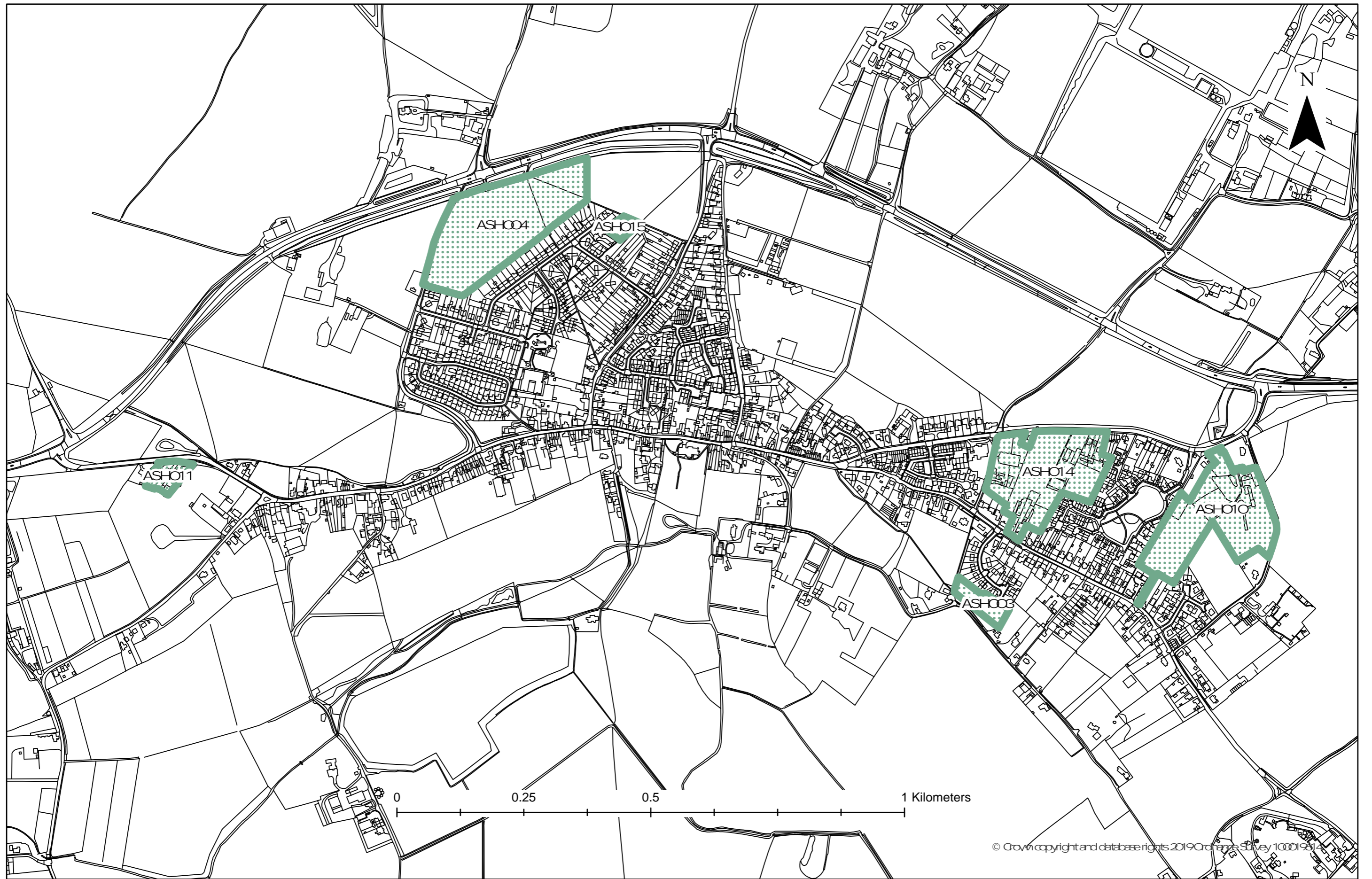
# Appendices: Housing Allocations

# Alkham

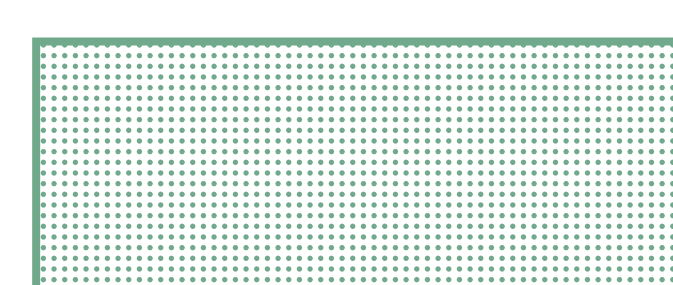
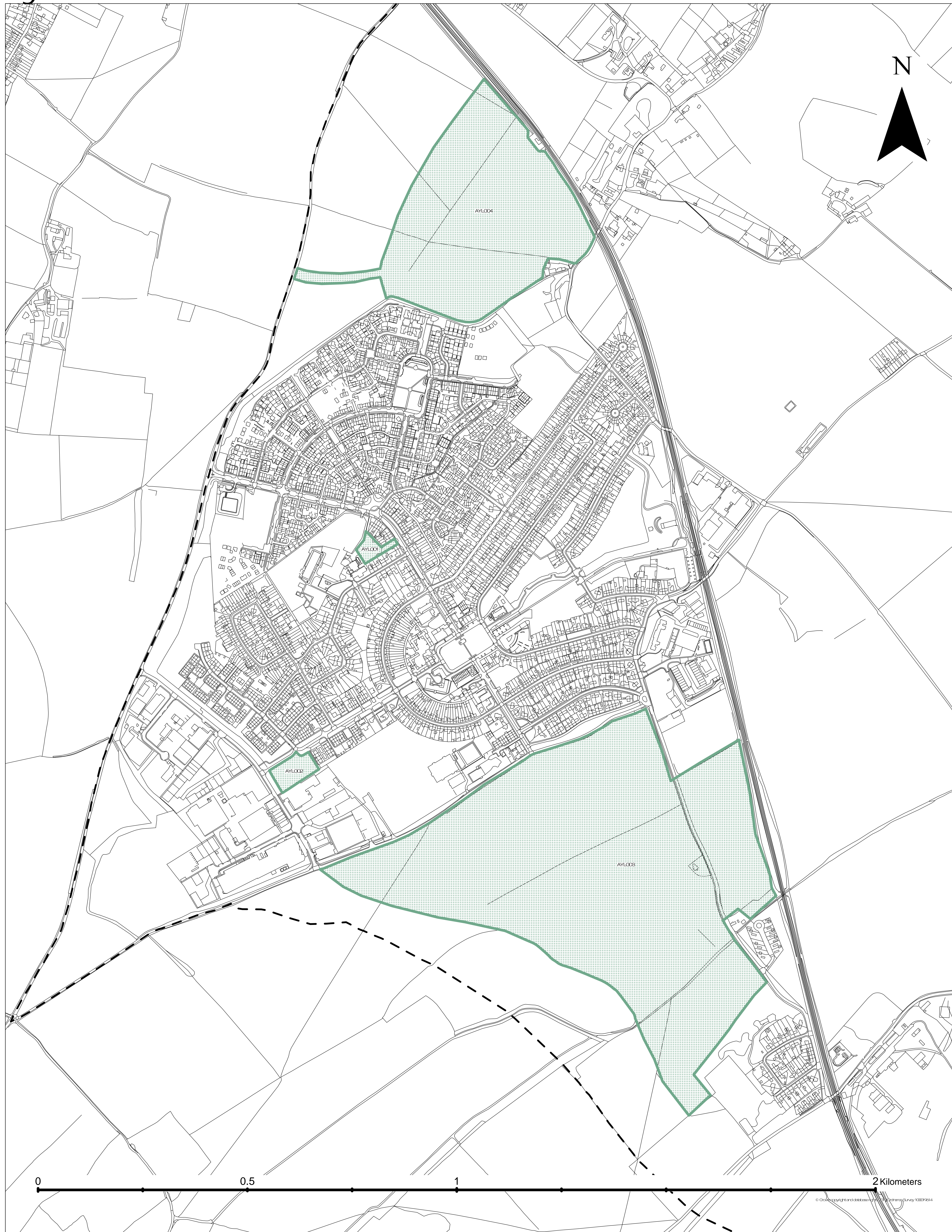


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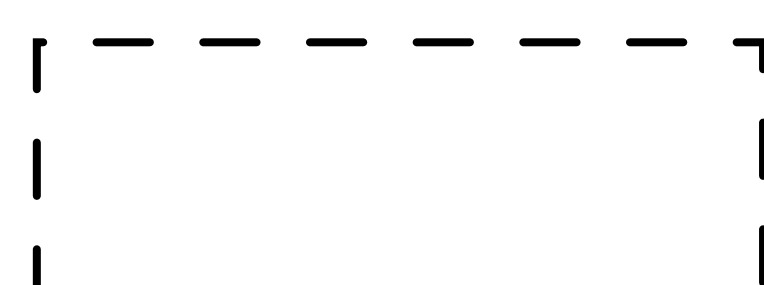
 Proposed Allocations



 Proposed Allocations



Proposed Allocations



District Boundary

# Capel le Ferne

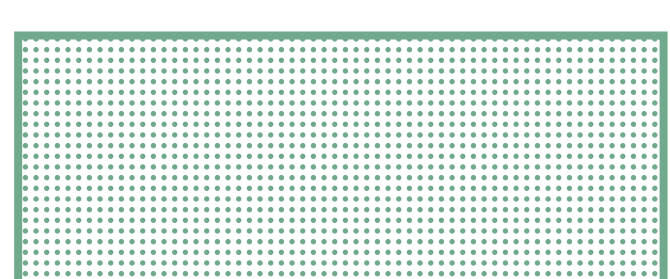


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 Proposed Allocations

 District Boundary

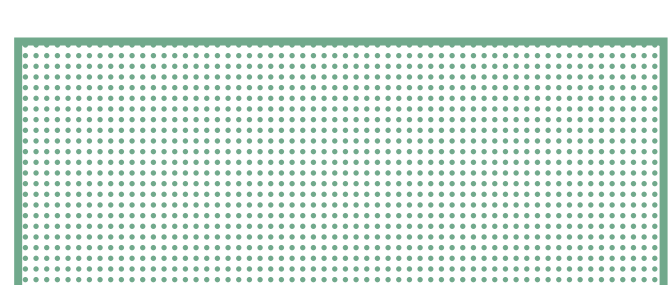
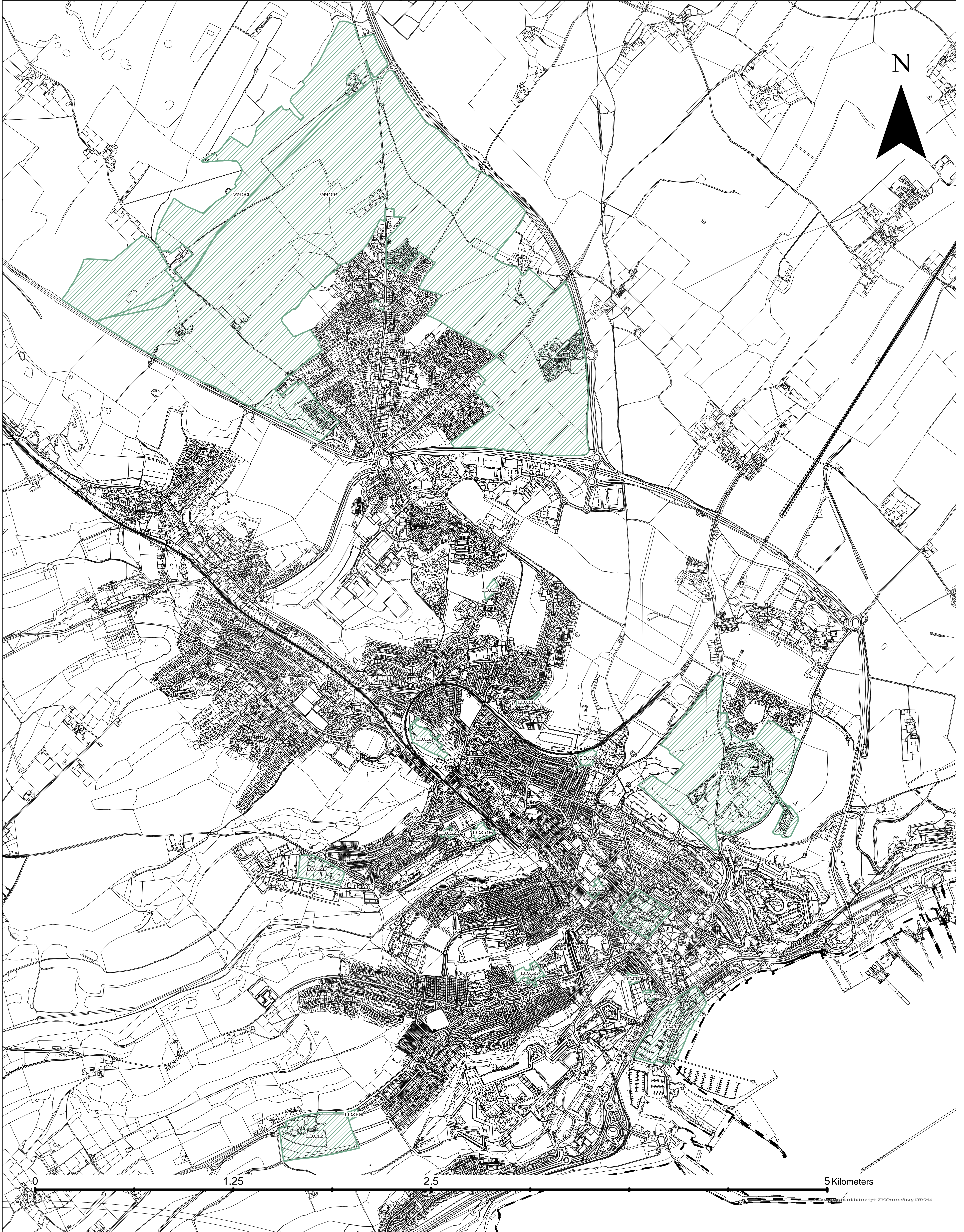
# Deal, Walmer, Sholden and Great Mongeham



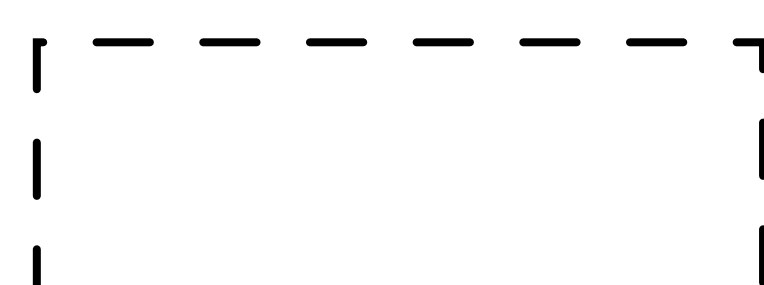
Proposed Allocations



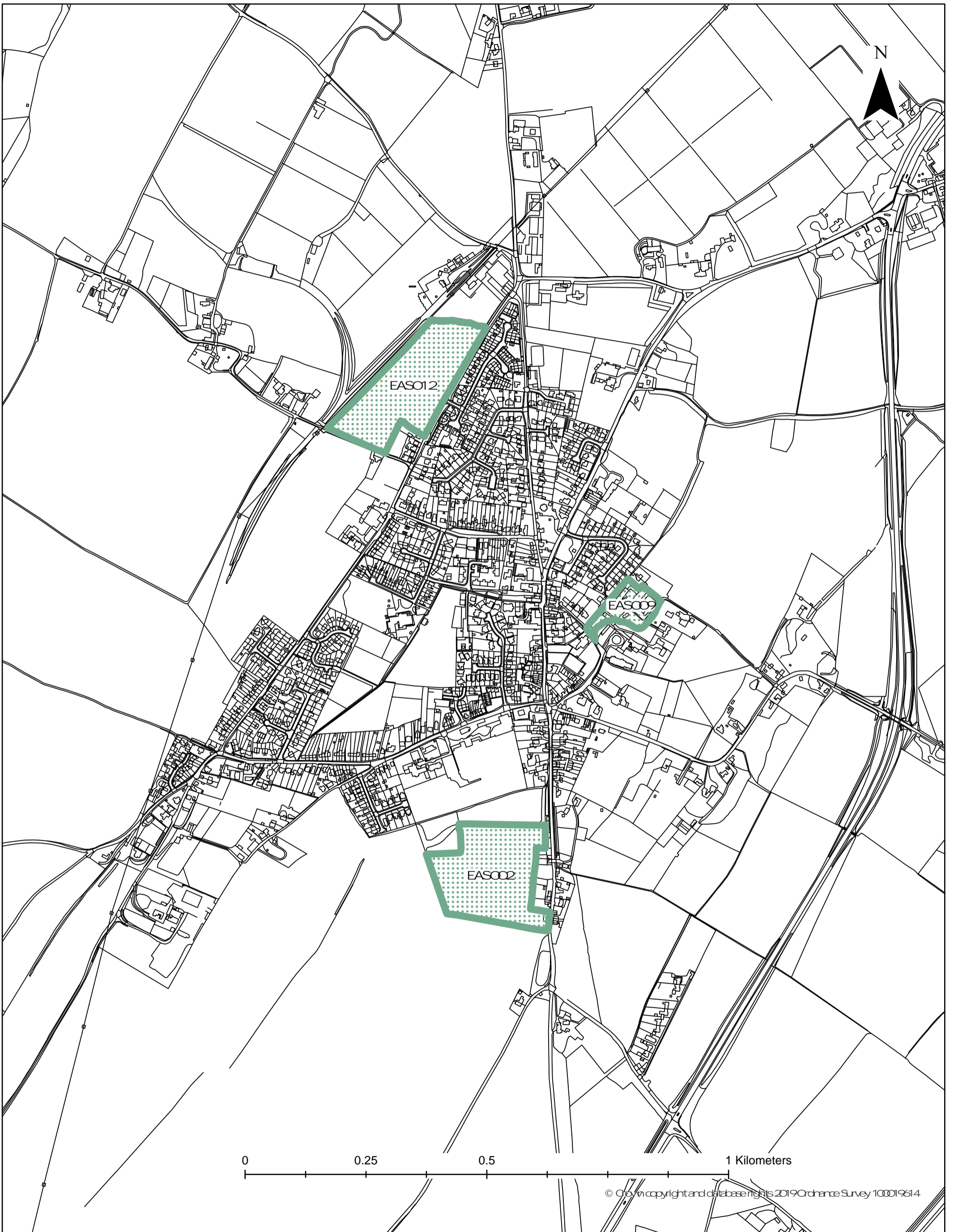
# Dover, Whitfield, Guston & Temple Ewell



Proposed Allocations

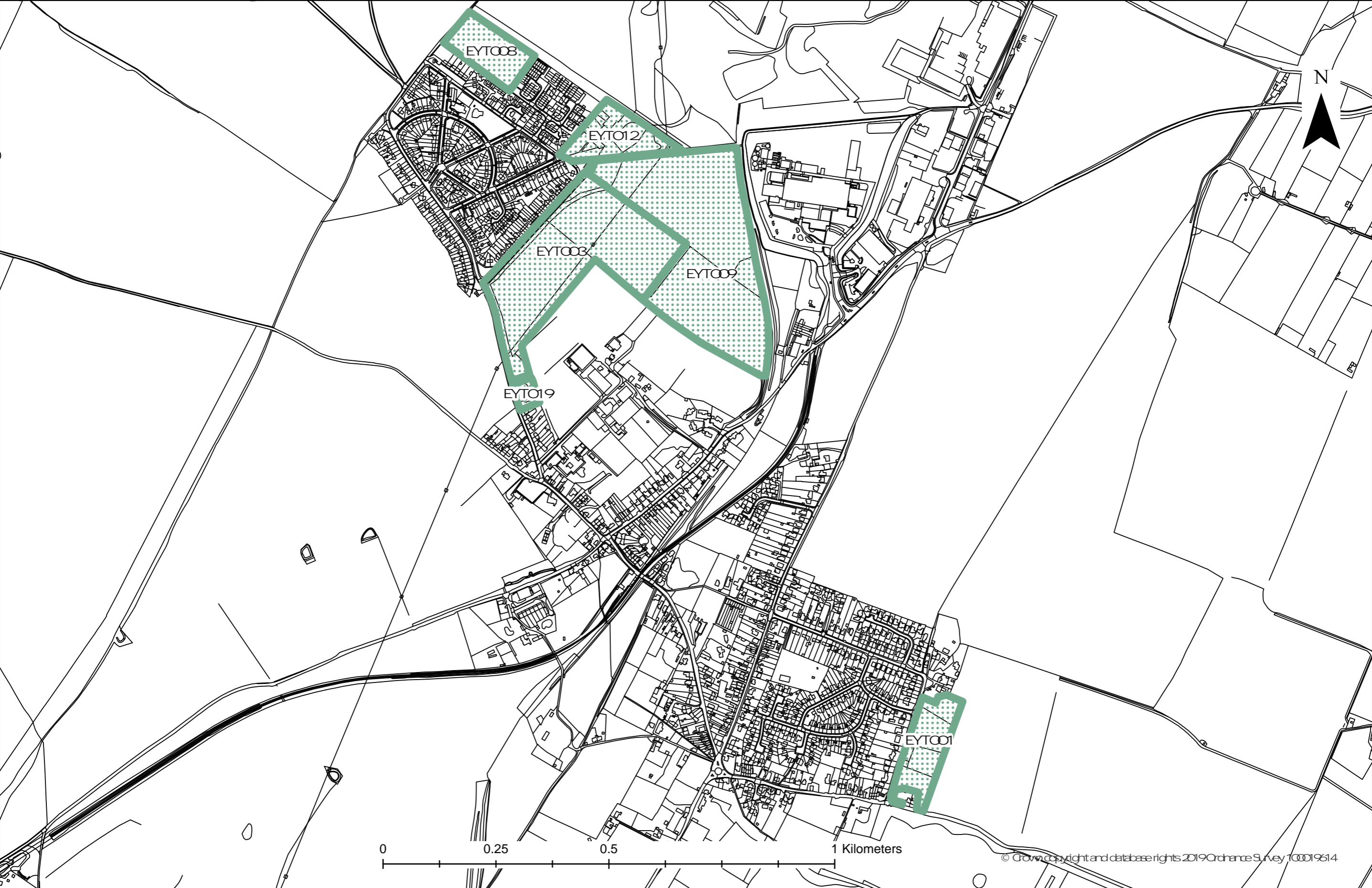


District Boundary



Proposed Allocations

# Eythorne and Elvington



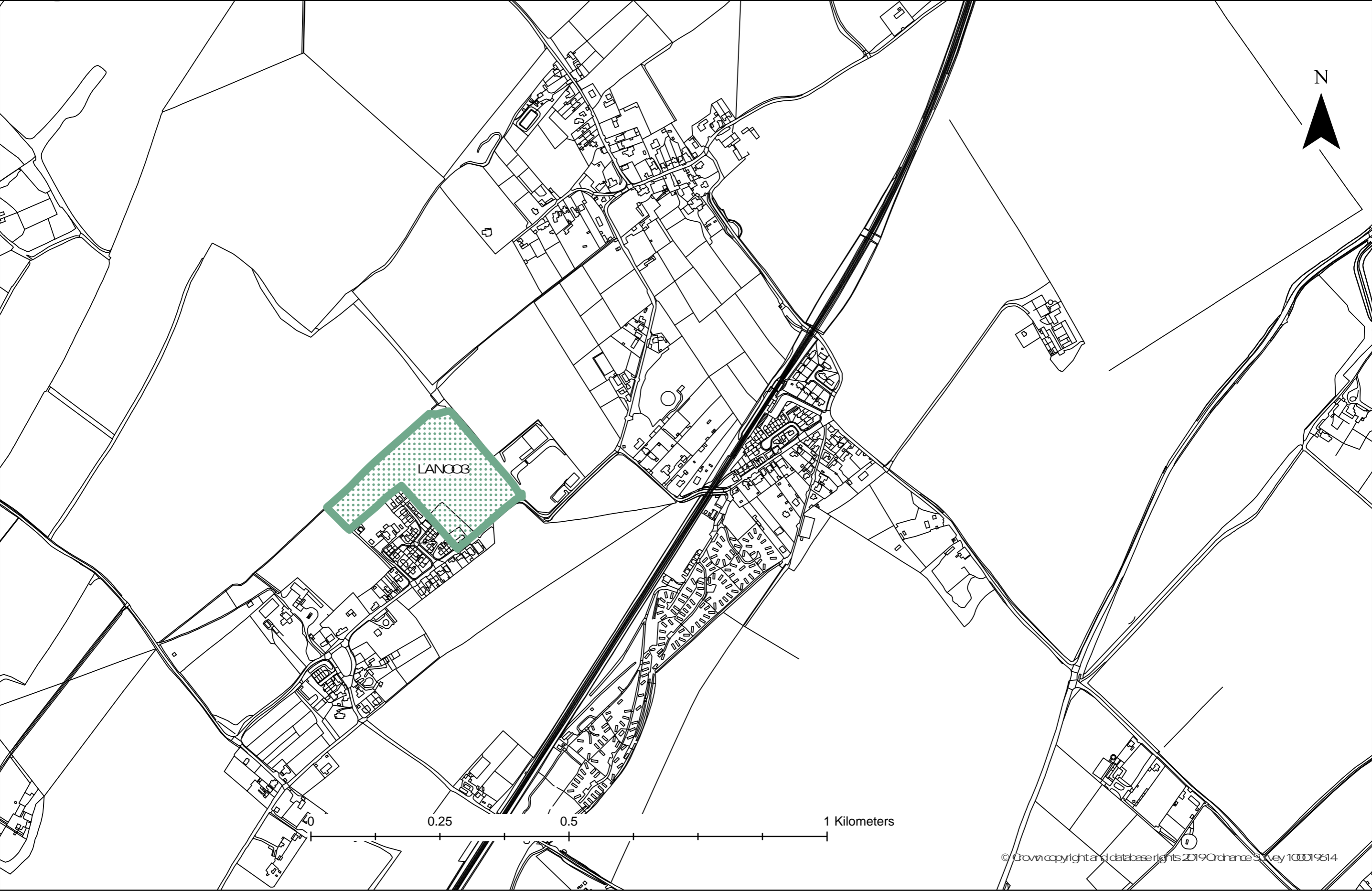
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 Proposed Allocations

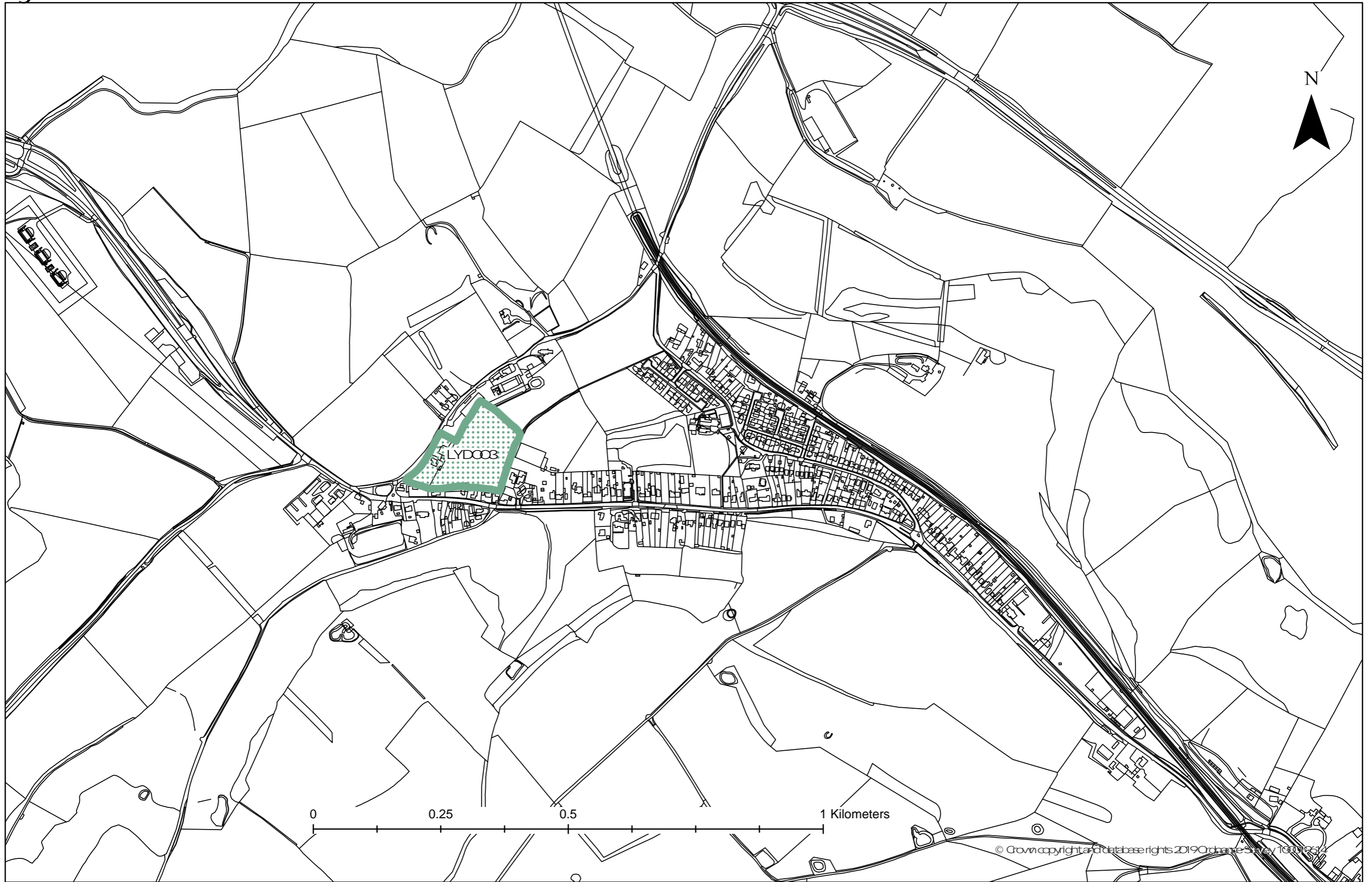
# Goodstone and Chillenden



 Proposed Allocations



 Proposed Allocations



 Proposed Allocations

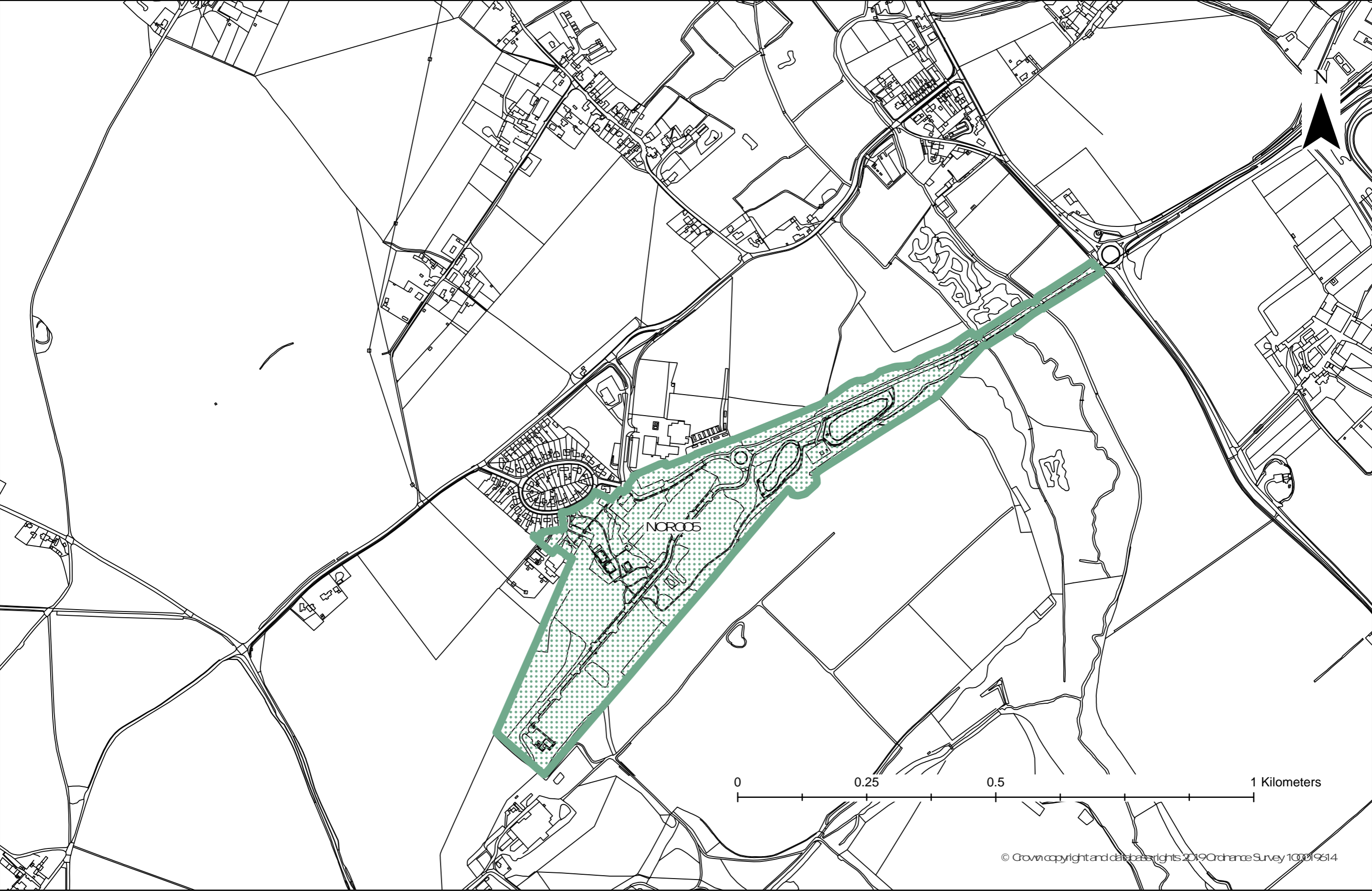
# Nbrington



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 Proposed Allocations

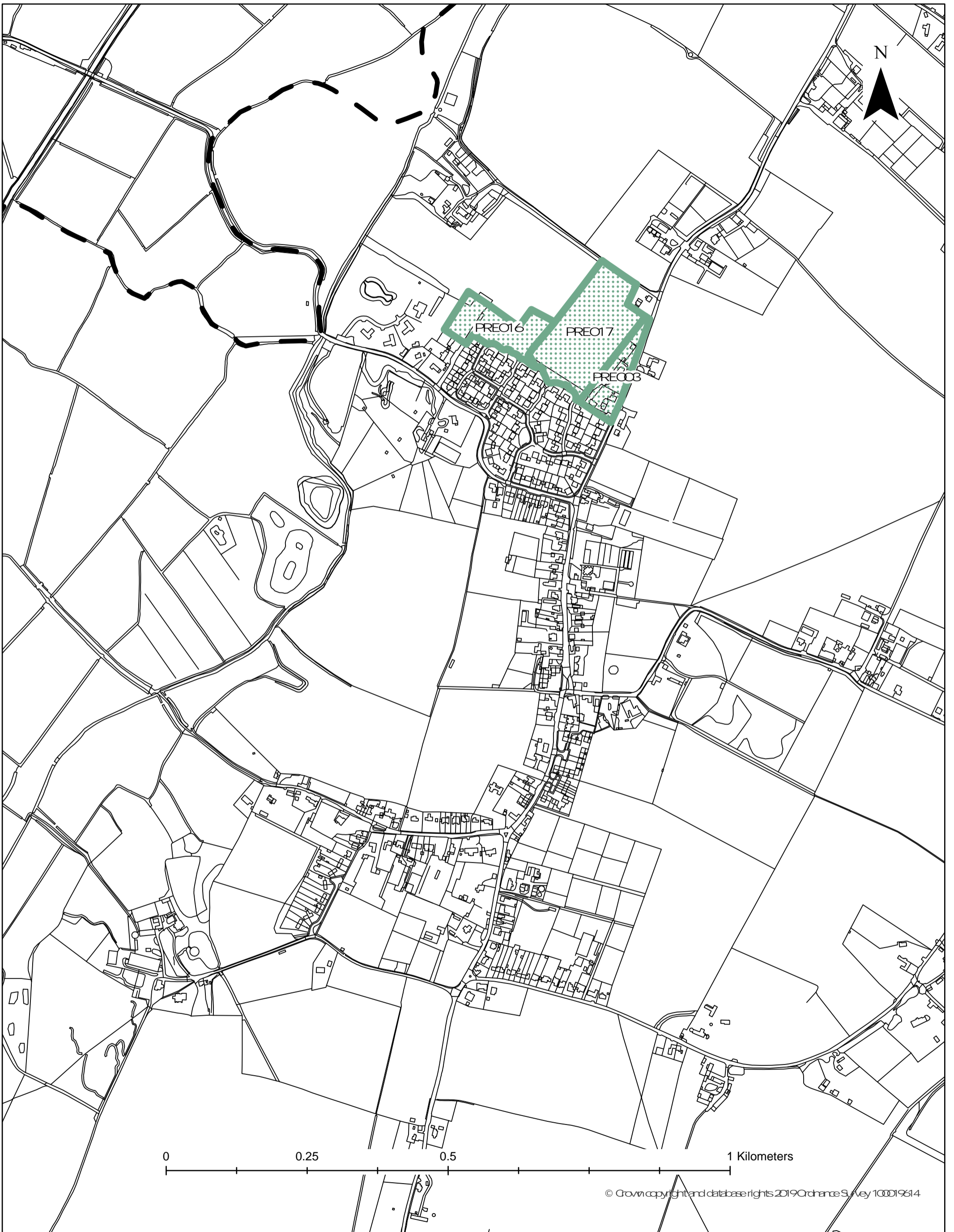
# Northbourne



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 Proposed Allocations





Proposed Allocations



District Boundary

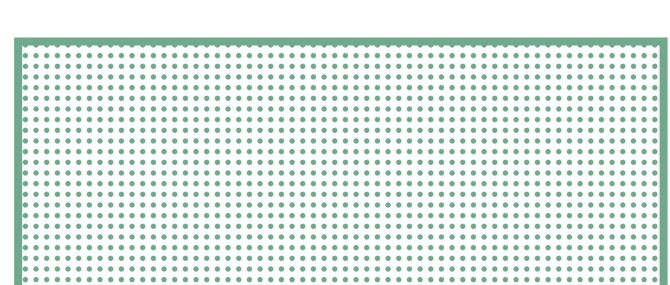
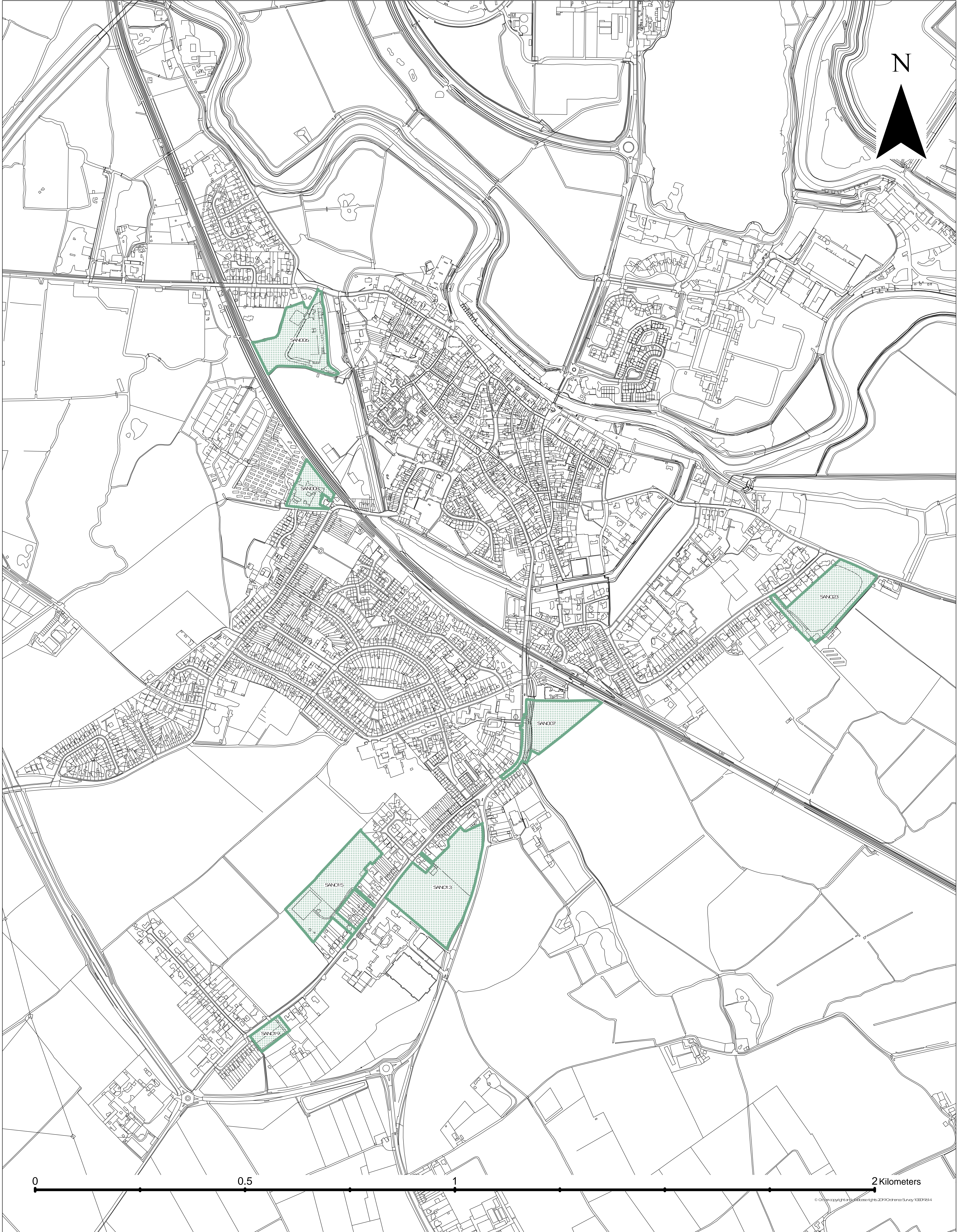
# Ringvold with Kingsdown



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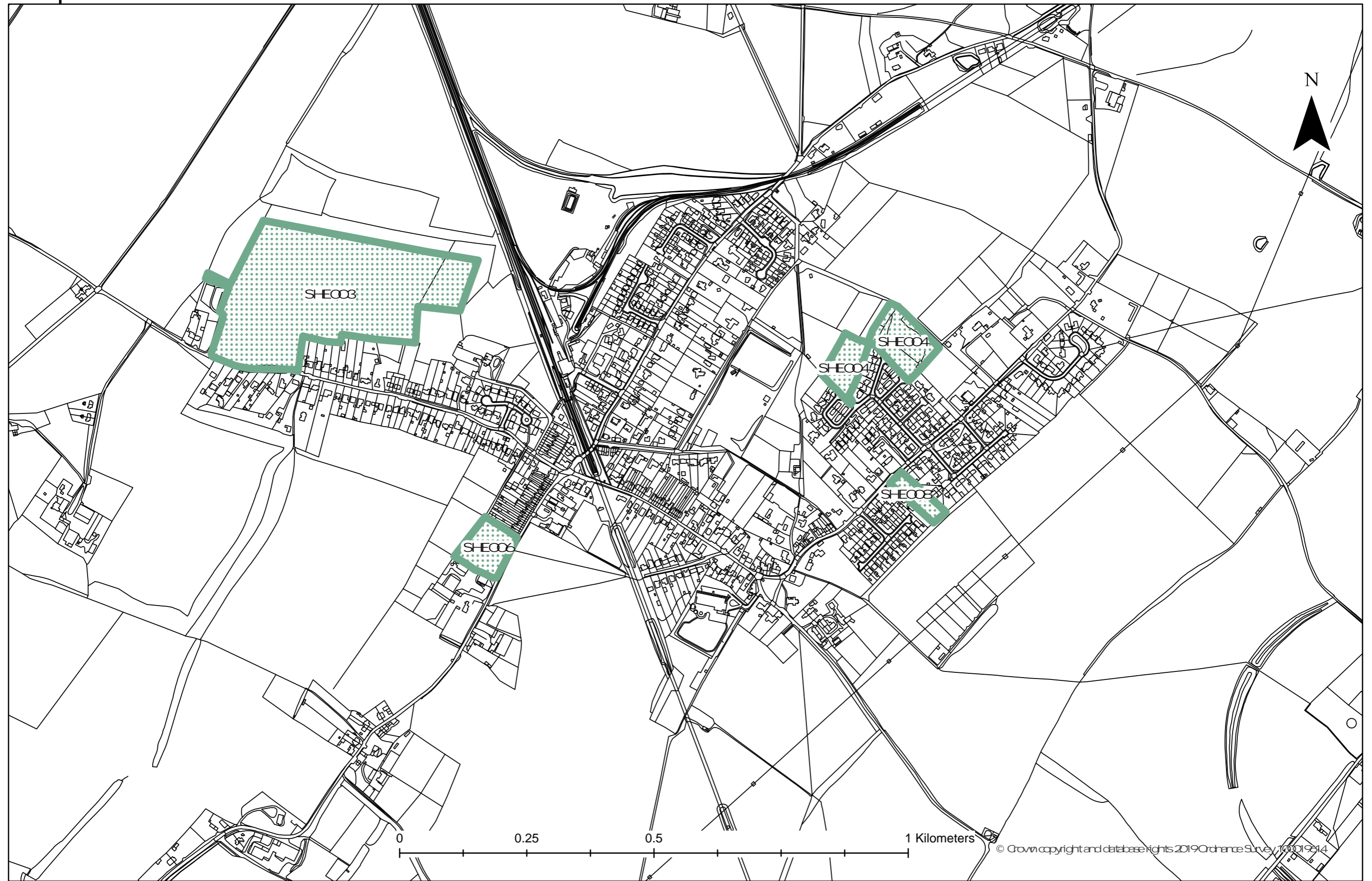
 Proposed Allocations

 District Boundary



Proposed Allocations

# Shepherdswell with Coldred



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 Proposed Allocations



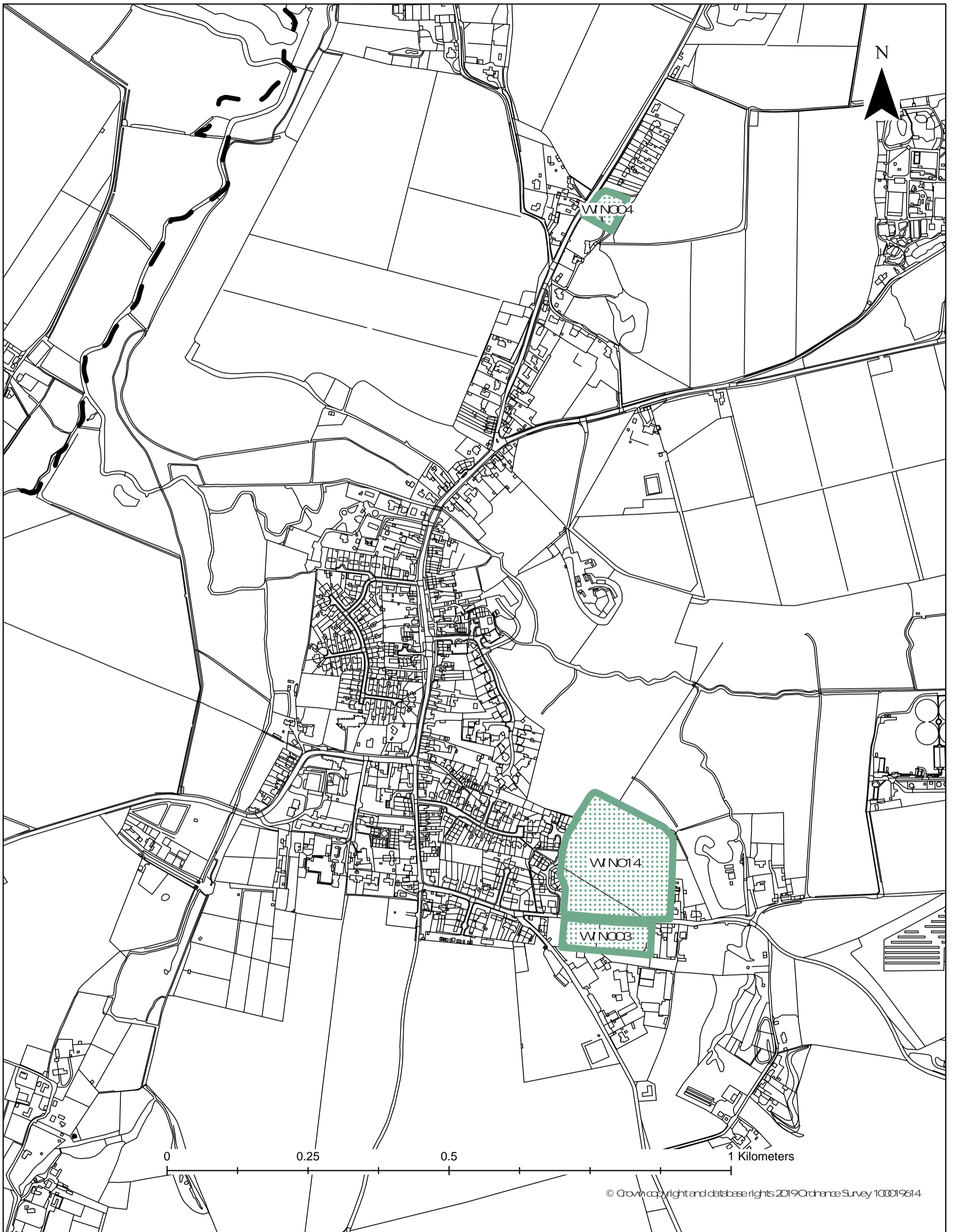
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Proposed Allocations



 Proposed Allocations



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Proposed Allocations



District Boundary

# Woodesborough



 Proposed Allocations



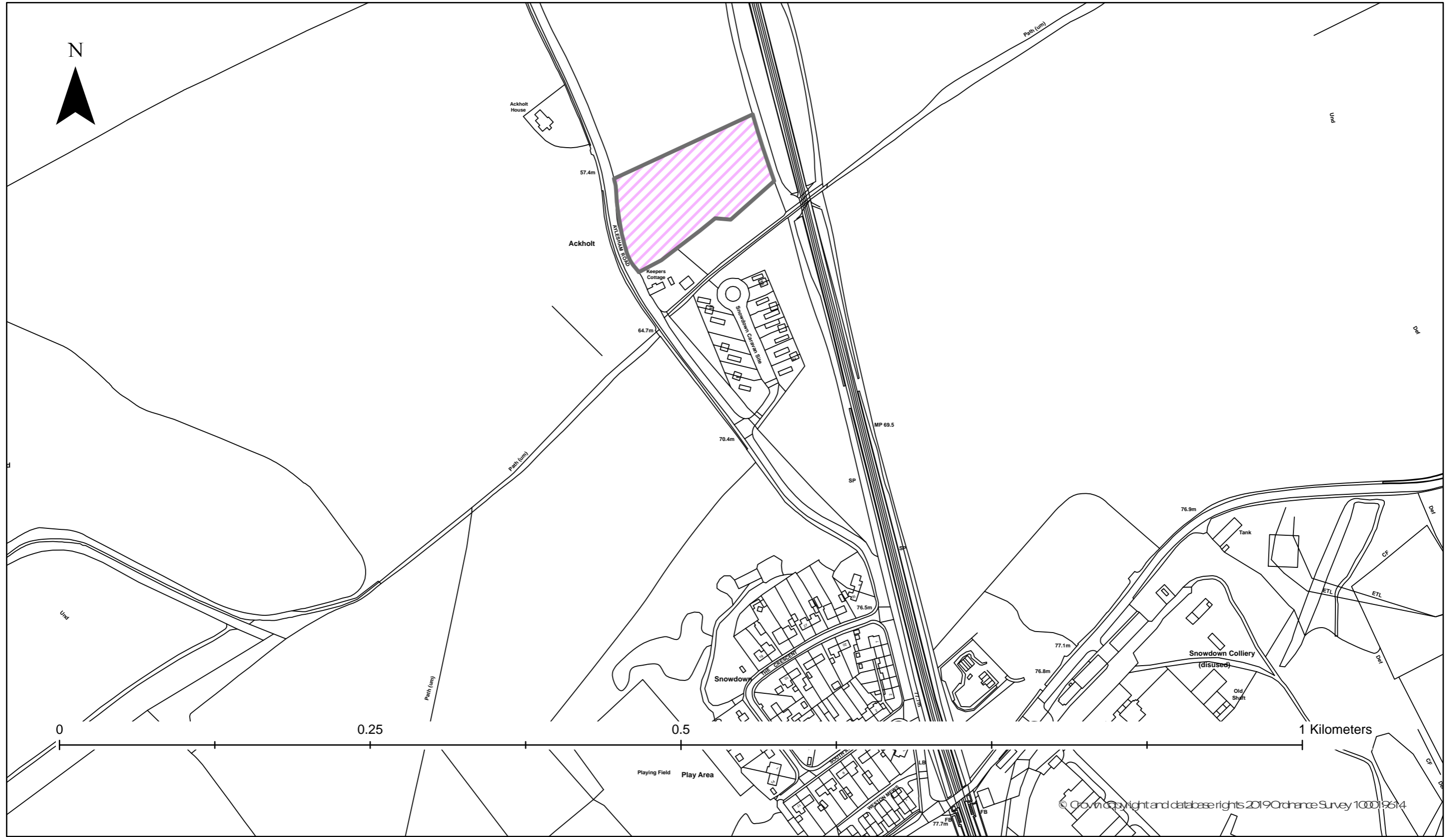


 Proposed Allocations



# Appendices: Gypsy and Traveller Allocations

# Land at Aylesham Road

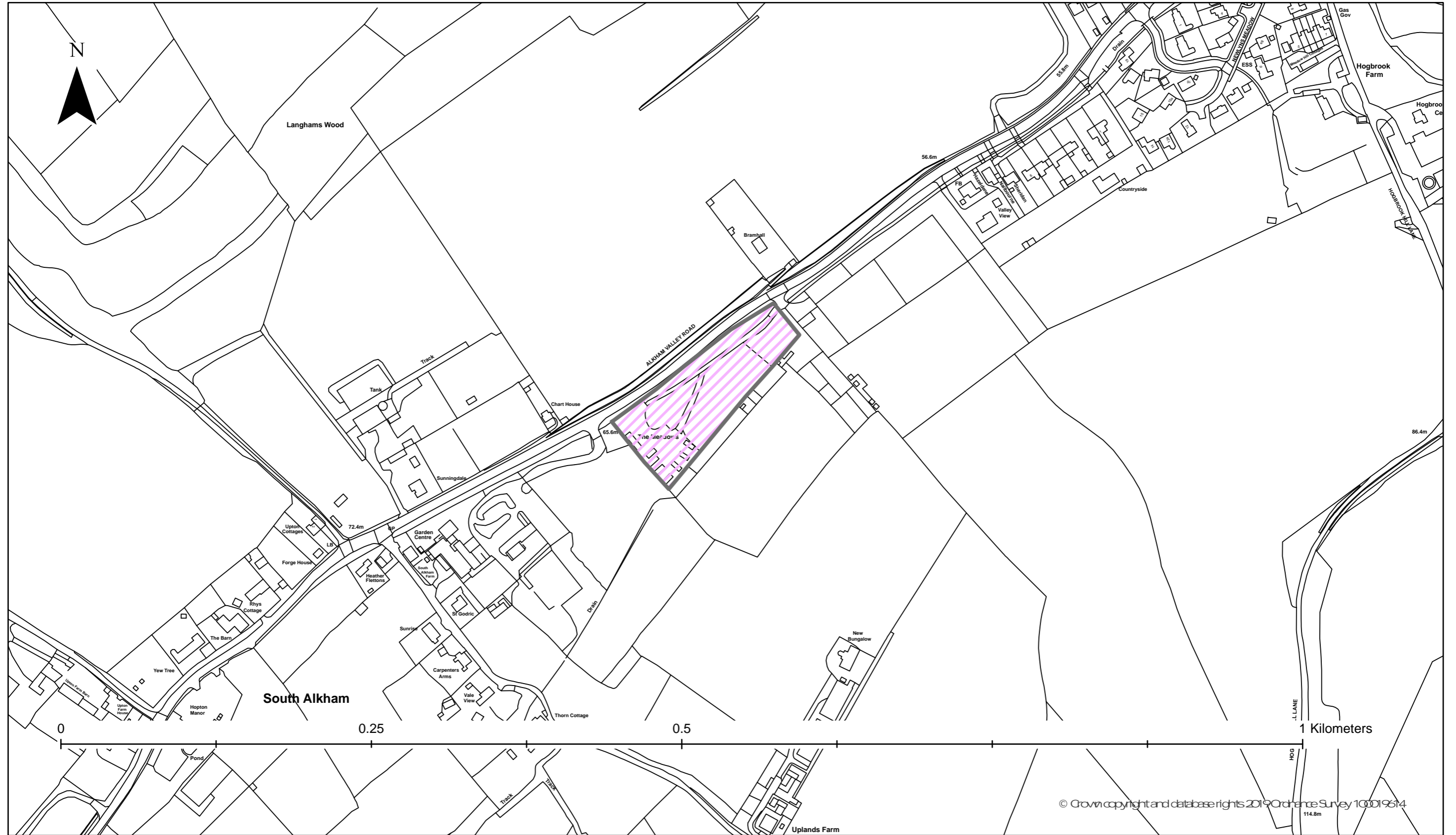


## Legend

 Proposed G&T Allocation

 Proposed G&T Intensification

# Land to the south of Alkham Valley Road / land to the rear of The Meadows, Alkham, CT15 7EW

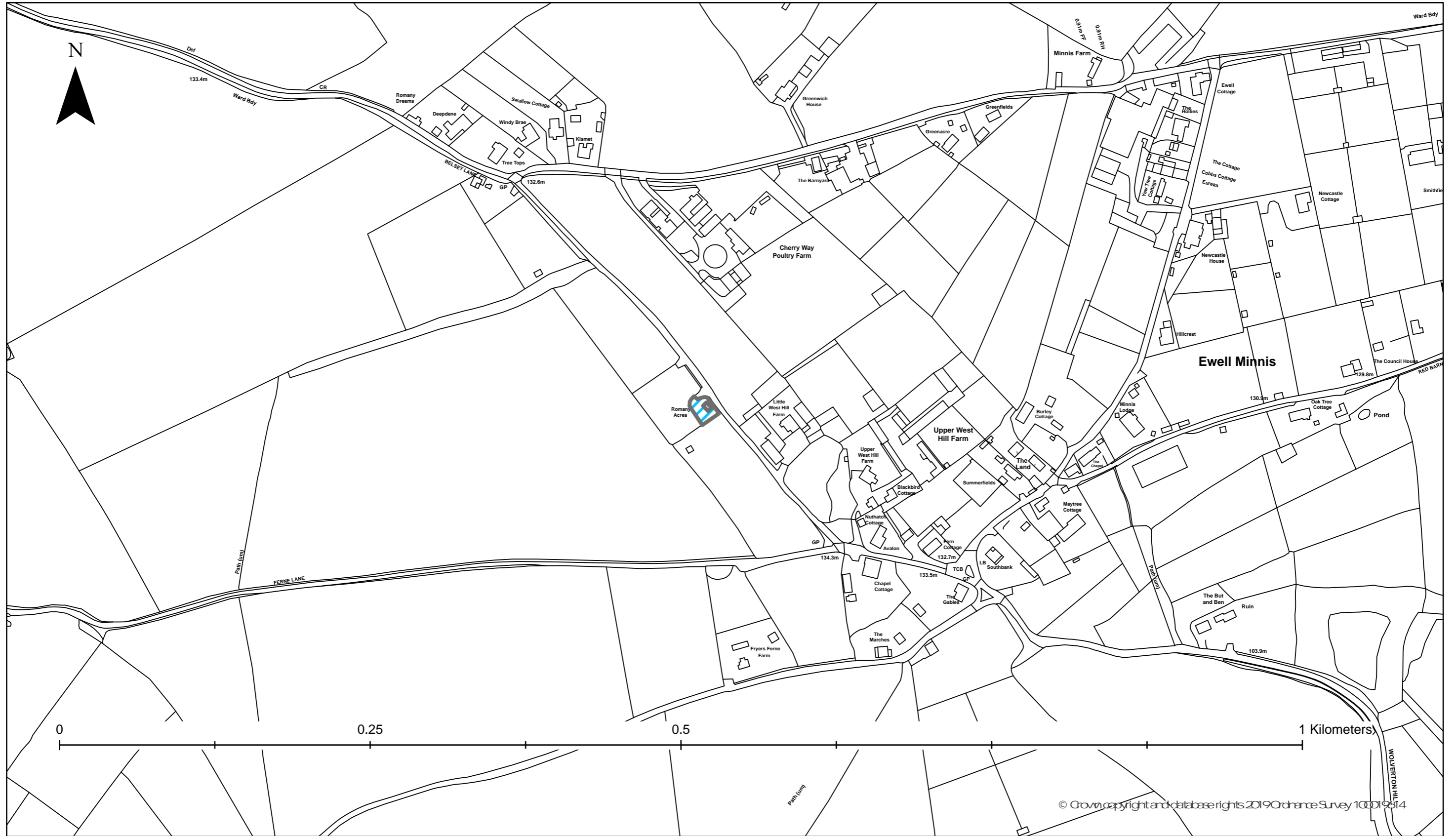


## Legend

 Proposed G&T Allocation

 Proposed G&T Intensification

# Romany Acres Caravan, Romany Acres, Belsey Lane, Ewell Minnis CT15 7DY



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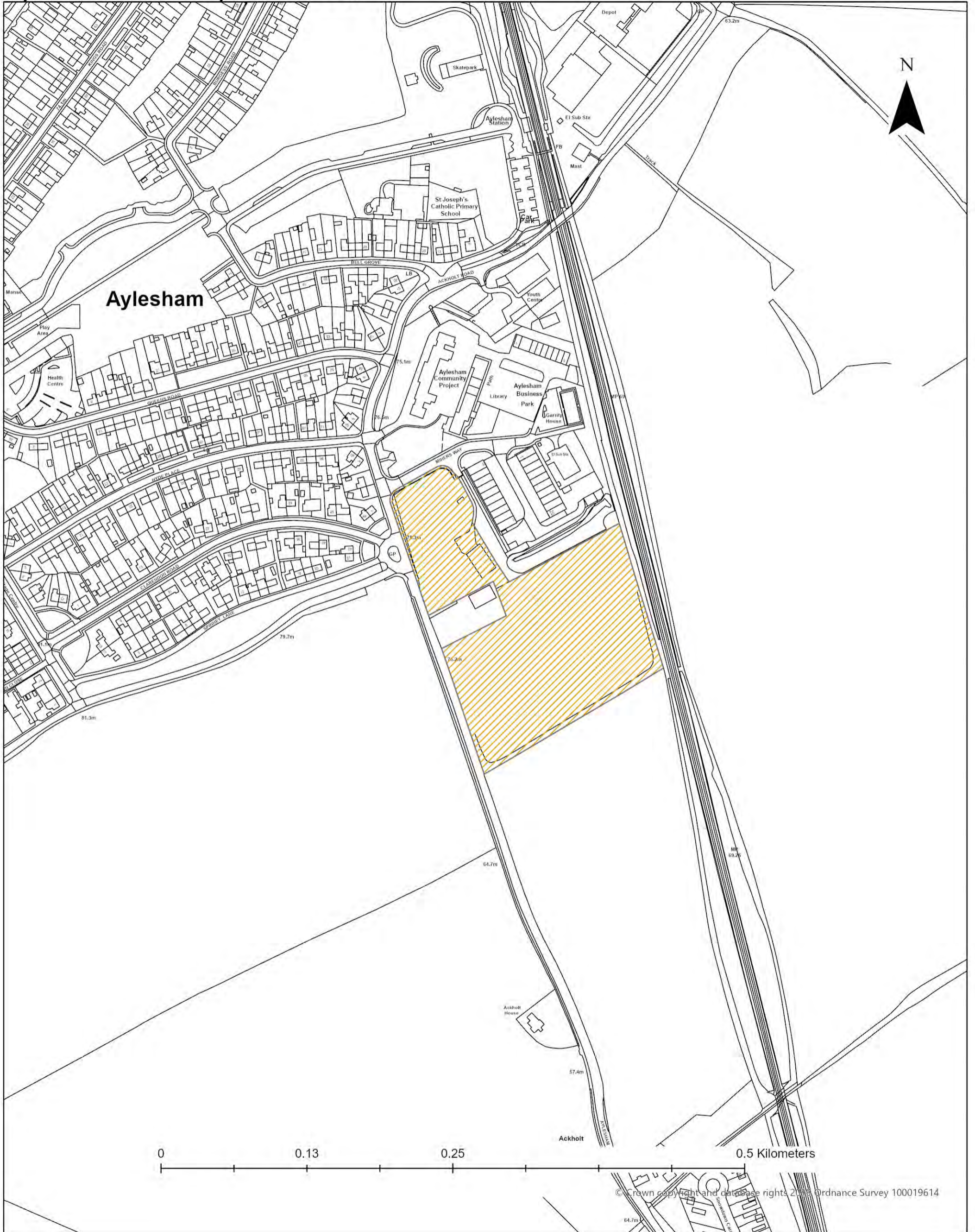
## Legend

-  Proposed G&T Allocation
-  Proposed G&T Intensification



# Appendices: Employment Allocations

# Aylesham Development Area



Proposed Employment Allocations

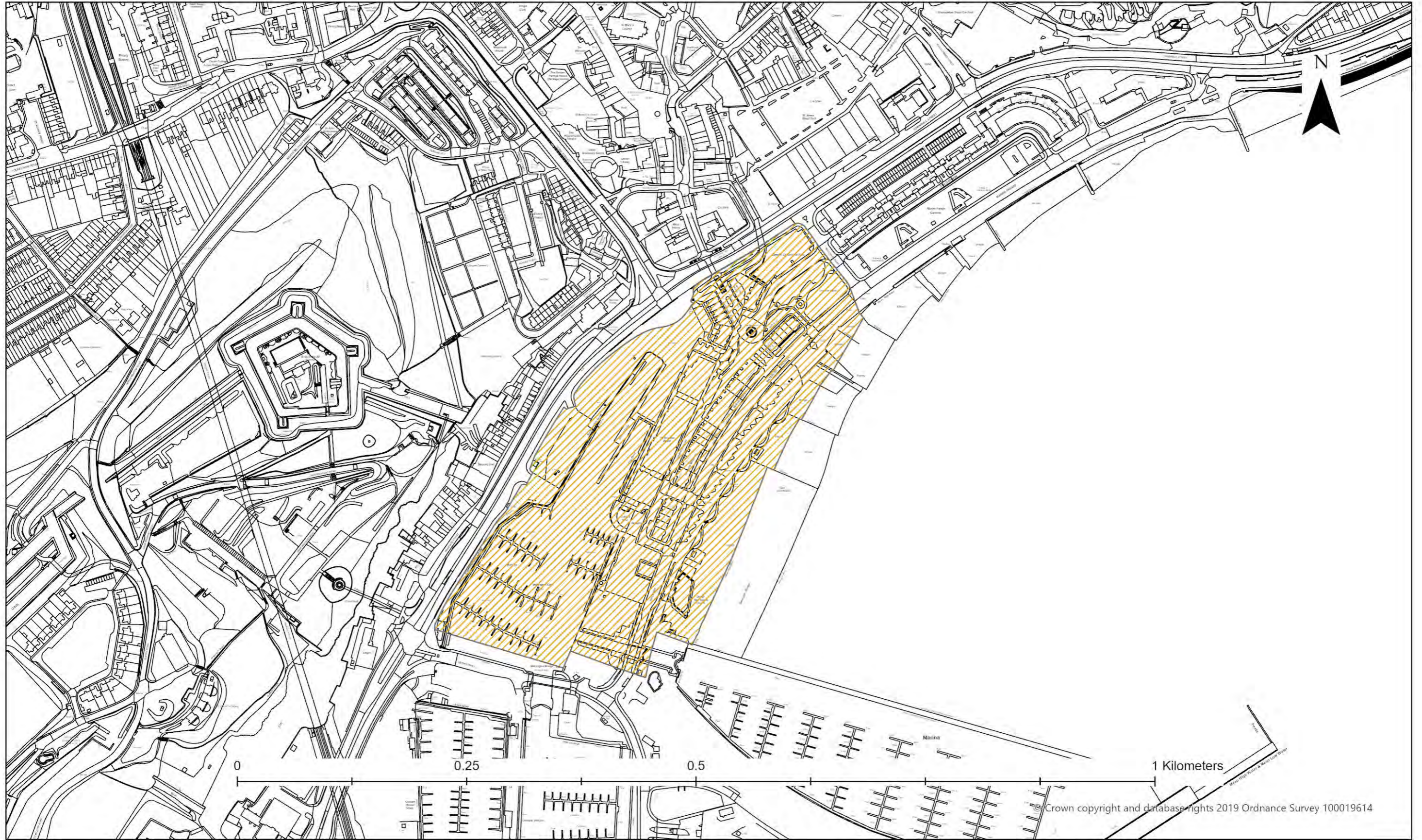
# Discovery Park Enterprise Zone, Sandwich



Proposed Employment Allocations



# Dover Waterfront



Proposed Employment Allocations

# Ramsgate Road, Sandwich



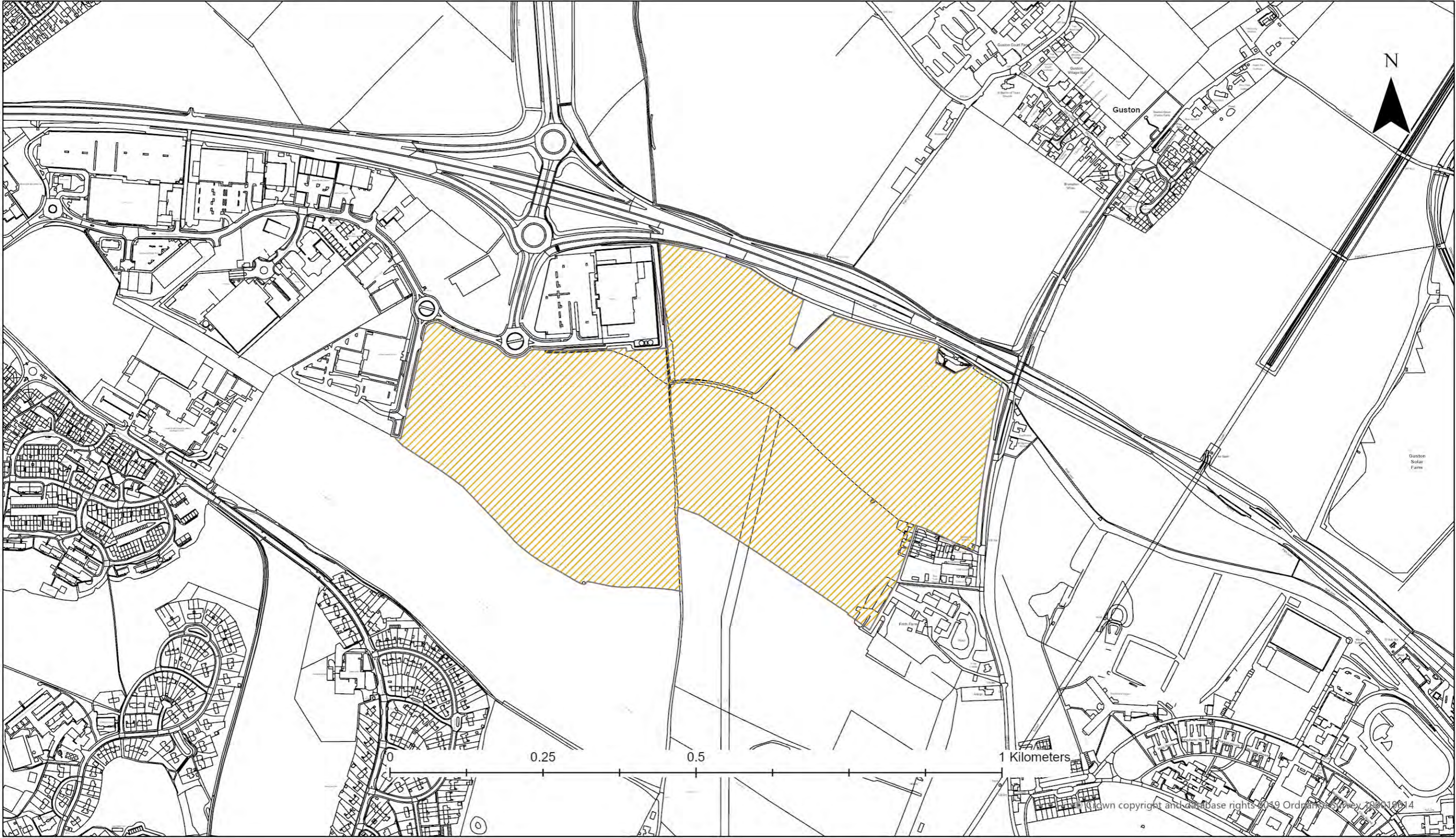
Proposed Employment Allocations

# Sandwich Industrial Estate



Proposed Employment Allocations

# White Cliffs Business Park Phases II-III



Proposed Employment Allocations

**Dover District Council**  
**Local Plan Engagement Strategy**

**Overview**

This document sets out the Council's approach to consulting and engaging the community and key stakeholders at the Regulation 18 stage of the Dover Local Plan.

**Consultation – Key Issues for the Local Plan (Regulation 18)**

This stage in the process provides an opportunity for local residents and key stakeholders to engage with the Council on the key issues that the Local Plan should address. We are seeking views from the whole community, including residents and community groups, business, landowners, developers as well as statutory consultees, delivery partners and infrastructure providers.

The Draft Dover District Local Plan (Reg 18) will be published for an eight-week period of consultation. Following on from the consultation, officers will review and respond to all representations received, and these will help inform the development of a draft Local Plan.

The consultation to be undertaken is consistent with the approach set out in the Statement of Community Involvement (SCI)(2019). It states within the SCI that we will publish consultation documents on-line and the preferred route for comments is via the website, because this helps make the process as efficient as possible. The SCI states the council will also consider using one or more of the following methods:

- Correspondence through letters or email
- Workshops or focus groups
- Presentations at community events
- Joint consultations
- Drop-in events, displays or exhibitions
- Meetings (one to one or group)
- Make plans available on our website and at public inspection points
- Targeted measures for hard to reach groups.

The current strategy is set within the context of Covid-19 and the global pandemic and has been adapted to take into account the current restrictions, whereby no face-to-face consultation events are planned. This is in accordance with government guidelines and there are no statutory requirements at Regulation 18 for hard copies to be placed at public libraries or the Gateway to be viewed. The majority of the consultation will be undertaken using online resources, in order to maintain social distancing rules and ensure the safety of council staff and members of the public. There will still be opportunities for engagement in other formats as well for people without internet access.

**Who will be Consulted**

An extensive consultation list has been prepared in order to ensure that comments will be sought across a broad spectrum of general consultation bodies, such as community groups, religious organisations, voluntary bodies, schools and businesses within the Dover district.

Section 110 of the Localism Act sets out the 'duty to co-operate'. This requires local planning authorities, county councils and a number of other public bodies to co-operate in relation to strategic cross-boundary matters in the preparation of development plan documents, other local development documents, and marine plans.

The duty relates to strategic matters of sustainable development or use of land that would have a significant impact on at least two local planning areas or on a planning matter that falls within the remit of a county council.

The duty requires local planning authorities to:

- engage constructively, actively and on an ongoing basis;
- set planning policies to address such issues; and
- consider joint approaches to evidence collection and plan making

In addition to our East Kent Local Authority neighbours, Ashford, Canterbury, Folkestone and Hythe, Thanet and Kent County Council, the duty to co-operate also covers a number of public bodies. These bodies are required to co-operate with Councils on issues of common concern to develop sound local plans. These bodies are currently identified in the Local Planning Regulations and the NPPF as:

- Environment Agency
- Historic Buildings and Monuments Commission for England
- Natural England
- Mayor of London
- Civil Aviation Authority
- Homes and Communities Agency
- Primary Care Trusts
- Office of Rail & Road
- Transport for London
- Integrated Transport Authorities
- Highways Authorities
- Marine Management Organisation
- Local Enterprise Partnership
- Local Nature Partnerships
- Infrastructure providers
- County Councils

Section 34 (6) of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that where a local planning authority have co-operated with another local planning authority, county council, or a body or person prescribed under section 33A of the Act, the local planning authority's monitoring report must give details of what action they have taken during the period covered by the report. We will continue to update the Annual Monitoring Report to record the requirements under the Duty to Co-operate.

## **Engagement Strategy**

There are a variety of ways in which people and groups can become involved in the preparation of the Local Plan. The minimum requirements for consultation and community engagement are set out in the Council's Statement of Community Involvement (2019). However, it is proposed that the Council is much more proactive in engaging with the local community.

The main host and vehicle for consultation documents and responses will be the Council's Local Plan website. This will contain a virtual exhibition, for key issues to be reviewed by topic, with interactive maps for the towns and settlements. The Local Plan team will also be working in conjunction with the Communications team prior to and throughout the consultation.

Table 1 sets out a comprehensive engagement strategy for the Local Plan designed to reach out to as many people and groups as possible through a variety of methods.

**Table 1: Local Plan Engagement Strategy**

<b>Stage in Plan Preparation</b>	<b>Key Issues to be Considered</b>	<b>Methods of Engagement</b>
Regulation 18 – Issues and Options	<p>At the start of the Local Plan preparation process the Council is required to notify specific groups as to the subject of the Local Plan which it intends to prepare and invite them to make representations about what a Local Plan with that subject ought to contain.</p> <p>This consultation will set out the structure of the Plan and overarching themes to be covered by the Local Plan.</p> <p>The plan will cover the following issues:</p> <ul style="list-style-type: none"> <li>• Climate Change</li> <li>• New Homes</li> <li>• Employment and the Local Economy</li> <li>• Retail and Town Centres</li> <li>• Transport and Infrastructure</li> <li>• Design</li> <li>• The Natural Environment</li> <li>• The Historic Environment</li> <li>• Development management policies</li> <li>• Site allocations</li> </ul>	<ul style="list-style-type: none"> <li>• Proposed eight week consultation period 20<sup>th</sup> January 2020 - 17<sup>th</sup> March 2020</li> <li>• Consultation documents will be made available on the Council's website, which will be the main access point for the consultation with a virtual exhibition and interactive maps outlining the key issues.</li> <li>• A public notice will be printed within the local newspaper.</li> <li>• Letters/emails will be sent informing consultees of consultation dates and how to view and respond to documents.</li> <li>• A press release will be issued advertising the consultation.</li> <li>• Article in DDC Newsletter publication.</li> <li>• Publicise the consultation throughout the consultation period on the Council's Facebook page and via Twitter and LinkedIn.</li> <li>• Produce a postcard advertising the consultation with dates, website and phone number. (Number of copies for</li> </ul>

Stage in Plan Preparation	Key Issues to be Considered	Methods of Engagement
	<p>The purpose of the Regulation 18 consultation will be to ask the local community and key stakeholders whether they agree with the issues and the preferred options set out in the consultation document and if there are any other key issues for the District that should be included in the Local Plan.</p>	<p>dissemination is currently subject to cost calculations).</p> <ul style="list-style-type: none"> <li>• A dedicated phone number will be set up principally for residents without internet access to be able to ask any questions relating to the consultation (comments to the consultation can only be received through written representation, however, by the online consultation page or in exceptional circumstances via, email or letter).</li> <li>• Hardcopy summary documents will be made available at public locations across the District and on request.</li> <li>• Posters advertising the consultation, webpage and phone number will be sent to all parish councils to be displayed and at other key locations within the district.</li> <li>• Online events will be held for members of the public as a replacement for face-to-face drop in sessions, where officers will provide a presentation and questions can be answered.</li> <li>• Stakeholder online events will be held centred around specific issues within the Draft Local Plan and briefings will be held with Parish Councils at the start of the consultation.</li> </ul>
		<ul style="list-style-type: none"> <li>•</li> </ul>

### How to comment, consideration of comments and feedback

The Council will actively encourage online responses to the consultation and the preferred means of receiving comments is through the interactive online system 'Objective' via the Council's website. Using the online form has a number of advantages, as it is the fastest and most accurate method and allows for the representations to be processed quickly and efficiently. It ensures that representations are attached to the correct section of the consultation document. It also allows respondents to provide



their own summaries to representations, which helps to avoid any risk of misrepresentation of respondent concerns.

The Council however recognises that not everyone is able to use the online consultation system, so paper copies of response forms will also be made available. Guidance notes will also be provided to aid completion of responses.

Petitions received in relation to planning applications and a development plan are an exception to the Council's wider Petition Scheme. Only the person who submits the petition will be recorded as a respondent, we will not be able to add each named signature as respondents to the consultation. We encourage individual representations to be made in response to the consultation in order to fully capture specific issues.

Following the close of the consultation all comments will be reviewed, and we will consider what changes should be made to the draft Plan to address comments received. A consultation statement will be produced to explain how comments have been taken into account, and where it has not been possible to do so, explain why.



# Dover District **Equalities Impact Assessment**

Regulation 18 Consultation on the Draft Local Plan  
December **2020**



Dover District **Local Plan**  
Supporting document



# 1. Introduction

## *The Equality Act 2010*

1.1 Under the Equality Act 2010 the Council has a legal duty when exercising public functions<sup>1</sup>, to have due regard to the three aims of the public sector equality duty; namely the need to:

- (a) Eliminate discrimination, harassment and victimisation;
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it (ie tackling prejudice and promoting understanding between people from different groups).

## *Protected Characteristics*

1.2 The Equality Act 2010 sets out nine protected characteristics for the purpose of the equality duty:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership<sup>2</sup>
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

## *Due regard*

1.3 Having 'due regard' entails using good equality information and analysis at the right time, including as part of decision-making procedures. To 'have due regard' in the case of Local Plan preparation and consultation means that the Council is required to consciously consider the need to carry out the three elements of the general equality duty, namely to eliminate discrimination, advance equality of opportunity and foster good relations, throughout all stages and elements of the preparation of the document, as well as the content of the Plan itself.

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<sup>1</sup> <http://www.legislation.gov.uk/ukpga/2010/15/section/149>

<sup>2</sup> In the case of marriage and civil partnership, only the first aim of the duty applies in relation to employment.

- 1.4 Compliance with the equality duty in this instance, can involve removing or minimising disadvantages suffered by people due to their protected characteristics, as well as taking steps to meet the needs of people with certain protected characteristics, when these are different from the needs of other people.

*Dover District Council Equality Objectives 2016 - 2020*

- 1.5 The Council has adopted the following Equality Objectives for the period 2016 – 2020. Those are relevant to the Local Plan are highlighted in **bold**.

<p>1. Develop a workforce that feels valued and reflects the diverse communities we serve. Measured by:</p> <ul style="list-style-type: none"><li>• Conducting regular Personal Performance Reviews</li><li>• Provision of training to develop skills, knowledge and experience to provide effective succession planning</li><li>• Analysis of the workforce in relation to age, gender, ethnic background and religion</li><li>• Delivery of an equality and diversity training package for all employees and members</li></ul>
<p>2. To make our services more accessible and welcoming to all communities. Measured by:</p> <ul style="list-style-type: none"><li>• <b>The use of technology and creative techniques best suited to different groups in line with the Council's digital agenda</b></li><li>• <b>Maintaining high levels of customer satisfaction, seeking feedback from our customers to identify where we can improve services</b></li></ul>
<p>3. To improve dialogue with local communities to encourage integration of people from a range of backgrounds to have an active role in the community. Measured by:</p> <ul style="list-style-type: none"><li>• The rehousing of some Syrian families in line with the Syrian Refugee Scheme</li><li>• Increased participation in disability sport and to make improvements to the district's facilities</li><li>• <b>Advertising and promotion of events and news through social media to reach all groups</b></li><li>• Providing Community Officer support during a phase of development and regeneration within the district</li><li>• <b>Continuing to hold Neighbourhood Forums to maintain interaction and engagement within the community</b></li><li>• Working in partnership with the local community to obtain external funding to improve their local areas</li></ul>

## 2. Dover District Local Plan Regulation 18 Draft: Content

- 2.1 The Regulation 18 Draft Dover District Plan sets out a bold new vision for Dover District in 2040. This vision has 17 supporting strategic objectives based on analysis of the local population, including its age structure, health and socio-economic characteristics, in addition to the housing, economic, environmental, transport and infrastructure issues facing the district. Eighteen Strategic Policies are proposed to guide the future development of the district, two Site allocation Policies and 48 Development Management Policies which will shape all development that comes forward over the plan period, which runs to 2040.
- 2.2 The vision, strategic objectives and policies priorities have been designed with due regard for the need to provide for the needs and interests of all residents of the district.

### *Prosperous Economy*

- 2.3 The Draft Plan has three strategic objectives to deliver a prosperous economy over the Plan period:
- To grow and diversify the Dover District economy by making it an attractive and competitive place to start, grow and invest in a broad range of businesses, attracting more and better jobs and attracting and retaining working age people.
  - To support opportunities to strengthen the role of Dover, Deal and Sandwich Town Centres through their diversification, enhancement and improvements to the public realm.
  - To provide a range of high-quality tourism facilities and accommodation, which facilitate the growth of the tourism sector, and encourage longer staying visits.
- 2.4 Strategic Policies SP8 and SP9 create and protect employment opportunities. Development Management Policies DM18 – DM27 seek to protect existing employment sites, enable home and remote working, improve tourist and visitor accommodation and facilities and maintain the vitality and viability of town centres in order that they can survive and fulfil the needs of all residents, including those who need shopping facilities within walking distance.
- 2.5 These policies seek to further the aims of the Public Sector Equality Duty by seeking to provide employment opportunities for all those living in the district. Existing successful employment sites are protected from alternative development ensuring that these facilities are not lost to higher value uses, while home working policies support remote working which can particularly benefit people with physical disabilities who may not otherwise be able to access employment. Ensuring vibrant successful town centres benefits whole communities as vital services can be accessed within the district and locally, reducing the need to

travel. This is beneficial for everybody but particularly for those without the means or ability to travel.

### *Vibrant Communities*

- 2.6 The Draft Plan has four strategic objectives to deliver vibrant communities over the plan period.
- To provide greater choice of high-quality housing to meet the needs of Dover District's growing population and changing demographic, and address affordability issues.
  - To focus new development at accessible and sustainable locations which can utilise existing infrastructure, facilities and services, and to ensure development contributes to the sustainability of local communities and services, supporting regeneration and wherever possible make the best use of brownfield land.
  - To ensure that new buildings and spaces are of the highest design quality, to create attractive, inclusive, healthy places which promote local distinctiveness and a sense of place.
  - To provide new and improved community infrastructure and assets, including open space and sports facilities to meet the needs of the District's communities.
- 2.7 Strategic Policies SP2, S3, SP4, SP5, SP6, SP7, Site Allocations Policy 1 and Site Allocations Policy 2, and Development Management Policies DM12 -DM17 seek to address the housing need of all groups, including the young, the elderly and gypsies and travellers, by providing for the objectively assessed need of the district.
- 2.8 Policy DM10 supports the intensification of four gypsy and traveller sites, Policy DM11 responds to the housing needs of various community groups and the emerging population trends and demographics that been assessed through the latest Strategic Housing Market Assessment for the district, while Policy DM12 requires the delivery of adequate provision of affordable housing units across new developments in the district for those who may be unfairly disadvantaged and unable to find housing accommodation when demand exceeds supply. Policy DM13 supports exception sites for housing in rural areas that addresses rural 'concealed households' and the local needs of young people and those working in agriculture who are unable to afford housing in the villages of the district. Other housing policies proposed in the Draft Plan support gypsy and traveller windfall accommodation, specific community housing needs, including those wishing to self build, and support for the living needs of mobile older persons thereby reducing the premature need to enter into care facilities.
- 2.9 With regard to the objective of delivering new building and spaces of highest design quality, Strategic Policies SP15 sets criteria for high quality and inclusive design of both buildings and related open spaces, ensuring safe and accessible access for all. In order to meet the changing needs of an increasingly aging

population in this district, Policy DM37 of the Draft Plan requires developers to consider the future needs of households when designing residential units. It requires, as a minimum, all new development to be designed to building regulation optional requirement M4 (2) accessible and adaptable dwellings. In respect of the Building Regulation optional requirement M4 (3) wheelchair user dwellings, in accordance with national guidance this can only be required on units where the local authority has nomination rights, i.e. within the affordable rented element of a development. The Plan requires this to be delivered on sites of 20 dwellings or more, where the Council will require 5% of the total dwellings to meet this standard. The plan seeks to improve the living conditions of residents by applying the national space standards ensuring appropriate liveable space and safe and accessible developments.

- 2.10 Through its housing and design policies, the Draft Plan seek to further all three aims of the Public Sector Equality Duty. In assessing overall need specific consideration has been given to the housing requirements of particular groups within the community which include individuals/groups with protected characteristics, including older people, younger people, people suffering long term illness/disability, and gypsies and travellers. By allocating sites for housing development the council is helping to ensure that residents, including those in younger age groups, have access to housing and are not unfairly disadvantaged due to inability to afford or lack of supply. By requiring/facilitating provision of specific types of homes including some which the market might not otherwise choose to deliver and by ensuring that there is an adequate dwelling mix and housing supply the Council is ensuring that the housing market is accessible for all protected groups. In requiring 30% affordable housing the Council is seeking to mitigate financial disadvantage for people with socioeconomic difficulties.
- 2.11 Finally, Strategic Policy SP13 and Development Management Policies DM31 - DM35 work to ensure that the right infrastructure, is provided in the right place, at the right time, across the district to support the scale of growth identified in the Plan. To this end the Draft Plan provides for the needs of all those living and working in the District, in relation to access to education, services and facilities and commits the Council to working with our partners to address existing deficiencies in infrastructure provision, in order to ensure the broad range of needs of the growing population are met including the requirements of the digital economy for superfast broadband connections and good coverage across the District.
- 2.12 The Draft Plan also address the need, through development management policies DM31, DM32 and DM33 to improve the provision of good quality sports facilities and a better network of public open space, to increase participation in sports and physical activity, particularly among children and young people, in order to tackle obesity and improve health and well-being, and to increase accessibility, ensuring public open spaces are adaptable and capable of accommodating multiple uses. Further, the Draft Plan recognises that valued open spaces within the District need to be retained and protected for the health and well-being of all residents.

- 2.13 These policies seek to further all three aims of the Public Sector Equality Duty by ensuring that areas of open space, countryside and recreational opportunities are provided which are accessible to all, to help improve people's quality of life and sense of well-being and by helping to create a healthier environment for all residents of Dover district.

#### *Spectacular and Sustainable Environment*

- 2.14 The Draft Plan has six strategic objectives to protect and enhance the spectacular natural and historic environment of the district over the plan period:
- To respond to the challenges of climate change, ensuring new development is resilient to, and mitigates against the effects of climate change, including by reducing carbon emissions, and designing development that is resilient to the effects of climate change.
  - To manage flood risk sustainably in a way that ensures the safety of residents and property and take opportunities to reduce flood risk where possible.
  - To conserve or enhance the designated and undesignated heritage assets of the District in a manner appropriate to their significance, recognising their intrinsic value as a finite resource as well as their contribution to the character of the District and their positive role in regeneration of the District.
  - To conserve and enhance the district's biodiversity, including all designated wildlife sites and priority habitats and to enhance ecological connectivity between them, delivering a net gain in biodiversity.
  - To conserve and enhance the District's important natural landscapes and water environments, to ensure these assets can continue to be experienced and valued by residents and visitors and are protected from inappropriate development.
  - To ensure the District's natural resources are used prudently, waste is minimised, and environmental pollution is reduced or avoided.
- 2.15 Strategic Policies SP1, SP16, SP17 and SP18 and development management policies DM1 – DM9, and DM38 – DM48 seek to deliver these strategic objectives.
- 2.16 The opening chapter of the Draft Plan focuses on planning for climate change, a priority which underpins the plan as a whole. Policies DM1 – DM9 set out how all development coming forward over the lifetime of the Plan will be required to adapt to and mitigate against the effects of climate change, including through renewable energy measures and infrastructure, managing flood risk, and by encouraging sustainable modes of transport and water efficiency.
- 2.17 Strategic Policies SP16 and SP17 protect the natural environment of the district for residents and visitors, focusing in particular on the hierarchy sites of national and international importance for wildlife (also protected by Policy DM40), valued



landscapes including the Kent Downs AONB (Policy DM39), green infrastructure, air quality (Policy DM41) and water supply and quality (Policy DM42 and DM43) . Policy DM38 advances the delivery of a Biodiversity Net Gain of at least 10% in all developments coming forward over the plan period. Strategic Policy SP18 protects Dover's heritage assets, with Policies DM44, DM45, DM46, DM47 and DM48 providing policy support for the various categories and components of the rich and wide-ranging historic landscape of the district.

- 2.18 These policies seek to further all three aims of the Public Sector Equality Duty by working to ensure that the district is resilient to the effects of climate change over the Plan period and conserving and enhancing the accessible and high quality countryside and heritage areas of the district for all groups to enjoy.

### *Cross Cutting Issues*

- 2.19 Finally, there are four strategic objectives of the Plan which deliver issues which cut across the eight themed chapters of the Draft Plan:

- To support improvements in the health and wellbeing of residents, improve quality of life for all and reduce health inequalities.
- To improve connectivity and movement through significantly enhancing the provision of sustainable modes of transport and delivering improvements to the local and strategic road network.
- To ensure infrastructure is delivered, in a timely manner, to support the needs of new and existing communities in the District.
- To work with the Council's partners to ensure that the social, environmental and economic impacts of new developments are mitigated, and that the benefits of new development are captured, to protect the District's people and places

- 2.20 Strategic Policy SP13 provides a policy framework for healthy and inclusive communities by ensuring new community infrastructure, including schools and medical facilities, is provided alongside new development. Strategic Policy SP14 and development management policies DM4, DM29 and DM30 address transport infrastructure for new development with the aim of improving accessibility particularly by sustainable means of transport, supporting safe, efficient and environmentally suitable use of the highway network and working to ensure that a suitable level of car parking is provided in new developments.

- 2.21 These policies seek to further all three aims of the public sector equality duty and are responsive to issues including people with limited mobility, energy and awareness, people unable to access/afford travel by private car, in addition to addressing the needs of some protected groups (including age and disability) which may be reliant on the use of private cars. The duty is followed by policies which require that every-day travel by various modes of transport is accessible to all, with specific regard to the protected groups, and create opportunities to access services and job opportunities.

### 3. Dover District Local Plan Regulation 18 Draft: Preparation and Consultation

#### *Dover District Local Plan Regulation 18 Draft*

- 3.1 The Dover District Local Plan Regulation 18 Draft is the first draft of Council's new Local Plan for the District. This Local Plan will replace the existing Core Strategy (2010) and Land Allocations Local Plan Local Plan (2015).
- 3.2 A Local Plan sets out a vision and a framework for the future development of the area. It addresses the needs and opportunities for housing, the local economy, community facilities and infrastructure, as well as establishing the basis for conserving and enhancing the natural and historic environment of the district, mitigating and adapting to climate change, and achieving well designed places. The Local Plan is at the heart of the planning system and provides the framework for all planning decisions to be judged against.

#### *What have we done so far?*

- 3.3 Producing and consulting on the Draft Plan (known in this instance as a Regulation 18 Draft) provides an opportunity for local residents, businesses, community, amenity and interest groups, as well as statutory consultees (collectively referred to as local stakeholders), to
  - shape the future development of Dover District,
  - input into the Plan preparation, and
  - to identify any key issues that they feel need to be addressed.
- 3.4 Community and stakeholder engagement in this process has been encouraged through a range of methods, in order that the final draft of the Plan (known as the Regulation 19 Submission Local Plan), which will be submitted to Government for examination in 2021, reflects the opinions and interests of as many local stakeholders as possible.
- 3.5 To date, we have carried out a series of stakeholder workshops which have helped to inform the key issues that the Plan needs to address. Targeted stakeholder consultation has also been undertaken on specific issues to inform the Draft Plan for consultation. In addition, we have liaised with our neighbouring authorities under the duty to co-operate in order to arrive at agreed statements of common ground in relation to cross border issues. Details of such consultations are set out in the Consultation Strategy that accompanies the Regulation 18 Draft Plan.

### *Regulation 18 Draft Consultation January - March 2021*

- 3.6 The Draft Dover District Local Plan (Reg 18) will be published for an eight week period of consultation running from 20<sup>th</sup> January 2021 - 17<sup>th</sup> March 2021.
- 3.7 An extensive consultation list has been prepared in order to ensure that all residents and a broad spectrum of bodies, including community groups, religious organisations, voluntary bodies, schools and businesses within the Dover district are aware of the consultation exercise and are able to make their views known on its contents and proposals. Representations are being sought from all those living, and with an interest, in the district, in line with the Public Sector Equality Duty.
- 3.8 Following the end of the consultation period, officers will review and respond to all representations received. Responses will be publicly available. This consultation exercise will help inform the development of the submission draft Local Plan.
- 3.9 This Regulation 18 Draft consultation is consistent with both the approach set out in the Council's adopted Statement of Community Involvement (SCI) (2019) and the Public Sector Equality Duty. The SCI states that the Council will publish consultation documents on-line and that the preferred route for comments is via the website, as this helps make the process of analysing and responding to representations as efficient as possible. The SCI states the Council will consider using one or more of the following methods:
- Correspondence through letters or email
  - Workshops or focus groups
  - Presentations at community events
  - Joint consultations
  - Drop-in events, displays or exhibitions
  - Meetings (one to one or group)
  - Make plans available on our website and at public inspection points
  - Targeted measures for hard to reach groups.
- 3.10 The SCI predates the events of 2020 however, and this consultation is now having to be undertaken within the context of Covid-19 and the global pandemic. It therefore has had to be adapted to take into account the current restrictions on social interaction and the requirement on vulnerable groups to shield at home. In particular, no face-to-face consultation events are possible, in accordance with government guidelines at the time of writing. In addition, it is not appropriate for hard copies to be placed at public libraries or the Gateway to be viewed due to concerns surrounding a contagious virus.
- 3.11 The majority of the consultation will therefore be undertaken using online resources, in order to maintain social distancing rules and to ensure the safety of council staff and members of the public. However, the Council is ensuring that

there will still be opportunities for engagement via other formats, in particular for people without easy internet access.

### *Consultation methodology*

- 3.12 Consultation documents will be made available on the Council's website, which will be the main access point for the consultation, with a virtual exhibition and interactive maps outlining the key issues on a parish by parish basis. A public notice will be printed within the local newspaper and letters/emails will be sent informing consultees of consultation dates and how to view and respond to documents.
- 3.13 A press release will be issued advertising the consultation which will also be publicised throughout the consultation period on the Council's Facebook page and via Twitter. A postcard will be produced to be circulated to all residential address points within the District, with consultation dates, website and a phone number. A dedicated phone number will be set up principally for residents without internet access to be able to ask any questions relating to the consultation. Representations on the Draft Plan, which can only be made through written representation, will be accepted via the online consultation page, or in exceptional circumstances, by email or letter.
- 3.14 Due to the restrictions caused by the pandemic, hardcopies of the Draft Plan will not be available for inspection in the libraries of the district as is customary, Instead, a printed summary document will be produced and will be made available to take away from Dover, Deal and Sandwich public libraries and the mobile library, and on request. Posters advertising the consultation, webpage and phone number will be sent to all parish councils to be displayed on their noticeboards and will be placed at other key locations within the district.
- 3.15 An online event will be held for members of the public as a replacement for face-to-face drop-in sessions, where officers will provide a presentation and questions can be answered. Stakeholder online workshops will also be held centred around specific issues within the Draft Local Plan.
- 3.16 The proposed components and methodology of the Regulation 18 Local Plan consultation exercise are accessible to all stakeholders. Specific efforts, including the distribution of postcards to all addresses in the district, have been made to ensure that those without access to online material are made aware of the consultation exercise and can participate in it. The range of consultation methods provides equality of opportunity, including persons who share a relevant protected characteristic and persons who do not share it, and work to eliminate discrimination, advance equality of opportunity and foster good relations with the residents of the district and users of the planning service of the Council.
- 3.17 In this way, the consultation exercise and its methodology, as outlined above, are compliant with the Public Sector Equality Duty and work to deliver, Objective 2 and Objective 3 of the District Council's Equality Objectives 2016-2020.

### *What happens next?*

- 3.18 Following the end of the consultation all responses received will be considered and reviewed. Based upon these responses a final draft of the Plan (known as a Regulation 19 Submission Plan) will be prepared and will be subject to further consultation prior to submission for examination.