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24 September 2012

To the Members of the Council,

You are hereby summoned to attend an **EXTRAORDINARY** meeting of the **COUNCIL** to be held in the Council Chamber - Whitfield at these Offices on Wednesday 3 October 2012 at 6.00 pm for the transaction of the business set out in the Agenda.



Chief Executive

Members of the Council:

S R Nicholas (Chairman)	M R Eddy	K E Morris
P S Le Chevalier (Vice-Chairman)	R J Frost	M J Ovenden
N J Collor	B Gardner	A S Pollitt
J S Back	J H Goodwin	J A Rook
B W Bano	D Hannent	M A Russell
T J Bartlett	P J Hawkins	F J W Scales
P M Beresford	P G Heath	D G Smallwood
T A Bond	G J Hood	A R Smith
P M Brivio	S J Jones	C J Smith
B W Butcher	L A Keen	J M Smith
P I Carter	N S Kenton	R J Thompson
S C Chandler	S M Le Chevalier	J F Tranter
M D Conolly	G Lymer	R S Walkden
G Cowan	S C Manion	P Walker
J A Cronk	K Mills	P A Watkins

AGENDA

1 **APOLOGIES**

To receive any apologies for absence.

2 **DECLARATIONS OF INTEREST**

To receive any declarations of interest from Members in respect of business to be transacted on the agenda.

Where a Member has a new or registered Disclosable Pecuniary Interest (DPI) in a matter under consideration they must disclose that they have an interest and, unless the Monitoring Officer has agreed in advance that the DPI is a 'Sensitive Interest', explain the nature of that interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a DPI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation permitting them to do so. If during the consideration of any item a Member becomes aware that they have a DPI in the matter they should declare the interest immediately and, subject to any dispensations, withdraw from the meeting.

Where a Member is declaring an Other Significant Interest (OSI) they must also disclose the interest and explain the nature of the interest at the meeting. The Member must withdraw from the meeting at the commencement of the consideration of any matter in which they have declared a OSI and must not participate in any discussion of, or vote taken on, the matter unless they have been granted a dispensation to do so or the meeting is one at which members of the public are permitted to speak for the purpose of making representations, answering questions or giving evidence relating to the matter. In the latter case, the Member may only participate on the same basis as a member of the public and cannot participate in any discussion of, or vote taken on, the matter and must withdraw from the meeting in accordance with the Council's procedure rules.

3 **THE LOCAL AUTHORITIES (EXECUTIVE ARRANGEMENTS) (MEETINGS AND ACCESS TO INFORMATION) (ENGLAND) REGULATIONS 2012** (Pages 4 - 11)

The Governance Committee at its meeting on 27 September 2012 considered the attached report of the Director of Governance upon the Rules for Substitutes on the Planning Committee, Regulatory Function Committees and Other Committees.

The Governance Committee recommendation will be circulated at the meeting.

4 **RULES FOR SUBSTITUTES ON THE PLANNING COMMITTEE, REGULATORY FUNCTION COMMITTEES AND OTHER COMMITTEES** (Pages 12 - 22)

The Governance Committee at its meeting on 27 September 2012 considered the attached report of the Director of Governance upon the Rules for Substitutes on the Planning Committee, Regulatory Function Committees and Other Committees.

The Governance Committee recommendation will be circulated at the meeting.

5 **REVIEW OF THE EAST KENT ARRANGEMENTS** (Pages 23 - 33)

The Cabinet at its meeting on 1 October 2012 considered the report of the Director of Governance (circulated separately) upon the Review of the East Kent Arrangements.

The Cabinet recommendation will be circulated at the meeting.

6 **URBAN RENEWAL - PROPOSALS FOR THE DEVELOPMENT OF NEW HOUSING ON COUNCIL OWNED LAND** (Pages 34 - 46)

The Cabinet at its meeting on 1 October 2012 considered the report of the Director of Environment and Corporate Assets (circulated separately) upon the Urban Renewal – Proposals for the Development of New Housing on Council Owned Land.

The Cabinet recommendation will be circulated at the meeting.

7 **LAND ALLOCATIONS PRE-SUBMISSION LOCAL PLAN** (Pages 47 - 1320)

The Cabinet at its meeting on 1 October 2012 considered the report of the Director of Regeneration and Development (circulated separately) upon the Land Allocations Pre-Submission Local Plan.

The Cabinet recommendation will be circulated at the meeting.

Access to Meetings and Information

- Members of the public are welcome to attend meetings of the Council, its Committees and Sub-Committees. You may remain present throughout them except during the consideration of exempt or confidential information.
- All meetings are held at the Council Offices, Whitfield unless otherwise indicated on the front page of the agenda. There is disabled access via the Council Chamber entrance and a disabled toilet is available in the foyer. In addition, there is a PA system and hearing loop within the Council Chamber.
- Agenda papers are published five clear working days before the meeting. Alternatively, a limited supply of agendas will be available at the meeting, free of charge, and all agendas, reports and minutes can be viewed and downloaded from our website www.dover.gov.uk. Minutes are normally published within five working days of each meeting. All agenda papers and minutes are available for public inspection for a period of six years from the date of the meeting. Basic translations of specific reports and the Minutes are available on request in 12 different languages.
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Large print copies of this agenda can be supplied on request.

Subject: THE LOCAL AUTHORITIES (EXECUTIVE ARRANGEMENTS) (MEETINGS AND ACCESS TO INFORMATION) (ENGLAND) REGULATIONS 2012

Meeting and Date: Governance Committee – 27 September 2012
Extraordinary Council – 3 October 2012

Report of: David Randall, Director of Governance and Monitoring Officer

Classification: Unrestricted

Purpose of the report: To advise of the coming into force of The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 and to ask the Council to make appropriate changes to the Council's Constitution

Recommendation:

- (1) That it be noted that the Access to Information Procedure Rules incorporated within the Council's Constitution will need to be amended.
- (2) That the Director of Governance be requested to submit a revised text for the Access to Information Procedure Rules to a future meeting of the Governance Committee and the Council.
- (3) The amendments to the Constitution set out in Appendix 1 relating to Strategic Management Team be adopted.

1. Summary

1.1 The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 came into force on 10 September 2012. These Regulations replace The Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2000 and make changes to the law with regard to public access to meetings of the executive, access to information and the recording of executive decisions. It is necessary for the Council to amend its Constitution in order to bring it into line with the new legal requirements.

2. Introduction and Background

2.1 Those parts of the Council's Constitution which make provision for public access to meetings of the executive, access to information considered at those meetings and the recording of decisions, notably the Access to Information Procedure Rules give effect to the requirements of the Local Government Act 2000 and regulations made under it with regard to these matters. The government, at short notice and with limited consultation, has introduced new regulations which came into force on 10 September 2012.

2.2 The Secretary of State has said that he has made these changes in the interests of openness and transparency. The Government and Communities ('CLG') press release about the changes can be viewed at: <http://www.communities.gov.uk/news/newsroom/2204300>. Another view is that the

draftsmen of the regulations have (perhaps inadvertently) implemented nightmarish changes which will only serve to increase bureaucracy and provide to significantly slow down the decision making process without making the groundbreaking changes in terms of openness and transparency which the Secretary of State claims.

- 2.3 The regulations can be viewed at <http://www.legislation.gov.uk/ukxi/2012/2089/made>
- 2.4 On the face of them these regulations have significant effects although their drafting is not entirely clear. The principal changes are set out in the following paragraphs of this report.

3. **Private Meetings of the Executive**

- 3.1 The most significant change is that it is no longer possible for there to be private meetings of the executive as was permitted under the 'old' rules. All that will be possible is for there to be public meetings from which the press and public are excluded for items where confidential or 'exempt' information would otherwise be disclosed. The language of the new regulations is not particularly accessible but the parliamentary draftsmen appear to have conflated the concepts of meeting in private with the usual practice (with which members are well familiar) of excluding the press and public when confidential or exempt items of business are to be discussed. Further, there is now no concept of briefing meetings being necessary without the public being present which was an express feature of the earlier regulations.
- 3.2 Although this is a significant change in terms of the law there will be little or no practical impact arising from this change on Dover District Council. This is because the Council has rarely availed itself of the facility which was previously available to hold private meetings of the executive.
- 3.3 A number of authorities that have been in the practice of holding so called 'informal meetings of the executive' are having to fundamentally reassess the legality of continuing to do so. Such meetings have never been a feature of the governance arrangements of Dover District Council. The closest that this Council's governance arrangements get to such a meeting is the concept of the Strategic Management Team. However, this has never been an informal meeting of the executive in the sense that it has been in some other authorities. Rather, it has been an opportunity for the Leader and portfolio holders to meet with the Chief Executive, members of the Corporate Management Team and other supporting officers on an informal basis to discuss matters of common interest. It is considered that there is a continuing need for such a forum in the interests of the efficient and effective co-ordination of the authority's functions. In the light of the legislative changes it is thought appropriate to review the role of the Strategic Management Team lest there is any confusion as to its status. Appendix 1 sets out the constitutional changes which are necessary to abolish the Strategic Management Team and to replace it with a Leadership Forum the purpose of which will be to:
- facilitate discussions on general or particular issues or enable clarification of matters between Leader, the Chief Executive, members of the executive and members of the Corporate Management Team
 - assist in settling the Notice of Forthcoming Key Decisions.
 - assist in identifying items for consideration at future meetings of the Cabinet.

4. Notice of Meetings from which the Press and Public will be Excluded.

- 4.1 The new regulations impose a rather laborious process of giving advance notice of an executive meeting at which any confidential or exempt business will be discussed. The requirement is to give 28 clear days notice of any meeting at which such business will be discussed. This has to be repeated five clear days before the meeting and consideration has to be given to any public representations as to whether a particular part of the meeting will be held in public. If these requirements cannot be met and the matter is urgent, the press and public can still be excluded if, and only if, the prior consent of the appropriate Scrutiny Chairman is obtained. Apart from the lengthening of the decision making process another practical effect of this is that if a matter arises unexpectedly, where for example the executive may suddenly need to take legal advice during a meeting and wish to exclude the press and public, then it can only take such advice in private if it has the consent of the chairman of the appropriate Scrutiny Committee. If it fails to get such consent, the item must be deferred to another meeting. Therefore, there will need to be arrangements in place for that chairman to be available on the telephone, just in case.
- 4.2 The issue of 'clear days' has been the subject of debate amongst legal practitioners. The issue is where or not this means excluding Saturdays, Sundays and bank holidays. This is significant because the 28 days notice requirement for identifying confidential and exempt items turns into virtually six weeks if these days are excluded. For many years a convention or working practice of excluding Saturdays, Sundays and bank holidays has prevailed. This stems from a misunderstanding of the effect of an old 19th century case which, in any event, was decided at a time when, because offices were not open for business, documents could not be inspected. As most notices under the regulations now require documents to be posted on the Council's website it becomes arguable as to whether 'clear days' should still be regarded as excluding Saturdays, Sunday's and Bank Holidays. In an opinion recently obtained by the Association of Council Secretaries & Solicitors (ACSeS) from Mr Clive Sheldon QC, Mr Sheldon concludes that in the case of the 28 day period at least, Saturdays, Sundays and Bank Holidays can be included.

5. The Forward Plan

- 5.1 The old style Forward Plan of Key Decisions has gone. The phrase "Forward Plan" is no longer used in the regulations. The Regulations now just talk of publishing 'a document' at least a month before an executive meeting identifying which Key Decisions are to be made at that meeting and containing prescribed information. It is no longer the specific obligation of the Leader to publish this documents but a Key Decision cannot be taken "until a document has been published". It is proposed that this document is called a "Notice of Forthcoming Executive Decisions".
- 5.2 The regulations still make provision for Key Decisions to be taken which have not been included in the "Notice of Forthcoming Executive Decisions". As previously, these provisions are referred to as the "General Exception" and the "Special Urgency" procedure. There are however changes to the detail of the procedure which require the publishing of notices on the Council's website.
- 5.3 The regulations provide for the Leader to submit to the Council, at such intervals as the Council determines, a report containing details of each executive decision taken since the submission of the last report where the making of the decision was agreed as urgent under the special urgency procedure. That report must include particulars of each decision made and a summary of the matters in respect of which each decision was made. The Leader or elected mayor must submit at least one such

report annually. The previous regime required such a report to be submitted within a prescribed period of every 3 months.

6. Recording of Executive Decisions Made by Officers

6.1 Perhaps the most controversial amendment made by the regulations is that relating to decisions made by officers which are executive decisions.

6.2 Regulations 13(4) provides that "As soon as reasonably practicable after an officer has made a decision which is an executive decision, the officer must produce a written statement which must include" certain prescribed details. For these purposes "executive decision" means a decision made or to be made by a decision maker in connection with the discharge of a function which is the responsibility of the executive.

6.3 The concern is that officers will have to make written statements for every decision which they make in connection with the discharge of an executive. Under the previous regulations officers only had to record "Key Decisions".

6.4 The concern is such that the District Council's Network has written to DCLG complaining that there has been no formal consultation exercise undertaken in connections with the regulations and stating:

"It is with grave concern I bring to your attention the significant additional burden that will be placed on local authorities as a result of their passing. This seems to be totally at variance with the CLG's own campaign to reduce regulatory burdens on local authorities. Not all of the Regulations are inappropriate but Part 4 Regulation 13 will tie up local authorities in completely unnecessary processes and reduce efficiency.

This Regulation [Reg 13(4)] requires a record to be kept of every executive decision by an officer, which prescribed information to be kept. In essence this covers every single decision made (excluding non-executive functions such as personnel issues, elections and regulatory matters) including the purchase of paper clips or indeed the decision to write a letter in response to a complaint about the level of a service. There are hundreds if not thousands of such decisions made every week in every local authority. Authorities have standing orders that govern expenditure and contracts and officers work in that control framework. To create this additional burden coupled with the reduction in available funding will mean important business will not get done in a reasonable manner. This provision alone has the capacity to set local government efficiency back many years."

6.5 The Local Government Lawyer has reported that CLG's response to this was to the effect that the regulations do not apply to officer decisions but only to Cabinet decisions. This is patently and incorrect interpretation of the law.

6.6 The regulations are completely unworkable as drafted, as compliance will not be possible in all cases. Specialist lawyers in the local government field have been attempting to interpret the regulations so as to make them workable. In the opinion obtained from Clive Sheldon Q.C. by ACSeS, Mr Sheldon advises:

"It seems to me that the definition of an 'executive decision' is broad, as it is not confined to decisions that 'discharge . . . a function' of an executive, but include decisions *'in connection with the discharge'*.

The term 'in connection with' is a somewhat flexible one, as it could mean 'closely' connected to, or 'remotely' connected to, the discharge of an executive function. In my view, it would be appropriate for councils to adopt the former definition. It is unlikely to have been Parliament's intention that any decision taken by an individual officer that had any (however remote) connection with an executive function had to be explained in a written statement, and then made available for inspection by the public. This would impose a burden on councils without any obvious benefit.

Accordingly, I consider that purely administrative decisions – such as purchasing stationery for use in connection with the discharge of an executive function – would not need to be recorded under regulation 13. Such decisions are only tenuously connected with the discharge of the executive function.

Nevertheless, other decisions which may be fairly routine, but are closely connected to the functions of the executive will need to be recorded. I appreciate that this may be regarded by some as imposing a disproportionate burden on councils. If so, then it is something that ACSeS may wish to take up with the Department with a view to amending the 2012 Regulations at the first available opportunity.

- 6.7 It will be noted that in an attempt to read the regulations so as to make them more workable, counsel seeks to introduce a distinction between officer decisions which are 'closely' connected to the discharge of an executive function and those which are only 'remotely connected'. Although a valiant attempt, this distinction does not appear on the face of the regulations and, even if the argument is sustainable, it still leaves an impractical number of decisions to be recorded.
- 6.8 Only time will tell whether CLG eventually recognise the concerns that have been expressed and respond with amending legislation. Unless and until that happens however, members and officers will need to recognise that some degree of non-compliance is inevitable. In the meantime The Director of Governance and Monitoring Officer and the Solicitor to the Council will work with the Corporate Management Team and officers to identify on a risk assessed basis those types of officer decisions which will be recorded as a matter of course. Clearly, these will include "Key Decisions".

7. **Other Changes**

- 7.1 The regime for the inspection of documents following decisions is also changed. Information that merely had to be available previously, must now be on the website. Background papers must now be published on the website as a matter of course - Regulation 15. Compliance with this requirement may prove burdensome.
- 7.2 The additional rights of access to documents for members of local authority have also changed - see Regulation 16. Documents within the control of the executive which contain material relating to any business to be transacted at a public meeting must be available for inspection by all members at least 5 days before the meeting. Previously, they only had to be available when the meeting concludes. If it has not been possible to comply with the new rules, the document must be available within 24 hours of the meeting concluding.

7.3 Where a member of an overview and scrutiny committee requests a copy of a document which is in the possession or control of the executive, there is now a requirement to provide it within 10 clear days of the date of the request.

8. **Identification of Options**

8.1 The regulations represent the law of the land and the Council has no option other than to comply with them. The only element of 'choice' relates to the frequency with which the executive leader is required to report to the full council on the use of the special urgency procedure.

8.2 The Council will, in due course need to amend its Constitution to reflect the changes which are required by the regulations. Although work has commenced on this, the Director of Governance has not attempted to complete the task in time for this meeting of the Governance Committee. This is primarily because of the uncertainty which surrounds the interpretation of some of the regulations and the likely response of CLG. It is hoped that over the course of the coming weeks a national consensus of the interpretation and impact of the regulations will emerge and that DCLG will initiate a legislative response to the predicament in which it has placed local authorities. Notwithstanding that the required constitutional changes will not keep pace with the changes required by the regulations, the Council will of course comply with the regulations as if their requirements were set out in the Constitution itself.

9. **Evaluation of Options**

9.1 The Council has hitherto received reports of the use of the Special Urgency Procedure at three monthly intervals notice. This has proved workable and there is not obvious or compelling benefit in changing this.

10. **Resource Implications**

10.1 The Director of Governance and Monitoring Officer and the Solicitor to the council are working with the Corporate Management Team, colleagues within the County and professional bodies to examine whether it is possible to interpret the requirements of the regulations so as to enable the Council to operate within reasonable bounds. If these attempts fail a consequential growth in the number of democratic services officers can be anticipated.

11. **Appendices**

Appendix 1 – Amendments to the Constitution with regard to the Strategic Management Team.

12. **Background Papers**

None.

Contact Officer: Harvey Rudd, Solicitor to the Council

Amendments To The Constitution With Regard To The Strategic Management Team.

Note: Deleted Text is shown in 'strikethrough', thus: ~~Text~~
Added text is shown underlined, thus, Text

Amend Article 7 by deleting Article 7.09 as follows:

~~7.09~~ **Strategic Management Team**

~~Strategic Management Team comprises the Leader and the Cabinet and the Chief Executive and Corporate Management Team.~~

~~In exercising its leadership role, and as part of any effective working arrangements, it is necessary for the executive to meet from time to time with members of the Corporate Management Team outside formal meetings of the executive.~~

~~A Strategic Management Team has therefore been formed to enable regular and scheduled briefings to take place between members of the executive and Corporate Management Team. Also see Executive Procedure Rule 2.7.~~

Amend Article 12 as follows:

- (e) **Corporate Management Team.** The Corporate Management Team shall comprise the Chief Executive (and Head of Paid Service), Director of Governance, Director of Finance, Housing and Community, Director of Regeneration and Development and Director of Environment and Corporate Assets.

The Corporate Management Team is not a decision making body and its meetings will not be held in public

(f) **Leadership Forum**

The Leadership Forum comprises the Leader, the Chief Executive, members of the executive, members of the Corporate Management Team and supporting officers.

In exercising their respective leadership roles, and as part of any effective working arrangements, it is necessary for the Leader and the Chief Executive to meet informally from time to time with members of the executive and members of the Corporate Management Team.

A Leadership Forum will therefore be held to enable regular and scheduled discussions to take place between members of the executive and members of the Corporate Management Team.

The purpose of the Leadership Forum is therefore to

- facilitate discussions on general of particular issues or enable clarification of matters between Leader, the Chief Executive, members of the executive, members of the Corporate Management Team

- ~~_____ • _____ assist in settling the Notice of Forthcoming Key Decisions.~~
- ~~_____ • _____ assist in identifying items for consideration at future meetings of the Cabinet.~~

The Leadership Forum is not a decision making body and its meetings will not be held in public.

Amend the Leader and Executive Procedure rules by deleting rule 2.7

~~2.7 Strategic Management Team~~

- ~~_____ (a) _____ Article 7 includes a description of the Strategic Management Team.~~
- ~~_____ (b) _____ The purpose of the Strategic Management Team is to enable regular and scheduled briefings to take place between members of the executive and Corporate Management Team outside of formal meetings of the executive.~~
- ~~_____ (c) _____ The role of Strategic Management Team is therefore to
 - ~~_____ • _____ facilitate briefings or discussions on particular issues or enable clarification of matters between the Leader and Cabinet and Corporate Management Team~~
 - ~~_____ • _____ assist the Leader in settling the Forward Plan~~
 - ~~_____ • _____ assist the Leader in settling agendas for meetings of the Cabinet.~~~~
- ~~_____ (d) _____ Strategic Management Team is not able to make collective executive decisions. Such decisions can only be made by Cabinet or, where appointed, a committee of Cabinet.~~
- ~~_____ (e) _____ Meetings of Strategic Management team will not be held in public. However, Regulation 7 of the Local Authorities (Executive Arrangements) (Access to Information) (England) Regulations 2000 provides that if a meeting of members of the executive with officers present wishes to consider a key decision which the Forward Plan indicates will be taken by the executive within the next 28 days such a meeting can only take place in public.~~

Subject: RULES FOR SUBSTITUTES ON THE PLANNING COMMITTEE, REGULATORY FUNCTION COMMITTEES AND OTHER COMMITTEES

Meeting and Date: Governance Committee – 27 September 2012
Extraordinary Council – 3 October 2012

Report of: David Randall, Director of Governance

Classification: Unrestricted

Purpose of the report: To review the rules governing the arrangements for appointing substitute members on Committees of the Council.

Recommendation: That it be recommended to the Council that Council Procedure Rule 4 (3) be deleted and replaced with a new 4(3) as follows:

"For each committee, with the exception of the Cabinet, the Council will allow the same number of substitutes in respect of each political group as that group holds ordinary seats on that committee."

1. Summary

The Leader of the Council has requested that the rules concerning the number of substitutes that can be used on a committee be reviewed with a view to introducing increased flexibility in the use of substitutes while still maintaining the required level of knowledge and expertise where appropriate.

2. Introduction and Background

Why does the Council have substitutes?

- 2.1 The primary purpose of appointing substitute members is to ensure at a basic level that a committee can achieve a functioning quorum of members in order to transact its business. However, it also serves to preserve the political proportionality of an individual committee which in turn is a reflection of the political proportionality of the authority as a whole.

What is the constitutional and legal basis for substitutes?

- 2.2 The rules governing the use of substitute members are set out in the Council Procedure Rules contained within the Council's Constitution. The current constitution is based on the Modular Constitution for English Local Authorities issued in 1999 by the former Office of the Deputy Prime Minister. Rule 4 (Appointment of substitute members of committees and sub-committees) of the Modular Constitution contains both statutory and non-statutory provisions and states:

"The Local Government Act 2000 does not allow for substitute or co-opted members of an executive but Councils may wish to consider the appointment of substitute members to other committees. The legal basis for substitute member schemes has been considered by a number of apparently conflicting counsels' opinions over the years. A definitive

view cannot be given until either the issues are tested in court or covered by legislation and Councils are advised to take their own legal advice on the issue."

- 2.3 In accordance with the Local Government Act 2000, the Council's Constitution does not allow for substitute members on the Cabinet and nothing in this report seeks to change this arrangement. In addition, members of Executive Committees may appoint substitutes from amongst the Cabinet only. For obvious reasons, no provision is made for substitutes at Council meetings.
- 2.4 In reviewing the arrangements for the appointment of substitute members, it is clear that the Modular Constitution upon which the Council's Constitution is based did not prescribe the arrangements under which non-executive substitutes could be appointed, leaving that decision to individual authorities. As a consequence, this report seeks to consider all options open to the Council.
- 2.5 The Council Procedure Rules permit substitutes on all committees other than the executive / council and the rules used for this are based upon the practices adopted in the pre-2002 Modular Constitution Standing Orders.
- 2.6 The Standing Orders of the Council largely reflected the contents of the Model Standing Orders Proceedings and Business of Local Authorities (2nd Edition) issued by the then Ministry of Housing and Local Government in 1963 and reprinted by HMSO in 1973. The arrangements governing the appointment of substitute members were added to the Standing Orders by the Policy and Resources Committee at its meeting held on 6 April 1999. Initially adopted for a six month trial period the rules governing the appointment of substitute members were permanently codified in November 1999 as Standing Order 34, set out as follows:
- (1) *A full member of a Committee, Sub-Committee or Working Group who is unable to attend a meeting and wishes a substitute member to attend the meeting in his/her place, shall make the necessary arrangements with any other member of his/her political group and shall either give, or arrange for the nominated substitute member or any other member of his/her political group, to give notice of the substitution before the time when the meeting is to commence, either in written or oral form to the Committee Officer named on the agenda.*
 - (2) *In no case shall the number of Substitute Members appointed by a political group to a Committee, Sub-Committee or Working Group exceed one third of the number of seats allocated to the political group calculated to the nearest whole number save that each political group shall have the right to appoint at least one Substitute Members in all cases.*
 - (3) *The effect of a valid notice of substitution (whether written or oral) shall be that the full member shall cease to be a member of the Committee, Sub-Committee or Working Group (as the case may be) for the duration of that meeting (and for the duration of any adjournment of that meeting) and that the substitute member shall be a full member of the Committee, Sub-Committee or Working Group (as the case may be) for the same period; and that the full member shall resume membership of that Committee, Sub-Committee or Working Group after the conclusion of that meeting (including any adjournment thereof).*

- (4) *A valid notice of substitution (whether written or oral) once given in respect of a meeting of a Committee, Sub-Committee or Working Group may not be revoked in respect of such meeting or any adjournment of it.*
- (5) *The Chairman of the Committee, Sub-Committee or Working Group (as the case may be) shall announce the appointment of any substitute members made in accordance with this Standing Order at the commencement of the meeting.*
- (6) *In the event of the Chairman of a Committee, Sub-Committee or Working Group being absent and appointing a substitute member to attend in his/her place, the substitute member may only act as an ordinary member and will not assume any rights of the full member to act as Chairman (and in such event the normal rules as to the Vice-Chairman taking the chair will apply). In the absence of both the Chairman and Vice-Chairman from a meeting (and the appointment of substitute members to attend in their place) the meeting shall appoint a Chairman for the meeting who may be drawn from any members (including any substitute member) present and with voting rights.*
- (7) *No substitute members may be appointed in respect of the following bodies:-*

Audit and Performance Review Sub-Committee (in cases where it is conducting hearings under the Complaints Procedure)

Housing Benefit and Council Tax Benefit Review Boards

Licensing Sub-Committee

Appeals Panel

Rent Arrears Group

- 2.7 The underlining in the above is to highlight the restriction adopted by the Standing Order on the maximum number of substitutes that could be appointed to any given committee. It should be noted that as Standing Order 34 pre-dates the introduction of executive arrangements it does not include provisions for substitutes on Cabinet or Overview and Scrutiny Committees.
- 2.8 As part of the report to the Policy and Resources Committee on the adoption of Standing Order 34, a number of counsel's opinions which were in circulation at the time were considered by officers. These were to a certain degree in conflict with one another and, as stated in the notes on the modular constitution "*a definitive view cannot be given until either the issues are tested in court*". This did not deter this council or the majority of other councils in the country from proceeding to introduce rules making provision for substitute members. To this date, the position remains untested in the courts.

What are the current rules governing the appointment of substitute members?

- 2.9 The current rules governing the appointment of substitute members are set out in Appendix 1 and reflect the core parts of Standing Order 34. The rule limiting the number of substitute members that may be appointed to a committee is Council Procedure Rule 4(3) as follows:

"In no case shall the number of Substitute Members appointed by a political group to a Committee or Sub-Committee or Panel/Group exceed one third of the number of seats allocated to the political group calculated to the nearest whole number save that each political group shall have the right to appoint at least one Substitute Member in all cases."

- 2.10 Subsequent to the adoption of the Modular Constitution, the Council has adopted eligibility criteria for substitute members of Planning Committee, Regulatory Function Committees (Licensing, Regulatory and Governance) and the Standards Committee so that Members wishing to substitute on these committees must have undergone appropriate training before being eligible to be appointed as a substitute.
- 2.11 The Council's Constitution is consistent with the statutory position of the Local Government Act 2000 which prevents members of the executive from sitting (and therefore substituting) on Overview and Scrutiny Committees.

What do other authorities in Kent do?

- 2.12 A comparison was undertaken between the Dover District Council's arrangements on the appointment of substitutes and those in place at other Kent authorities. The results of this comparison are set out in Appendix 2 of this report; however the only consistency in the findings is the inconsistency of the arrangements, ranging from authorities offering no provision for substitutes through to those offering no limitation on the number of substitutes on 'Ordinary Committees' of the Council.

Why change the arrangements governing the appointment of substitute members?

(a) *Why do we need substitutes?*

- 2.13 In reviewing the current arrangements governing the appointment of substitute members, it is useful to consider the most common reasons for appointing a substitute member. These are in general terms either:
- (a) the unavailability of a member to attend a specific meeting – whether due to a clash with a personal or another council commitment; or
- (b) the inability of a member to participate in a significant portion of the business of a meeting and any votes upon the matter. This is usually due to a Disclosable Pecuniary Interest (DPI), Other Significant Interest (OSI) or other conflict of interest (such as pre-determination/bias) arising.

(b) *How often are substitutes used?*

- 2.14 The Planning Committee has the greatest number of scheduled meetings during a municipal year (13) and it is not uncommon for it to have a number of additional special meetings called each year, sometimes at relatively short notice (subject to the maintenance of statutory notice periods for agenda publication). An analysis of attendance at the Planning Committee over the municipal years 2012/13 and 2011/12 reveals a picture of significant use of substitute members.
- 2.15 The Planning Committee is currently composed of 10 Members (6 Conservative, 4 Labour), which permits 2 substitutes from the Conservative Group and 1 substitute from the Labour Group. During the 5 meetings so far of the municipal year 2012/13, 3

meetings had 2 substitute members present and the other 2 meetings had the maximum 3 substitute members present.

- 2.16 The trend for a high number of substitutes was sustained in the municipal year 2011/12, in which only 4 of the 16 meetings held had no substitute members present. There were 5 meetings with 1 substitute present, 6 meetings with 2 substitute members present and 1 meeting with 3 substitute members present. In addition, the meeting with 3 substitute members present was only attended by a total of 8 members including the substitutes. Whilst the number of non-substituted members prevented the issue of a failure to achieve a quorum without the substitutes arising, the use of substitute members clearly does play a significant part in the membership of the Planning Committee.
- 2.17 In terms of Regulatory Function Committees, the Licensing Sub-Committees are small enough (3 members) that the current rules governing the appointment of substitute members actually allows for the majority of the Sub-Committee to be composed of substitute members.
- 2.18 The Overview and Scrutiny Committees (which form part of the 'Other Committee' group for the purposes of this report) also have a pattern of regular substitute usage. The Scrutiny (Policy and Performance) Committee has had substitutes at every meeting this year, although no meeting has had more than 2 substitutes present. For the municipal year 2011/12, there were 3 out of 12 meetings where no substitutes were present. Again, no meeting had more than 2 substitutes present.

(c) *Proportionality?*

- 2.19 Although up to a third of the seats on any given committee can be substituted (with a minimum of one seat) due to the current political balance of the Council this means in numerical terms that the minority group will usually be limited to a maximum of one substitute member. For short notice meetings, this can have a disproportionate impact on one political group over another.

What are the risks in changing the limit on the number of substitute members?

- 2.20 If the limit on the number of substitutes was removed there is the potential for an entire committee to be composed of substitute members. The risk in such a situation is the loss of continuity in decision making and the public perception that substitutions have been made for purposes other than the transaction of the business of the authority (although arguably this risk also exists with any substitution). The primary mitigation for this risk is self-awareness / self-regulation by Members of how the use of a high number of substitutes appears to the public and to date on committees of 3 members where majority substitution could arise under the current substitution rules this has never been an issue.
- 2.21 Further, the greater the proportion of members who substitute the greater the risk that the committee looks less like the committee which was actually appointed by the Council. Arguably, this increases the likelihood of successful challenge of an unpopular decision.

What alternatives are there to changing the rules governing the appointment of substitute members?

- 2.22 Where the appointment of a substitute member arises due to a declared interest, whether DPI or OSI, a Member would not be able to participate in the debate or vote

upon, the matter to which their interest applied. However, the Localism Act 2011 does require the Code of Conduct to put in place arrangements for the granting of Dispensations and the Council delegated to the Monitoring Officer responsibility for awarding Dispensations. The Localism Act permits Dispensations to be granted in the following circumstances:

- (a) considers that without the dispensation the number of persons prohibited by section 31(4) [a Disclosable Pecuniary Interest] from participating in any particular business would be so great a proportion of the body transacting the business as to impede the transaction of the business;
- (b) considers that without the dispensation the representation of different political groups on the body transacting any particular business would be so upset as to alter the likely outcome of any vote relating to the business;
- (c) considers that granting the dispensation is in the interests of persons living in the authority's area;
- (d) if it is an authority to which Part 1A of the Local Government Act 2000 applies and is operating executive arrangements, considers that without the dispensation each member of the authority's executive would be prohibited by section 31(4) from participating in any particular business to be transacted by the authority's executive; or
- (e) considers that it is otherwise appropriate to grant a dispensation.

2.23 However, while such provision exists to grant Dispensations, Members should be mindful that it may not always be desirable in terms of public perception and good governance to permit a Member to participate in a decision of or vote upon to a matter in which they have an interest.

3. Identification of Options

3.1 In reviewing the rules governing the limit on the number of substitute members that can be appointed to any given Committee, Sub-Committee or Working Group it is clear that any change to the existing arrangement must achieve a sensible, legal, transparent and workable arrangement. To that end it is suggested that any change to the rules governing the use of substitute members be the subject to review by the Governance Committee after a period of 12 months.

3.2 In addition, nothing in this report would change the requirement for Members to provide notice (either oral or in writing) to the Democratic Support Officer named on the agenda of a substitution prior to the start of the meeting or allow such notice to be revoked in respect of a meeting.

4. Evaluation of Options

4.1 There are 3 options open to Members in respect of the arrangements governing the appointment of substitutes for the Planning Committee, Regulatory Function and Other Committees as follows:

4.2 **Option 1** – To make no change to the existing arrangements governing the appointment of substitute members. This is not the recommended option as it does not increase flexibility.

- 4.3 **Option 2** – To remove the rules limiting the number of substitutes to allow the same number of substitutes in respect of each political group as that group holds ordinary seats on a Committee (i.e. excluding Cabinet), while still keeping the requirement that to be eligible to substitute a member must have undergone training for those committees that this requirement is specified for in the Constitution. This is the recommended option as it provides the most flexibility in arrangements for conducting meetings.
- 4.4 **Option 3** – To determine a different limit for all committees or for individual committees within the groups of Planning Committee, Regulatory Function Committees and Other Committees. This option offers a range of possibilities from removing the ability to appoint any substitutes to introducing an alternative numerical limit or percentage.
- 4.5 This is not the recommended option as it still provides restrictions in the number of substitutes and if different limits were to be favoured for each type of committee it would make them administratively cumbersome to support and confusing to Members.
5. **Resource Implications**
- 5.1 There are no resource implications for this report.
6. **Appendices**
- Appendix 1 – Extract of Rule 4 of the Council Procedure Rules
- Appendix 2 – Comparison of the rules governing the appointment of substitute members in Kent.
7. **Background Papers**
- Constitution of the Council

Contact Officer: Rebecca Brough, Team Leader – Democratic Support

***4. APPOINTMENT OF SUBSTITUTE MEMBERS OF COMMITTEES, SUB-COMMITTEES AND PANELS/GROUPS**

- (1) A full member of a Committee or Sub-Committee or Panel/Group who is unable to attend a meeting and wishes a substitute member to attend the meeting in his/her place, shall make the necessary arrangements with any other member of his/her political group and shall either give, or arrange for the nominated substitute member or any other member of his/her political group, to give notice of the substitution before the time when the meeting is to commence, either in written or oral form to the Committee Officer named on the agenda.
- (2) Neither the Chairman or Vice-Chairman of the Council nor any member of the executive shall act as Substitutes for any member of any Scrutiny Committee.
- (3) In no case shall the number of Substitute Members appointed by a political group to a Committee or Sub-Committee or Panel/Group exceed one third of the number of seats allocated to the political group calculated to the nearest whole number save that each political group shall have the right to appoint at least one Substitute Member in all cases.
- (4) The effect of a valid notice of substitution (whether written or oral) shall be that the full member shall cease to be a member of the Committee or Sub-Committee or Panel/Group (as the case may be) for the duration of that meeting (and for the duration of any adjournment of that meeting) and that the substitute member shall be a full member of the Committee or Sub-Committee or Panel/Group (as the case may be) for the same period; and that the full member shall resume membership of that Committee or Sub-Committee or Panel/Group after the conclusion of that meeting (including any adjournment thereof).
- (5) A valid notice of substitution (whether written or oral) once given in respect of a meeting of a Committee or Sub-Committee or Panel/Group may not be revoked in respect of such meeting or any adjournment of it.
- (6) The Committee Officer (or his/her representative) shall announce the appointment of any substitute members made in accordance with this Standing Order at the commencement of the meeting.
- (7) In the event of the Chairman of a Committee or Sub-Committee or Panel/Group being absent and appointing a substitute member to attend in his/her place, the substitute member may only act as an ordinary member and will not assume any rights of the full member to act as Chairman (and in such event the normal rules as to the Vice-Chairman taking the chair will apply). In the absence of both the Chairman and Vice-Chairman from a meeting (and the appointment of substitute members to attend in their place) the meeting shall appoint a Chairman for the meeting who may be drawn from any members (including any substitute member) present and with voting rights.
- (8) In respect of the Standards and Governance Committees, substitutions may only be made from a pool of named substitutes appointed by the Council.

- (9) (a) Only members who have received the appropriate training may be appointed to act as substitutes on:
 - (i) the Planning Committee
 - (ii) the Regulatory Committee
 - (iii) the Licensing Committee
 - (iv) the Governance Committee.
 - (b) Only members of the Regulation and Licensing Committee who have received the appropriate training may be appointed to act as substitutes on the Licensing Sub-Committee.
- (10) In the case of a joint meeting between two or more Committees, a Member who is a full Member of more than one of those Committees may appoint a substitute in respect of his/her place on one or more of those Committees (notwithstanding that he/she is able to attend the meeting as a full Member of one of those Committees).

Substitutes – Comparison with other Local Authorities in Kent

Local Authority	Extract from Constitution regarding Substitutes or Position of Local Authority
Ashford Borough Council	<i>Have no limit on the number of substitutes (confirmed by telephone on 5/9/12).</i>
Canterbury City Council	For each committee, the council will allow the same number of substitutes in respect of each political group as that group holds ordinary seats on that committee.
Dartford Borough Council	Substitution for each Committee, Sub-committee, Board and Panel will not normally be applied to more than three members in each Political Group.
Gravesham Borough Council	For each committee or sub-committee the Council will appoint the same number of substitutes in respect of each political group as that group holds ordinary seats on that committee or sub-committee, up to a maximum of three.
Maidstone Borough Council	For each Committee (except the Standards Committee), the Council will appoint six substitutes for each political group. For each Sub-Committee (except the Standards Sub-Committees), Committees will appoint five substitutes for each political group. The Council will appoint three substitute members (one from each political group) to the Standards Committee who can each be called upon to substitute for any member of the Standards Committee.
Medway Council	The political parties shall substitute no more than one-half of their members at any Committee or Sub-Committee (all figures to be rounded up to the nearest whole number).
Sevenoaks District Council	<i>Do not allow substitutes (confirmed by telephone on 5/9/12).</i>
Shepway District Council	<i>Have no limit on the number of substitutes (confirmed by telephone on 5/9/12)</i>
Swale Borough Council	<i>Have no limit on the number of substitutes (confirmed by telephone on 5/9/12)</i>

Local Authority	Extract from Constitution regarding Substitutes or Position of Local Authority
Thanet District Council	The Council will appoint as substitute members of Committees and Sub-Committees those members nominated by each political group. Political groups may nominate every other member of the group provided that neither the Chairman nor Vice-Chairman of Council nor any member of the Cabinet shall be eligible to be a substitute member at any Committee or Sub-Committee on which either the Chairman or Vice-Chairman or a member of the Cabinet may not sit.
Tonbridge and Malling Borough Council	<i>Do not allow substitutes (confirmed by telephone on 5/9/12).</i>
Tunbridge Wells Borough Council	<i>Substitutes permitted from a named pool which is appointed at Annual Council when the membership of the committee is determined (confirmed by telephone on 5/9/12).</i>

Subject: REVIEW OF THE EAST KENT ARRANGEMENTS

Meeting and Date: Special Cabinet – 1 October 2012
Extraordinary Council – 3 October 2012

Report of: Harvey Rudd, Solicitor to the Council

Portfolio Holder: Councillor Paul Watkins, Leader of the Council

Decision Type: Non-Key

Classification: Unrestricted

Purpose of the report: To request the Cabinet and the Council to Consider the report of the Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover) attached at Appendix 1 together with the recommendations of the East Kent Joint Arrangements Committee which considered the report on 20 June 2012 with a view to:

- (1) Approving the dissolution of the East Kent Joint Arrangements Committee and the East Kent Joint Scrutiny Committee.
 - (2) Authorising the development of operating arrangements for a committee relating to functions shared by Canterbury City Council, Dover District Council and Thanet District Council.
 - (3) Making of consequential arrangements with regard to the delegation of functions.
-

Recommendation: That the recommendations of the East Kent Joint Arrangements Committee made at their meeting of 20 June 2012 be approved by the Cabinet and the Council as set out in that report.

1. Summary

The report of the Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover) attached at Appendix 1 examines options for the East Kent Committee Arrangements in the future and suggests a way in which they might be adjusted to align with the services being delivered.

The attached report is an example of joint working (in this case between the Heads of Legal of Dover and Canterbury). As it is important that all Councils participating in the East Kent Joint Arrangements consider the same report no attempt has been made to modify it in order to present it in the usual Dover District Council report format.

2. Introduction and Background

- 2.1 Please see the attached report of Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover).

3. Identification of Options

3.1 Please see the attached report of Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover).

4. Evaluation of Options

4.1 Please see the attached report of Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover).

5. Resource Implications

None.

6. Corporate Implications

6.1 Comment from the Section 151 Officer: Finance has been consulted and has no further comments to add (SJL).

6.2 Comment from the Solicitor to the Council: Please see the attached report of Head of Legal and Democratic Services (Canterbury) and the Solicitor to the Council (Dover).

6.3 Comment from the Equalities Officer: This report does not specifically highlight any equalities implications however, in discharging their responsibilities members 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>.

7. Appendices

Appendix 1 – Report of the Head of Legal and Democratic Services (Canterbury and Solicitor to the Council (Dover) – “Review of the East Kent Arrangements”

8. Background Papers

None

Contact Officer: Harvey Rudd, Solicitor to the Council.

Subject:	Review of the East Kent Arrangements
Director/Head of Service:	Head of Legal and Democratic Services (Canterbury) and Solicitor to the Council (Dover)
Decision Issues:	These matters are within the authority of the Executive and the council.
Decision type:	Non-key
Classification:	This report is open to the public.
Summary:	<i>This review examines options for the East Kent Committee Arrangements in the future and suggests a way in which they might be adjusted to align with the services being delivered.</i>
1. To Recommend to Council and to formally agree council approving the resolutions at (a), (b) and (e)	<p>That the amendments to the East Kent Arrangements set out in this report be adopted and therefore:-</p> <p>(a) The East Kent Joint Arrangements Committee and the East Kent Joint Scrutiny Committee be dissolved with effect from which ever is the later of:-</p> <p>(i) 1 October 2012 or</p> <p>(ii)- the establishment of the Committee referred to in (b) below.</p>
2. To Resolve (c), (d) and (f)	
3. To consider (g) and recommend to Council	
	<p>(b) That operating arrangements for a Committee relating to functions shared by Canterbury City Council, Dover District Council and Thanet District Council ('the Continuing Councils') be drafted by the respective heads of legal and be submitted to the Continuing Councils for approval with scrutiny being undertaken by the scrutiny committees of the Continuing Councils. Kent County Council and Shepway District Council to be notified of the date of establishment of the new committee.</p> <p>(c) That any existing delegations to the Director of Shared Services, the Head of the East Kent Human Resources Partnership and the Payroll Officer for Kent County Council relating to the functions of the Continuing Councils continue.</p>

- (d) That the delegation to the Payroll officer for Kent County Council through EKJAC for the benefit of Shepway District Council continue.
- (e) All agreements or arrangements which may need to remain in effect after the dissolution of EKJAC be reviewed by the Heads of Legal of all the Participating councils and they be delegated the power by their respective councils that if relevant to them they agree the continuation of those matters in such form as they think appropriate.
- (f) That a further meeting of EKJAC be convened if necessary to deal with any residual issues.
- (g) The Scrutiny Committees of the five individual councils be invited to participate in an arrangement for Scrutiny members to meet four times per year to consider strategic matters relating to shared services and other joint interests.

Next stage in process **Reports to be submitted to the councils and executives of all participating councils.**

SUPPORTING INFORMATION

1. Introduction

At the meeting of the East Kent Joint Arrangements Committee (EKJAC) on 14 March 2012 the Committee received a report from us with a proposed protocol refining the administrative arrangements for the East Kent Joint Scrutiny Committee (EKJSC) and governing its relationship with the Scrutiny Committees of individual authorities.

From that debate it was clear the EKJAC wished to get on with exercising its oversight of shared services but also that scrutiny should primarily be exercised at the local level. Problems which arose at a strategic level should be for the EKJAC to address.

This led in turn to a wish to review the Committee arrangements in the light of how they have functioned and where shared services now are both in terms of reporting to the EKJAC and which services are shared or in prospect of being shared. It was envisaged such review might entail having some other form of management arrangements.

Background

EKJAC and East Kent Joint Scrutiny Committee (EKJSC) were formed in June 2008 as part of a plan to develop shared working across East Kent with the participation of

the four district councils and the county council. The arrangements envisaged that the EKJAC would have a strategic role in overseeing the development of ideas and then a management and monitoring role as services became shared. The EKJAC oversaw proposals for sharing revenues and benefits, information technology, customer contact centres, housing management, human resources and waste. It has been a very significant programme of projects.

A review of the arrangements was carried out by former district council Chief Executive Mr Douglas Bradbury. His report was approved by the EKJAC on 19 May 2010. The difficulty in implementing it proved to be something which has particularly concerned the EKJSC. This is the participation of authorities in debates who are not participants in a particular shared service. Legally if a Member is appointed to a Committee they have a right to fully participate in its business and only by convention could they be excluded. For whatever reason there does appear to be a reluctance for authorities which are not engaged in a particular shared service to have an involvement in its governance.

The EKJAC considered this report at its meeting on 20 June 2012 and resolved to recommend to the participating councils as set out above. The East Kent Joint Scrutiny Committee also considered the report and have added a further recommendation. See the consultation section later.

The Services

It may be helpful to review in relation to each service where it now stands in relation to the joint committees and the individual authorities.

East Kent Services

This is a joint service hosted by Thanet with, in effect, a brand name. It provides revenues and benefits, information technology and customer contact services to Canterbury City and Dover and Thanet District Councils. It reports directly to EKJAC and the EKJAC has delegated the relevant powers to the Director of Shared Services who heads the organisation.

East Kent Human Resources

This is a separate shared service which up to 31 March 2012 provided shared services to Canterbury City, Dover, Shepway and Thanet District Councils. Shepway withdrew with effect from 31 March. The Head of the East Kent Human Resources Partnership is also delegated powers through the EKJAC although on the basis of a different form of agreement.

East Kent Housing

This is an arms length management organisation providing housing management services to Canterbury City, Dover, Shepway and Thanet District Councils. Having been developed under the auspices of the Joint Committee Arrangements it now has its own management arrangements. East Kent Housing is a separate company with its own employees. The four authorities are represented on an Owner's Committee which is charged with making the key management decisions. The East Kent Joint Arrangements Committee having overseen its establishment now has no role in relation to it.

Waste

The EKJAC has overseen the development of arrangements across east Kent. All the participants in the East Kent arrangements have signed a five way waste agreement intended to set the strategic direction for waste across east Kent and in particular committed us all to the method of collections known as the "NOM". Whilst the aspiration is to move towards a single contract our respective contractual timetables meant that Shepway, Dover and Kent have tendered and secured a contract, Canterbury is in the process of doing so and Thanet has its in-house operation. In relation to the existing and proposed contractual arrangements the EKJAC has no management role. It remains the place where strategic matters, should they arise, can be debated.

The role of EKJAC

The EKJAC's Terms of Reference are attached as Appendix 1 to this report. It clearly has a role in relation to those services where delegations have been made to it and where it in turn has delegated to an officer acting on its behalf. However that now concerns three of the five authorities.

As noted above it could have a strategic role in relation to waste but given the decisions that have been made and the contracts which have been entered into or will be entered into that strategic role will probably not revive until perhaps 2017 when decisions will need to be made on an east Kent contract.

Ashford Borough Council is also an east Kent authority. It was for some time associated with the housing project but withdrew. It has expressed an interest in exploring some form of formal connection with the other east Kent districts which if it arises is likely to mean an alignment of certain of policies and perhaps the sharing of services associated with them.

Drawing these threads together then the questions which arise are:

- should the east Kent arrangements be refashioned to facilitate a wider grouping?
- alternatively using the precedent of East Kent Housing should it be refashioned to become a management body for East Kent Services consisting solely of the three participating districts, or
- should the arrangements be abolished altogether and the authorities simply have an agency arrangement with Thanet.

Discussion

The fundamental question is whether the original vision held in 2008 still holds true.

In our view Shepway's decision not to participate in East Kent Services and then to withdraw from East Kent HR is significant. Further the strategic oversight of waste does not appear to be a live issue at least in relation to decision making and East Kent Housing has its own separate arrangements. If there are to be future shared arrangements it appears this may on a broader east Kent scale including Ashford or alternatively the three participating authorities in East Kent Services may add further to the functions performed by that organisation.

Therefore there are quite persuasive arguments for suggesting that the joint arrangements in their current form might usefully be changed.

This suggests one of two alternatives as things presently stand. First that the arrangements are refashioned simply to cover those participating authorities in East Kent Services or alternatively the Committee is abolished altogether and there is simply an agency arrangement with Thanet.

The pros and cons

The difficulty with an agency arrangement is one of accountability. The agent at any time (subject to the details of the agency) may divest themselves of the responsibility. In times of stability what is a relatively short term arrangement may extend over several years. However in times of economic uncertainty ultimately the interests of the agent must always come first unless there is some positive incentive to carry on the agency the authorities delegating the function must appreciate they have little real control in how it is performed although they always have the option of withdrawing the delegation.

A joint committee addresses the question of accountability. The respective authorities delegate functions to the joint committee which in turn delegates them to a single officer of one of the participating authorities. That officer is answerable to the joint committee for those functions and not to the authority by whom they are employed. This means that every participating authority has a say in the management of the functions and whilst they may be outvoted in the joint committee they have the right to influence the management and performance of the service.

Thus whilst for a simple or straight forward service or, as in the case of waste, where it bears a direct relationship to an external contract into which all the parties are bound, an agency arrangement has its place, it is not to be recommended for a range of services involving a substantial number of staff.

Wider east Kent collaboration

It's important to emphasize that what is being discussed solely relates to the formal Committee arrangements. The discussions between all east Kent Chief Executives and county representatives at the East Kent Forum, the East Kent Leaders and Chief Executives meetings, the East Kent Regeneration Board and discussions on some possible east Kent district arrangement would be entirely undisturbed. This solely relates to the formal Committee structure.

The need for EKJSC

As described in the report to the Committee concerning the proposed protocol the East Kent Joint Scrutiny Committee has been considering its future role and indeed behind that question was whether it does have a future role. In the context of refashioning the Committee simply to exercise oversight of the existing east Kent arrangements or the putting of additional services into them by the three participating authorities there seems rather less need for a Joint Scrutiny Committee.

It is worth remembering that at the time the joint committees were established there was no statutory foundation for establishing a joint scrutiny committee across different authorities and different local government tiers. However, consultants engaged at the time recommended that a committee be established exercising a scrutiny role. Accordingly, EKJSC was established as a joint committee under the Local Government Act 1972. It is not a statutory scrutiny committee within the meaning of the Local Government Act 2000 but exercises functions which may

broadly be described as scrutiny like functions and, were it exercises powers (e.g. call-in) it does so by convention rather than as a matter of law.

Importantly, there has been primary legislation (most recently) the Local Democracy, Economic Development and Construction Act 2009 to enable joint scrutiny committees between tiers of local government but the necessary regulations to give effect to that legislation have not been made.

The Joint Scrutiny Committee was created and has done its most valuable work when the proposals for shared services were being fashioned. With three remaining participants actively pursuing shared arrangements scrutiny can be performed at the point where services are delivered by the individual authorities and management issues can be referred to the Joint Committee for consideration. East Kent Housing is a precedent. Further, without effective statutory underpinning the question may reasonable be asked whether a scrutiny committee operating by convention is satisfactory.

If by contrast the 2008 vision still holds good then, with the addition of the protocol put to the EKJAC at its last meeting the EKJSC may have a future role providing strategic scrutiny in the future but it is clear that scrutiny of services should primarily be the function of the individual recipient authorities.

Consequences of dissolution

For the three participating councils in East Kent Services they will clearly need to form a new committee to oversee and to be held to account for the continuing shared service. Payroll is shared separately from Human Resources and includes Shepway but that is a service which is readily addressed by means of adjustment in the delegation documents to be approved and drafted by the Heads of Legal. To ensure a smooth transition a date has been recommended sufficiently in advance for the necessary decisions to be taken, scrutiny comments received and any reservations dealt with to avoid disruption. As we have existing arrangements in place they will need to be dissolved on a mutually acceptable basis and timescale.

From a practical point of view it was suggested that the meeting of EKJAC on 14 June and the EKJSC that follows it be the last meetings of these committees and that any subsequent scheduled meetings be cancelled. However EKJAC was of the view that they may need one further meeting to deal with any residuary matters.

This is more likely as the recommendations to EKJAC have been modified in case there are delays in establishing the new committee to oversee the shared services of the continuing councils. Setting a fixed date is good for encouraging progress but would cause serious administrative problems if one or more of the continuing councils had been unable to get the necessary approval to the new committee by the due date. It is intended the delegations should pass smoothly from one to another and all continuing councils need to be in agreement. The modified recommendation allows EKJAC to continue in existence (even if it does not meet) until such time as that can happen.

2. Relevant Documents

The East Kent Joint arrangements.

3. Consultation planned or undertaken

At their meeting on 11 July the EKJSC passed the following additional resolution of which this is the draft minute:

That the recommendation contained in the report be approved subject to the addition of the following: The Scrutiny committees of the five individual councils be invited to participate in an arrangement for Scrutiny Members to meet four times per year to consider strategic matters relating to shared services and other joint interests.

Strictly this should be referred back to EKJAC for comment but given the committee was not taking issue with that committee's recommendation, the EKJSC proposal is being put direct to the participating councils.

It was explained to the EKJSC that what they proposed did not require a formal resolution. The Scrutiny Committees of the various councils could themselves initiate a joint review. However, members felt that a forum which was constituted between all the parties (not just those involved in shared services) to discuss issues of mutual interest would be beneficial.

The question remains how far it is necessary to have a formally constituted joint committee to do this and the councils are invited to consider this topic.

4. Options available with reasons for suitability

Refashioning the Committee arrangements to reflect the services which are actively being shared whilst retaining the other bodies to facilitate collaboration in other areas appears the best way of deploying resources effectively.

5. Reasons for supporting option recommended, with risk assessment

The reasons for the proposal are set out in the report. There is little risk in rejecting them and maintaining the status quo if that is required.

6. Implications

(a) Financial Implications

None.

(b) Legal Implications

See the body of the report. All heads of legal of all the participating councils have been consulted upon it.

7. Conclusions

We argue that the participating authorities should revisit the 2008 vision for the East Kent arrangements and decide whether they still hold good. In our view the informal arrangements certainly do and are gaining in importance. So far as the formal Committee arrangements are concerned they could be more usefully confined to those authorities who are actively participating in shared services through the mechanism of a refashioned EKJAC with the participating authorities of Canterbury, Dover and Thanet. There would be no need for a joint scrutiny committee with scrutiny being carried out the district level.

We suggest the arrangements are refashioned along those lines.

Contact Officer: Harvey Rudd, Solicitor to the Council.

The Schedule

TERMS OF REFERENCE of the EAST KENT (JOINT ARRANGEMENTS) COMMITTEE

1. To exercise the executive and non-executive functions of the parties in order to commission, co-ordinate, provide, procure and/or manage any shared services as are agreed from time to time by two or more of the Parties
2. To provide strategic direction to the officers advising the EKJAC
3. To exercise any of the functions or services that are determined to be a shared service in accordance with these arrangements
4. To develop work programmes and projects in relation to the functions which the parties are minded to be delegated to the EKJAC by the Parties
5. To regularly report to each of the Parties on its activities
6. To respond to reports and recommendations made by the East Kent Joint Scrutiny Committee
7. To monitor the operation of the EKJAC and of any shared service
8. To propose a budget for a shared service to the Parties and to monitor and manage any such budget once approved by them
9. To review these arrangements from time to time and make recommendations to the Parties for improvement and change and to propose (as appropriate) the creation of special purpose vehicles for the achievement of the Objectives, including companies, formal partnerships or consortia, the expansion of these arrangements to include other local authorities, the conclusion of contracts with other persons and the provision of services, supplies and works to other persons

Subject:	URBAN RENEWAL – PROPOSALS FOR THE DEVELOPMENT OF NEW HOUSING ON COUNCIL OWNED LAND
Meeting and Date:	<p>Special Cabinet – 1 October 2012</p> <p>Scrutiny (Community and Regeneration) Committee – 2 October 2012</p> <p>Extraordinary Council – 3 October 2012</p>
Report of:	Roger Walton, Director of Environment and Corporate Assets
Portfolio Holders:	Councillor Nigel Collor, Portfolio Holder for Access and Property Management and Councillor Sue Chandler, Portfolio Holder for Community, Housing and Youth
Decision Type:	Key Decision
Classification:	Unrestricted

Purpose of the report:	To seek the agreement to and make budget provision for, a new initiative involving the development of Council owned land holdings for housing purposes in support of the Council's Corporate Objectives for Regeneration and Urban Renewal.
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Recommendation:	<p>Cabinet are asked to:</p> <ol style="list-style-type: none"> 1. Confirm their support for the proposed initiative. 2. Request the Leader to Delegate to the Portfolio Holder for Community, Housing and Youth acting in consultation with the Portfolio Holder for Access & Property Management and the Director for Environment & Corporate Assets responsibility for the selection of the most appropriate sites and methods of development, in accordance with the criteria set out in Appendix 1 to the report with the proviso that the awarding of contracts to deliver the developments will be reported to Cabinet for decision in accordance with the Council's constitution. 3. To recommend to Council that; <ol style="list-style-type: none"> (i) An additional budget of £125k per annum be allocated from within the HRA budget to finance a project team of 2 FTE for this project. (ii) That within the HRA capital programme, an initial budget allocation be made of £2.5m, for the development of additional housing; <p>Council are asked to:</p> <ol style="list-style-type: none"> 1. Confirm their support for the proposed initiative. 2. Agree to the additional budget requirements as set out in the Cabinet recommendations.
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1. Summary

This report sets out proposals for the Council to take a more active role in the development of the Council's own land assets for housing purposes, focusing initially on small under used areas of land within the Council's ownership to act as a catalyst for regeneration within the Dover urban area especially. The plan is to achieve early gains with small and "easy to develop" sites and refurbishments, and to take a strategic view of larger and more challenging sites as opportunities arise.

The report also notes that there may be benefit in certain circumstances for the Council to seek to acquire and refurbish selected poor quality housing properties currently within the private rented sector and recommends that the authority should seek to identify any such opportunities for review and decision.

2. Background

DDC Strategy

2.1 The Council's strategic plans, whilst clearly focused on the economic regeneration of the District recognise the requirement to improve the quality and affordability of housing within the District.

2.2 The Corporate Plan sets out a clear commitment to regeneration;

Strategic Priority 1 is focused on;

'Enabling and supporting growth of the economy and opportunity for investment and jobs' recognising that 'It is therefore important to focus on economic recovery and growth and continue attracting and enabling inward investment to the district, to support the creation of local jobs, and aim to keep wealth locally to see our district grow and thrive.'

Strategic Priority 2 is focused on;

'Facilitating strong communities with a sense of place and identity' and commits the Council that 'Through the Housing Strategy we will enable housing growth and the delivery of more affordable homes, as well as improving the condition of existing homes, addressing inequality, and enabling vulnerable people access to quality housing to live independently.'

2.3 The Housing Strategy 2010 -2015 notes that there:

'...are a number of key housing issues which the Council will need to address over the next five years:

- Delivering overall housing growth to support regeneration and economic development objectives within safe, sustainable and inclusive new communities.
- Meeting the need for affordable housing.
- Delivering good quality market housing and affordable housing at a time when the future direction of the economy, housing market and public investment remains uncertain.
- Improving the particularly poor housing conditions in the private sector (especially Dover town) and tackling fuel poverty.
- Responding to the climate change agenda.

- Making best use of the housing stock including bringing empty homes back into use.
- Addressing the housing needs of a growing population of older households. By 2026, it is expected that those aged 65-84 will increase by 55.7% and those aged over 85 by 54%.
- Addressing housing causes of social and health inequality and ensuring that vulnerable people are able to access good quality housing and housing services.
- Continuing to address the problem of homelessness and especially youth homelessness.

National Strategy

- 2.4 At a national level, tackling empty homes is one of the Coalition Government's policy priorities. As part of the Comprehensive Spending Review in October 2010, the Government announced a £100m fund to bring more empty homes back into use. It is estimated that empty homes in England account for 3% of the total housing stock. According to Council Tax Data collected by local authorities, there were 734,000 vacant dwellings at the end of September 2010. Out of those, 301,000 are in the private sector, which accounts for 1.6% of all private sector stock.
- 2.5 The Government published its Housing Strategy on 21 November 2011, of which an important part is its strategy for tackling empty properties. The strategy included details of £100m capital funding from within the 2011-15 Affordable Homes Programme that had been set aside to tackle long-term empty properties which would not come back into use without additional financial intervention. The majority of that funding is available over the period 2012-15 and is intended to deliver at least 3,300 Affordable Homes by March 2015.
- 2.6 The Department for Communities and Local Government (DCLG) is the department responsible for shaping housing policy in England and it is up to individual District and Borough Councils to formulate and implement their own policies to deal with empty residential properties. DCLG Policy Statement: "It is important to maximise use of the existing housing stock so that we can minimise the number of new homes that need to be built each year, particularly in areas of the country where housing demand is high, such as the south east of England."
- 2.7 The government's Housing Strategy openly encourages Councils to take a stronger role in the provision of new social and affordable housing and with authorities such as London Borough of Hammersmith & Fulham, London Borough of Barking & Dagenham and Woking Borough Council bringing forward proposals for housing development.
- 2.8 In Hammersmith & Fulham, the Council was concerned that the option of disposal of land to developers, be they housing associations or private sector developers, fails to maximize its financial return, gives it limited control over what is built on the site and takes away control of any affordable housing on the site.
- 2.9 Woking Borough Council was successful in securing £44million of government funding for the Priority Homes Project - a Private Finance Initiative (PFI) scheme aiming to provide at least 190 homes let at affordable rents to applicants on the Council's housing register. It will provide much needed homes for local families. Approximately 400 dwellings are to be built under the scheme. Those dwellings not part of the PFI will be private houses available for sale on the open market. The

residents of the affordable housing will not be Council tenants; they will be tenants of a Registered Social Landlord (RSL) or Housing Association who will be managing and maintaining those properties to standards agreed to by the Council.

- 2.10 The government has also sought to reinvigorate the right to buy market. In *Laying the Foundations: A Housing Strategy for England*, the Government announced its intention to increase the caps on Right to Buy discounts to enable more tenants to achieve their ambition for home ownership. It also set out the Government's commitment to ensure that the receipts on every additional home sold under the Right to Buy are used to fund its replacement, on a one for one basis, with a new home for Affordable Rent. These changes took effect from 2 April 2012.
- 2.11 In recent years the number of properties sold each year by this Council under the Right to Buy had dwindled to single figures. These new policies have the potential to increase the numbers of properties sold and to increase the pressure on the Council to provide additional dwellings.

3. Objectives for this Authority

- 3.1 There are a number of drivers, which support the proposal that the Council should take a more active role in the development of new housing on Council owned land including:

- Add to local housing stock

It will make some contribution to meeting the LDF core strategy new homes target and may help generate New Homes Bonus monies including a premium for affordable homes

- Maintain the delivery of affordable housing

The need to provide more affordable homes is evidenced by the 2009 Strategic Housing Market Assessment and the number of applicants on the Council's register which is currently just under 3,000. Housing association development activity in the district is relatively low. HAs have become more risk averse since the impact of the credit crunch on the housing market and they are also impacted by a general difficulty in accessing development finance. Development viability issues affecting sites in parts of the district mean the Council can't rely on the delivery of affordable housing via S.106 sites.

- Kick start house building

The housing market both nationally and locally remains reasonably depressed. The Department for Communities and Local Government (DCLG) reported in May that public and private house builders started building just 24,100 new homes in the first three months of the year. That was an 11% drop from the last three months of 2011, and a 15% drop from the first quarter of last year. There were 109,020 new homes completed in England last year, which was up from 103,300 in 2010, but below the average of 142,000 for the previous decade. The construction industry has seen a fall in output between March and May of 7.4% from the same period in 2011. Developers appear to be finding it difficult to access funds despite various government initiatives

and so any intervention by the Council has the potential to assist in meeting the current shortfall in new-starts.

- Stimulate regeneration

Selected investment in new building has the potential to support the Council's Regeneration and Urban Renewal objectives by bringing forward sites where redevelopment has been delayed and/or by so stimulating other landowners to invest in their own sites.

- Adding value to existing Council land holdings

The Council's land holdings include many plots of land which as a consequence of their location or use currently have little intrinsic value. This proposal will enable the Council to progressively increase the overall value of its estate as sites are developed

4. Identification and Evaluation of Options

4.1 In a project of this complexity there are a wide range of options. For simplicity, these have been broken down into:

- High Level Options;
- Development Options; and
- Delivery Options.

4.2 Each of these options are considered below.

High Level Options

4.3 At the highest level the options are:

- to utilise HRA resources in a sustainable way, to implement a policy of developing spare or under used pieces of land for housing purposes and refurbishment; or
- to maintain current policies and not to utilise HRA resources in a sustainable way, to implement a policy developing spare or under used pieces of land for housing purposes and refurbishment

Evaluation of High Level Options

4.4 Maintaining current policies will avoid any potential risks, and will protect the HRA balances at their current high level. However, it will also fail to promote regeneration and house building opportunities in a range of sites in the district, will not increase the housing stock and would not ensure best use of spare or under used pieces of land. For these reasons this is not the preferred option.

4.5 In contrast, sustainable development of sites currently owned by the HRA will add to the housing stock in the district, add value to the Council's existing land holdings, assist in local regeneration and potentially improve the quality of estates. For these reasons, this is the recommended high level option.

Development Options

- 4.6 In a development strategy like this, with a number of small sites that could be developed, there are three main options. They are:
- Consider and report to Cabinet on the merits of each site
 - Adopt criteria for assessing each site and delegate the approval of individual developments to the appropriate portfolio holder(s); or

Evaluation of Development Options

- 4.7 The production of separate reports to Cabinet for individual sites, which are already owned by the HRA, leading to the development of a few properties on each site, would give Cabinet tight control over the project. However, development, even of small sites, can be a complex process. Production of reports to seek approval of the initial development, and subsequent reports where there are changes is likely to slow down the delivery of the completed development.
- 4.8 For these reasons, this option is not recommended.
- 4.9 If a comprehensive set of criteria for each development can be approved, then these criteria can be applied to each potential site and the relevant portfolio holder(s) can approve or reject the proposed developments based on these criteria. This will ensure that no developments happen outside of the agreed criteria, but will minimise the level of detailed reporting required and therefore facilitate progress on delivery. For these reasons, this is the preferred option.
- 4.10 A comprehensive list of criteria which it is proposed be used for the assessment of individual sites has been developed as set out in Annex 1. Additional criteria could be developed, but they would add to the complexity of the project.

Delivery Options

- 4.11 There are a number of options available to the Council as to how the proposed programme can be delivered.
- 4.12 They are:
- Partnership with a single housing association partner
 - Sites packaged and marketed to Housing Associations
 - Council develops the sites
 - Council directly procures development
 - Development is procured via a special purpose vehicle
 - Development is procured via a joint venture model
- 4.12.1 These are considered as set out below. Based on this analysis, the preferred delivery option is Option 3. Within that option there are further delivery mechanisms that would be selected depending on the scheme to be delivered based on the development criteria appropriate for the specific site. In general it is anticipated that

the best solution will be for the Council to directly procure the development but there may be some sites where a joint venture approach might be better. This could include joint ventures with developers or other statutory agencies such as KCC.

1. **Partnership with a single housing association partner**

Strengths

- The Council would develop a close working relationship with the HA.
- The HA may be more willing to assist with development funding from its own reserves.
- Working with one partner across a number of sites may help achieve economies of scale.
- Working with one partner on a larger program may assist with the development of an employment and skills package providing apprenticeship opportunities and making use of local labour.

Weaknesses

- Council would be reliant on one HA delivering a large number of units on mostly very constrained sites.
- Most of the main HAs including those operating in the district have signed their Affordable Housing Programme 2011-15 contracts with the HCA. Consequently, they will be limited in terms of capacity.

2. **Sites packaged and marketed to HAs**

Strengths

- Competition may generate an increased capital receipt for the land.
- Relatively low risk to the Council. Each site would be developed by a HA that had a specific interest in it.
- More chance they could accommodate a small package of sites in their HCA programme.

Weaknesses

- A small package of sites may not generate much interest, particularly those in Dover.

3. **Council develops the sites**

Strengths

- The Council has absolute control over what development happens where, how the properties are let, which tenures are used and when each site comes forward.

- The HRA would benefit from increased long term rental income and it would help offset property sales under RTB.
- Not subject to individual HA development or design restrictions.
- Not subject to HCA design restrictions if there is no HCA grant funding.

Weaknesses

- To develop each site will be expensive.
- The Council would assume all the development risks e.g. project overspends, unforeseen exceptional site costs, demand risks (void/sale losses), contractual issues.
- Likely staff resource costs.
- No capital receipt for the land.
- New properties potentially subject to the RTB (discount currently subject to cost floor rule which has recently been extended to 15 years).

The Council could use a combination of Options 2 and 3.

In relation to Option 3 there are some further sub options:

3a. **Council directly procures development**

This is the approach being taken by both Canterbury and Thanet.

3b. **Development is procured via a special purpose vehicle**

This is the approach being taken by Ashford.

Advantages of the SPV approach are:

- It enables borrowing outside the HRA thereby avoiding the restriction of the HRA borrowing cap.
- Any new homes are beyond the scope of RTB. However, as the source of the majority of funding, at least initially, is likely to be HRA reserves and the RTB receipt is now protected by the cost floor rule for 15 years, these benefits are not so significant for DDC.

3c. **Development is procured via a joint venture model**

House builders and RPs may be interested in a joint venture in order to build out sites in local authority ownership. They may see this as a way of reducing some of the risks associated with development particularly up front land costs.

The house builder will front fund the development and take their standard profit on the development costs with any additional profit on house sales being shared.

The Council can use their share of profits to recycle into affordable housing.

5. **Implementation**

5.1 In order to take these proposals forward it is proposed to establish a small team (2FTE) managed by the Property Services Manager within the Environment & Corporate Assets Directorate.

5.2 Subject to the recommendations within this report now being agreed an initial review of potential sites within the Council's ownership will then be quickly undertaken in discussion with the relevant Portfolio Holders and with colleagues from the Planning team to identify those sites which can most easily be quickly progressed. In the short term the objectives will be pursued primarily through:

- Refurbish structurally sound, but unused / rundown and isolated properties under DDC ownership
- Development on easily developed small / medium ad hoc unused parcels of DDC land

5.3 Discussions have also been held with officers from Ashford BC with the aim of both learning from their experience and also to see whether there is an opportunity to collaborate with them on the delivery of specific sites as this might enable the programme to commence more quickly whilst the recruitment process for the new team members is underway.

5.4 In the medium / long term as the programme progresses it is proposed to move on to more strategic development sites where the objectives will be pursued primarily through:

- Development on the more challenging small / medium ad hoc unused parcels of DDC land
- Development, where viable of larger / more complex sites.
- The sites to be considered are currently being investigated and will be the subject of a further report.

6. **Resource Implications**

6.1 Current staff resources within the authority are not sufficient nor have the requisite expertise to develop a project of this size. It is therefore recommended that a small project team (initially 2 FTE), financed from the HRA, be established within the Council's Corporate Property Team to deliver the project.

6.2 The costs of the programme are clearly dependent upon the sites chosen for development and the success or otherwise of the project but will be split between:

- a) Revenue costs of the new Project Team
 - Small project team (circa 2 FTE) required for project delivery – to be financed from the HRA.
- b) Capital costs to support the development

- Depends on financing option
- HRA balances circa £10m
- £2.5m earmarked for HRA initiatives.

<i>Revenue Implications</i>	<i>2011/12 £000</i>	<i>On-Going £000</i>
Expenditure:	45	125
Income:	0	0
Budget requirement	45	125

7. Risk Assessment

	Risk	Likelihood	Impact	Mitigation	Residual Likelihood	Residual Impact
1	Cost overrun	M	H	Full project controls and budget monitoring will be in place.	L	H
2	Project changes lead to delays and additional costs.	M	H	Delegation to the portfolio holder(s) will provide faster decision taking and flexibility to cope with changes.	L	H
3	The impact on the HRA makes the project unsustainable.	M	H	The HRA has significant balances, but the business plan will be reviewed to identify any long-term challenges and enable the project to be managed accordingly.	L	H
4	The new properties are subject to Right to Buy Purchases.	M	M	Any newly developed properties have a 15 year protection against RTB. They cannot be sold for less than the cost of development.	L	L

8. Corporate Implications

- 8.1 Comment from the Section 151 Officer: At 31 March 2012 the HRA reserves stood at circa £10m including £2.5m earmarked for "HRA Initiatives".

On 31 March 2012 the Housing Subsidy system came to an end and was replaced with a self financing system requiring a one off payment to Government of £90.473m. DDC financed this payment by taking out a loan for the same sum with the PWLB on a 30 year repayment basis at a fixed interest rate. Annual payments against this loan will be substantially less than would have been expected under the Housing Subsidy system so it is anticipated that significant additional funds will become available for Housing initiatives.

In view of the above, adequate HRA funding is available to meet both the revenue and capital requirements of these proposals subject to legislation as indicated below.

Legislation is complex but in general terms cross subsidisation between the HRA and General Fund is not permitted. Care needs to be taken to ensure HRA funds are only used on projects that the HRA will derive the benefit from (generally by way of future income streams).

The advised cost of the project team will be able to be charged to the HRA if the expectation is that their time will be wholly spent on HRA related activities. If any of the anticipated activities are considered to be General Fund then there will be the need for a pro rata split.

The use of HRA balances for any capital programme arising will depend upon the individual projects undertaken and may require the assistance of Legal to confirm the legitimacy.

Additional funding is likely to be available from retained Right to Buy receipts expected from recent Government initiatives but the level of this funding is unknown at this time. The use of these funds will be less restrictive than the HRA reserves as they can be used to help fund 'affordable rented homes' irrespective of whether or not the HRA directly benefits.

Any projects undertaken need to be sustainable in the long term as this will help ensure the long term viability of the HRA. (PH)

8.2 Comment from the Solicitor to the Council: The Solicitor to the Council has been consulted in the preparation of this report and has no further comments to make.

8.3 Comment from the Equalities Officer: The report has been amended to include in the development criteria Equality Impact Assessment. (MV)

9. **Appendices**

Annex 1: Criteria for assessing development projects

10. **Background Papers**

None.

Contact Officer: Roger Walton, Director of Environment and Corporate Assets

Proposed Development Criteria

It is proposed that in selecting sites for inclusion in the programme consideration should be given as a minimum to the following criteria:

- Ease of delivery
 - Create quick wins in easily developed sites
 - Develop more challenging small sites and larger strategic sites over the medium term.
- Locality
 - Type of site – ensure the proposals are sympathetic to surrounding developments and housing
 - Impact on local residents / community
 - Housing needs in the area
 - Potential for letting / re-sale
- Types of housing to create
 - Flats / houses (in terms of affordable housing, the mix of house types needs to be determined on a site by site basis. The Council has been trying to encourage Housing Associations to build houses in recent years but there are sites which lend themselves more to flats than houses e.g. Southern Housing's Maison Dieu Road development.
 - No of bedrooms – The loss of a greater proportion of family homes under RTB means that we have a real need currently for 3 & 4 bed houses. However, welfare reform changes which will result in those tenants who under occupy homes having their benefit reduced, may result in a need to increase the supply of smaller homes to enable people to downsize.
 - Social or market housing – again needs to be determined on a site by site basis
- Form of tenure options
 - Market sale; as certain sites may have the potential to realise a commercial return and to thus allow receipts to be reinvested in the programme.
 - Shared equity (A recent report commissioned by Thames Valley HA (Cambridge Study) shows relatively low % of shared owners staircasing to 100% ownership - since 2001 only 27,908 (19%) of the 145,000 homes bought through a shared ownership scheme had been staircased up to 100% . However, a rent is often charged on the retained equity – typically around 2.5%). Shared ownership generally works best with smaller homes – typical first time buyer properties such as 2 bed houses.
 - Housing association
 - DDC rental
- Funding Options
 - HRA balances
 - S106 / developer contribution
 - Capital receipts
 - right to buy receipts
 - other asset sales
 - recirculation of receipts from sales of developed properties
 - Prudential borrowing
 - HCA or other grant income

- Viability
 - Impact on the HRA balances
 - Impact on the HRA Business Plan
 - Equality Impact Assessment

Subject:	LAND ALLOCATIONS PRE-SUBMISSION LOCAL PLAN
Meeting and Date:	Special Cabinet – 1 October 2012 Extraordinary Council – 3 October 2012
Report of:	Mike Dawson, Director of Regeneration and Development
Portfolio Holder:	Councillor Nicholas Kenton, Portfolio Holder for Environment, Waste and Planning
Decision Type:	Key
Classification:	Unrestricted

Purpose of the report:	To request that Cabinet recommends to Council the Land Allocations Pre-Submission Local Plan is taken forward through the formal process to enable it to be adopted.
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Recommendation:	Cabinet recommends to Council that: <ul style="list-style-type: none"> (a) The Land Allocations Pre-Submission Local Plan and the accompanying Sustainability Appraisal and Habitat Regulations Assessment, as set out in Appendices 5 and 6, are agreed and taken forward to enable it to be adopted. (b) The Director of Regeneration and Development be authorised to make any necessary editorial changes to the Land Allocation Pre-Submission Local Plan, Sustainability Appraisal and Habitat Regulations Assessment, to assist with clarity, consistency, explanation and presentation. (c) The Director of Regeneration and Development be authorised to determine whether in the light of any representations received on the Land Allocations Pre-Submission Local Plan it should be submitted to the Secretary of State for independent examination..
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1. Summary

The Core Strategy is the overarching statutory planning document for the District and was adopted by the Council in February 2010. The Core Strategy identifies the overall economic, social and environmental objectives for the District and the amount, type and broad location of development that is needed to fulfil those objectives and identifies the overall objectives and development quantities for the District over the period to 2026. The Land Allocations Local Plan (the Plan), which was formerly called the Site Allocations Document in 2008, follows on from the Core Strategy. Its primary purpose is to identify and allocate specific sites that are suitable for development in order to meet the Core Strategy's requirements and makes a major contribution to delivering the Strategy. It covers the same plan period as the Core Strategy.

Specific development proposals for the sites identified in the Plan will need to gain planning permission before development can take place. The Plan has involved public participation and the Council is required to consider this, together with other relevant information (e.g. studies that have been undertaken since the Core Strategy was adopted) and decide what changes need to be made. The Plan is required to be published to enable another period of public representation before it can be submitted to Government for approval. This involves a public examination held by an Inspector. The Inspector will then recommend changes to the Plan or will reject it. Providing the Plan is agreed, the Council can then adopt it and it will become a planning policy document that forms an important part of the statutory Development Plan for Dover District and the growth agenda for the District.

2. Introduction

- 2.1 There is a great deal of information to take into account and the decision to agree the Plan is an important one for the District Council. One of the main purposes of the Plan is to identify land for future development in the District which will assist with delivering the Council's growth agenda. It also incorporates new areas of work (Heritage Strategy, Open Space Policy and Standards and Retail and Employment Update) that have been undertaken since 2008.
- 2.2 Members are now being asked to approve the Plan and the accompanying Sustainability Appraisal and Habitat Regulations Assessment (see paragraphs 2.13-2.14 of this Report for further details). This would enable a further period of public representation (8 weeks) which would take place prior to Christmas. After this has taken place, the Plan will be submitted to the Secretary of State and defended at the public examination; which is anticipated to take place in June/July 2013. The preparation of the Plan has been a major commitment for the Council in terms of Officer time and resources. The cost of the public examination will have major resource implications for the District Council in June/July 2013.
- 2.3 The main issue for the Plan is which settlements and individual sites are most appropriate to accommodate future development. Table 3.1 (page 15) in the Plan, which has been reproduced below, identifies the amount of development that is required in Dover, Deal, Sandwich and the Rural Area:

	Dover	Deal	Sandwich	Rural Area
Total identified in the Core Strategy	9,700	1,600	500	1,200
Less sites identified through Strategic Allocations (in Dover) and urban extension areas (in Deal and Sandwich)	-6,650	-680	-100	
Less sites identified through Planning Applications (includes completions, unimplemented full and outline consents)	-1,526	-715	-272	-340
Residual amount to be allocated in the Plan	1,524	205	128	836

- 2.4 The Plan, from page 20 onwards, identifies the number of houses that are planned for the various settlements.

Background

- 2.5 The Plan has already involved a number of opportunities for people, organisations, Town and Parish Councils and equality groups to submit comments on the contents of the Plan:

- Participation and engagement in order to identify the issues;
- Public consultation on the Site Allocations Preferred Options Document (March 2008); and
- Public consultation the Interim Consultation Document (October 2010).
- Public consultation on Open space policy and standards and proposed text for the Heritage Strategy.

- 2.6 After a 'call for sites' in 2005, the Council undertook public participation on the Site Allocations Preferred Options Document in 2008. This Document was then put on hold until the Core Strategy was adopted in 2010. As a significant time had lapsed the District Council undertook another call for sites in 2010 and undertook further public participation on the new sites in 2010 (this was called the 'Interim Consultation'). The Interim Consultation Document, which is available on the Council's website http://www.dover.gov.uk/regeneration_delivery/local_development_framework/site_allocations_document.aspx, includes all of the sites that were submitted to the Council at different stages in the process. It has been renamed 'Local Plan' to reflect the terminology in the National Planning Policy Framework (NPPF).

- 2.7 The Local Development Framework Policy Advisory Group has given extensive and careful consideration to all of the sites that are included in the Plan. Additional public engagement has been necessary in order for the new areas of work (Heritage Strategy, Open Space Policy and Standards and Retail and Employment Update) that have been outlined in this Report to be included in the Plan. The Plan has also taken into account the responses received to public participation on these new areas of work and a separate consultation on alternative access options to serve land at Sandwich Road in the village of Ash (see Appendix 1).

- 2.8 In considering responses the Council should bear in mind that while the public responses are valued and important, they are one strand of information to be considered along with a range of other factors.

Assessment of sites

- 2.9 The District Council has undertaken a Strategic Housing Land Availability Assessment (SHLAA) which has been updated to take into account new sites that were put forward at the 2010 call for sites. With input from specialists in conservation, ecology and highways (KCC), a more in depth analysis of approximately 300 sites has been undertaken of all the sites that have been put forward for development. Copies of the Site Assessment Forms and the SHLAA are available on the District Council's website http://www.dover.gov.uk/regeneration_delivery/local_development_framework

Equality Impact Assessment

- 2.10 An Equality Impact Assessment has been undertaken of the Plan. This has identified a number of issues in the Action Plan that Members do need to be taken into consideration – see Appendix 7.

Sustainability Appraisal and Habitats Regulations Assessment

- 2.11 Alongside the individual assessment of sites a Sustainability Appraisal (SA) has been used to help identify issues, test options and identify the preferred sites that the Plan has allocated for future development. The importance of the SA should not be underestimated as it is an integral part of the plan making preparation process as it is underpinned by requirements of the EU Strategic Environmental Assessment Directive. The Directive requires the appraisal to focus on ‘reasonable alternatives’ and ensure that “the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated” .
- 2.12 A Habitat Regulations Assessment has been undertaken of the Plan. This is a requirement of the EU ‘Habitats Directive’ 1992 and the Conservation of Habitats and Species Regulations 2010 that ‘land use plans’ (including local authority Local Development Frameworks) are subject to an ‘Appropriate Assessment’ if it is likely that they will lead to significant adverse effects on a Natura 2000 site (Special Areas of Conservation, and Special Protection Areas). As a matter of UK Government policy, Ramsar sites, candidate Special Areas of Conservation and proposed Special Protection Areas are given equivalent status. These protected sites are collectively known as ‘European sites’. The HRA is important as the Council cannot adopt the Plan if the HRA has identified that there will be an adverse impact on European sites. The HRA has applied the precautionary principle to these European protected areas in order to ensure that the Plan does not have an adverse effect on the integrity of these sites in the District.

Deliverability

- 2.13 One key point is that in accordance with paragraph 173 of NPPF the District Council needs to pay careful attention to viability, the costs of plan-making and decision taking in order to ensure that Plans are deliverable. Sites and the scale of development identified in the Plan should not be the subject to the scale of obligations and policy burdens that their ability to be developed is threatened.
- 2.14 The District Council has contacted all of the owners/agents of the sites that have been put forward for development in order to establish ownership details, existing use and the broad timetable for making their sites available for development. This information has been used to help inform the allocations that have been included in the Plan. Officers are progressing work on this Plan in tandem with the preparation of Preparation of the Dover District Council Draft Preliminary Community Infrastructure Levy (CIL) Charging Schedule which will be the subject of a separate Cabinet Report on 5th November 2012. The intention is that the period for public representations on the Draft Preliminary Charging Schedule would be undertaken alongside the Land Allocations Pre-Submission Local Plan once the CIL Charging Schedule had been agreed for consultation.

Information to be considered in taking the decision

2.15 There are six Appendices to this report (copies of Appendices 1 – 5 are available in the Members Room or the Internet):

➤ Appendix 1 – This is a companion of the recommended responses received at Preferred Options stage, Interim Consultation Document, Open Space Policy and Standards, access to land on Sandwich Road, Ash and proposed heritage text:

- Summary table of responses to comments received at the Preferred Option stage (3,000 comments) and the Interim Consultation Document (1,960 comments) starting with overarching issues followed by comments and responses to individual sites.
- Summary tables of responses to comments received on the proposed Coastal Change Management Areas (CCMAs). These are areas likely to be affected by physical changes to the coast. This resulted in 8 comments which were either in support or provided comments. The Plan has identified the type of development that is suitable, and not suitable, in CCMAs and how the Council will assess planning applications in CCMAs (see Appendix 6, Land Allocations Pre-Submission Plan, Annex 1 Development Management Policies).
- Summary tables of responses to comments received to the Open Space Policy and Standards. Consultation was undertaken in October 2011 on proposed quantity, quality and accessibility of open space in the Dover District and a draft policy for inclusion in the Plan. Standards were developed for publicly accessible green space, outdoor sports facilities, children's play space, community gardens and allotments and operational cemeteries. This resulted in 72 comments many of which were detailed points that can be addressed in forthcoming strategies that Council is intending to prepare. An Open Space Policy and Standards have been incorporated into the Plan (see Appendix 6 - Land Allocations Pre-Submission Plan, Annex 1 Development Management Policies).
- Summary tables of the responses to comments received on five access options to serve land fronting Sandwich Road, lying between 73 Sandwich Road, Cherry Garden Lane and to the rear of 44 to 58 New Street (LDF 04), in the village of Ash. Consultation was undertaken in February 2012 and resulted in 98 comments. The outcome of this consultation is that access to this parcel of land should be determined at the planning application stage (see Appendix 6, Land Allocations Pre-Submission Plan, Rural Areas, Local Centres, Chapter 3).
- Summary tables of the responses to comments received on the proposed heritage text and the guidance for planning decisions for inclusion in the Plan. Consultation was undertaken at the end of August 2012 and resulted in 42 comments (see Appendix 6 - Land Allocations Pre-Submission Plan, Annex 1 Development Management Policies).
- Sites that were submitted by Preston Parish Council after the Preferred Options consultation had closed.

➤ Appendix 2 – Executive Summary from the Retail and Employment Update. This work updates the retail and employment information that supported the Core Strategy.

➤ Appendix 3 - Duty to cooperate. Public bodies have a duty to cooperate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities. This duty to cooperate focuses on Local Plans and will be the first test in the forthcoming public examination. It cannot be undertaken retrospectively and needs to be demonstrated at submission stage. In order to address this important point, neighbouring local planning authorities (Canterbury, Thanet and Shepway), Ashford Borough Council and Kent County Council were invited to participate in the Retail and Employment Update and provide comments on an early draft of the Plan on cross boundary issues.

➤ Appendix 4 - Site Assessment Forms. As this appendix includes a detailed assessment of approximately 300 sites it has not been included in this report. The individual site assessment forms are available to view on the Council's website and paper copies are available in the Members' room.

➤ Appendix 5 – Sustainability Appraisal (SA) and Habitat Regulations Assessment (HRA) which have directly informed the preparation of the Plan and the individual sites that have been allocated for development.

➤ Appendix 6 – A copy of the revised Land Allocations Pre-Submission Plan that is recommended for approval for publication and submission. This version does not necessarily include all of the desired graphics and further changes to the text and presentational changes may well be needed in order to improve the document for publication. This may well include further editing but all of the key principles and decisions are in the document and would be unaffected by the preparation of the Plan for submission to the Planning Inspectorate. The recommendation, therefore, seeks delegated authority for the Director of Regeneration and Development in be authorised to agree any subsequent editorial changes to assist with clarity, consistency and explanation.

➤ Appendix 7 – Equality Impact Assessment of the Plan.

3. Identification of Options

3.1 There are two options to consider, whether the Council proceeds towards public participation in accordance with the recommendations in this Report or it could vary the recommendations.

4. Evaluation of Options

4.1 It is open for the Council to not agree the pre-submission Plan but this would have serious consequences. Work on this Plan started alongside the Core Strategy in 2006, with the publication of the Preferred Options Document in 2008 and the Interim Consultation in October 2010. On the advice of the Government Office priority was given to preparation and the adoption of the Core Strategy.

4.2 As there has already been a considerable delay in the publication of the Plan this has caused uncertainty for residents, developers, landowners, Parish and Town Councils in terms of which settlements and sites the Council wishes to allocate for future development. Delay in proceeding towards submission would also undermine the Adopted Core Strategy as the purpose of this Plan is to identify the site specific

allocations and designations in Dover, Deal, Sandwich and the rural areas that will be required to deliver the vision set out in the Core Strategy.

5. **Resource Implications**

- 5.1 2011/2012 £300 required for consultation on the Land Allocations Pre-Submission Local Plan. 2012/2013 £160,500 (£100,000 for the public examination, Programme Officer £30,000, Printing costs of the Proposals Map £10,000, Printing costs of the Local Plan £15,000, Publicity for the Adopted Local Plan £500 and Interactive Proposals Map £5,000).

6. **Corporate Implications**

- 6.1 Comment from the Section 151 Officer: Resource requirement is covered by use of the LDF reserve (£161k), which was budgeted for 2012/13 and included in the MTFP. Finance has no further comments to add (MC)
- 6.2 Comment from the Solicitor to the Council: The Solicitor to the Council has been consulted in the preparation of this report and has no further comments to make.
- 6.3 Comment from the Equalities Officer: The Equality officer has been consulted during the development of this 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>

7. **Appendices**

Appendix 1 – Companion of recommended responses received during public engagement on the Land Allocations Pre-Submission Local Plan

Appendix 2 - Executive Summary from the Retail and Employment Update

Appendix 3 - Duty to cooperate.

Appendix 4 – Site Assessment Forms

Appendix 5 - Sustainability Appraisal and Habitat Regulations Assessment

Appendix 6 - Draft Land Allocations Pre-Submission Local Plan.

Appendix 7 – Equality Impact Assessment

[Appendices 1-5 are large documents and are available on the Council's website and in the Members' Resource Room]

8. **Background Papers**

The LDF evidence base

Contact Officer: Adrian Fox, Principal Planning Officer, Regeneration Delivery.



**Appendix 1
Representations Summary Tables
Preferred Options and Interim Consultation**

**Planning Advisory Group
13th September 2012**

**Cabinet
1st October 2012**

**General Representations
Preferred Options Stage
Summary Table**

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Whole document	All the sites in this document should be assessed against the records held in the Kent County Council Historic Environment Record and the Council's own database of historic environment assets. Consultation with the conservation team, Dover Museum and other sources of information on the heritage of the borough should be used to inform the selection and appropriate development of the sites included in the document.	The District Council has, together with KCC and English Heritage, produced the Dover District Heritage Strategy. This has assessed all sites against 13 historical themes.	Reflect the findings and recommendations contained in the Heritage Strategy in any allocations in the Land Allocations Local Plan.
Introduction	CPRE object to the Council's preferred option that would see at least 10,000 dwellings built during the Plan period. We consider that Option 2, which would see 8,100 dwellings built by 2026, should be the preferred option. This would mean that just a further 320 dwellings would need to be provided for to meet the Option 2 target of 8,100 dwellings by 2026. We do not consider that this small number of dwellings justifies the identification of any greenfield land at Whitfield, and we are confident that through a comprehensive Strategic Housing Land Availability Assessment (SHLAA) appropriate opportunities can be found, including a re-assessment of appropriate densities and yield from the sites already identified.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy. The issues regarding Whitfield were considered as part of the Core Strategy	No Change
Introduction	The Site Allocations Document includes a number of SEEDA schemes. No objection to any of the sites but we note that development at Snowdown are reliant on an adequate labour supply in the rural area.	Since the Preferred Options consultation, the Council has undertaken a Retail and Employment Update. This has investigated the need for, and distribution of employment sites across the District. The Snowdown Colliery site is no longer considered suitable for employment development.	No change
Introduction	1) Sites are an important part of managing change and delivering sustainability and regeneration objectives. 2) Welcome proposals to regenerate Aylesham.3) Hard to support many of these proposals as they are predicated on an incorrect judgement on the desirability and need for development - see comments on the skewed objectives/focus and insufficient evidence in the Core Strategy 4) Preferable to establish the overall direction and consensus on the Core Strategy first 5) Analysis of a town (for example) is good but wider consideration should be given to drawing places together 6) Concern that with the range of sites supporting infrastructure will not be delivered 7) Danger of introducing unsustainable and unnecessary development which will damage local communities and is highly objectionable.	This representation covers many issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010 and contains Policy CP6. This Policy ensures that necessary infrastructure is in place to support new developments.	No Change
Introduction	Support the aims and objectives of Site Allocations DPD.	Noted	
Paragraph 1.1	As chairman of the Capel-le-Ferne parish Council, wish to keep the parishioners of the village upto date with any development within the area.	Noted	
Paragraph 1.1 - 1.5	As it stands we find this document unsound failing the test of soundness 4B. The documents are inconsistent with PPS25. This document includes allocations that do not concur with the findings in Dovers SFRA and as such are contrary to Planning Policy Statement 25 - Development and Flood Risk.	A review of all sites has been undertaken	Those sites within Flood Zone 3b not now be allocated (eg. Land at Cherry Tree Avenue, Dover) in the Pre-Submission Plan.

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
	<p>Bearing in mind the concerns by the Environment Agency identified in the Table and CS document above, we would strongly recommend that the Site Allocations document is reviewed to ensure compliance with the relevant PPSs/G and that relevant policies are referred to, particularly where there is a potential risk of pollution to the environment, harm to human health, detriment to the surrounding amenity or an unacceptable environmental impact (e.g. on our water resources and water quality) from a proposal or a combination of proposals.</p>	<p>The Council has ensured that all sites within Flood Zone 3b (the functional floodplain) are not considered for development. The Council has updated its Strategic Flood Risk Assessment, which forms a key evidence base document to the Plan.</p>	<p>Consequential changes to the Plan.</p>
<p>Paragraph 1.6</p>	<p>The reference to the role of the SA DPD helping to provide the planning framework for delivering Vision for Kent, is welcome. However, as in the case of the Core Strategy (the action points of which the SA DPD is intended to develop) the site allocations do not reflect the taking forward of many of the Vision for Kent's goals and priorities which are relevant to LDFs. For example, one of the Vision for Kent's goals is 'Protecting and enhancing the beauty and diversity of its (Kent's) countryside and the richness of its (Kent's) historic environment. In this respect there is very little mention of biodiversity and open space and, increasingly important, climate change. There should be more acknowledgement of the need to consider the direct and indirect impact of biodiversity when allocating development sites consistent with the emerging South East Plan and the adopted KMSP (Policy EN8). Policy QL7 of the Kent and Medway Structure Plan (KMSP) requires that, where important archaeological remains may exist, there should be archaeological investigation prior to the granting of any planning permission. However, only in the policy for one site allocation (St James's Area), is this requirement stipulated whereas there are several other allocations that are similarly endowed and this should also be required in those cases.</p>	<p>Work on Green Infrastructure, open space and standards have now been incorporated into the Land Allocations Local Plan.</p> <p>The KMSP is no longer part of the Development Plan. Issues relating to archaeology (a heritage asset) are considered in the NPPF under conserving and enhancing the historic environment. In addition, the District Council has completed a Heritage Strategy, which identifies heritage themes, including archealogy, which should be used to assess sites.</p>	<p>All sites have been analysed against the background of policies, Green Infrastructure and Biodiversity. Recommendations have also been made as to possible mitigation measures, if these are required for a site to be developed.</p> <p>A new heritage section will be included within the pre-submission draft.</p>
	<p>From a Biodiversity perspective this document is unsound failing the test of soundness 4B as the document is inconsistent with the requirements of PPS9 and the Water Framework Directive.</p>	<p>All sites have been assessed for Biodiversity interests.</p>	<p>No change.</p>
<p>Paragraph 1.11</p>	<p>You will need to consider how you inform people of the changes to planning regulations and the impact of these changes on the next stages of plan preparation (para 1.2 and 1.11 specifically).</p>	<p>The Council has an adopted Statement of Community Involvement which it identifies the processes by which the community will be engaged in consultation of plans, throughout their preparation. In addition, the team produces an E-mail Alert which individuals and organisations can register for.</p>	

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Section 2: Dover	In general terms we support the aims expressed in the Core Strategy with regard to the regeneration of Dover town, and the focus of development on brownfield land.	This comment is noted, the Land Allocations Local Plan seeks to ensure that all brownfield land opportunities within Dover are explored.	No change
Paragraph 2.1	Para 2.1 refers to the lobbying of GOSE to include the dualling of the A2. There would appear to be no reference to this in the Core Strategy.	The Council has included the A2 Lydden to Dover dualling within the Infrastructure Requirements Table that accompanies Policy CP6 in the Core Strategy.	No change. Policy TR4 in the Adopted Local Plan will remain 'saved'.
Paragraph 2.5	On the issue of population decline I think effort should be made to keep younger people by providing better facilities, especially in Dover. There are limited night life facilities in Dover. The promenade and surrounding area presents itself as a good outlet for bars and eating places, including outside seating areas.	The nightlife economy is recognised as an important component of a vibrant town centre. Each application will be treated on its own merits.	Noted
Paragraph 2.5	1) More attention should be paid to attracting more tourists to stay in Dover rather than simply driving through the Docks without stopping at the town's historic and beautiful assets. 2) Motorway and rest areas need to be cleaned up and a tidier and cleaner environment would encourage more people to visit, stay and spend money. 3) No mention in the LDF about the need for burial sites and how this going to be addressed.	1) The use of heritage assets for improving the tourism offer in the district has been highlighted in the Heritage Strategy. 2) This is the responsibility of the relevant highway authorities. 3) Work undertaken by DDC indicates that there is adequate burial provision in the district.	A section on heritage has been included within the Land Allocations Local Plan. Other issues are noted.
Policy SA5	CPRE support a policy along the lines proposed. Support and maximizing the delivery of affordable housing to build mixed and desirable neighbourhoods. Policy is supported but it is recommended that this Policy is combined with Policy DM8 - Affordable Housing in the Core Strategy. Affordable housing should be maximised to build mixed and balanced communities.	This is a matter for the Core Strategy and not the Land Allocations Local Plan.	No change
Paragraph 2.59	Maximum use of Empty Dwelling Management Order should be made, which provide local authorities with an additional enforcement option to bring back into use long-term empty homes where it is clear that owners are unwilling to do so voluntarily. This would reduce the need to 'divert' S106 funding. 1) Paragraph 2.59 makes no reference to empty properties in Deal and how this will be addressed. What is the figure for Deal? There may not be many but there are some and DDC should be tackling this. 2) A target of 40 homes per year from 2004 - 2008 is referred to in this paragraph but there is no mention of whether this has been achieved.	The District Council is working in partnership with KCC on the 'No Use Empty' scheme. This initiative seeks to improve the physical urban environment in Kent by bringing empty properties back into use as quality housing accommodation.	No change.
Paragraph 2.67	To ensure action is taken to bring empty properties back into use and to improve energy efficiency in building standards, local authorities need additional staff.	See response to 2.59 above.	No change.

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 2.138	Land safeguarded for A2 dualling. The land is likely to include archaeological remains and provision should be made for archaeological evaluation and mitigation in any proposed dualling scheme.	This issue is covered by the NPPF and Dover District Heritage Strategy.	A heritage section has been included within the Land Allocations Local Plan.
Policy SA13	CPRE support the safeguarding of land for the dualling of the A2 between Lydden Hill and the Duke of York roundabout. Supports a policy along the lines proposed. Support the dualling of the A2. Lydden Hill to the Duke of York Roundabout. The Policy SA13 should be deleted as other representations by Crest Strategic Projects Ltd on the Core Strategy and other LDF documents, have argued that the Council should adopt Option 4 with A2/ A256 link. This would remove the need for the safeguarding line set out in Policy SA13. It should be noted that the delivery of this scheme is reliant on a number of issues being resolved and is also subject to the regional funding and prioritisation processes. There is a risk therefore that it might not be delivered within the timetable of this LDF. However, by safeguarding the land, it allows the potential for this scheme to take place at some point in the future.	The Council notes the comments of support. A A2/A256 link is now no longer included within the Adopted Core Strategy.	No change.
Paragraph 3.1	The poor transport links to Deal, compared to those to Dover and Sandwich should be taken into account in the allocation of additional housing land. Additional housing should be provided as close as possible to existing and proposed opportunities for employment. This means, in effect that the majority of additional housing should be provided in Dover (including Whitfield) and Sandwich.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy.	No change.
Paragraph 3.2	Betteshanger is not the best opportunity to redress the level of outcommuting to work from Deal. Betteshanger is not in Deal for the purposes of sustainable travel to work from Deal. It does not obviate the need to additional land allocations for employment use. The statement that there is no identified need for employment land in Deal (SA 3.15), is countered by the acknowledged volume of outcommuting. It also confirms there is no labour shortage in Deal (CS 4.19)	Since the Preferred Options consultation, the Council has undertaken a Retail and Employment Update. This has investigated the need for, and distribution of employment sites across the District. Outline planning permission was secured on the site for employment floorspace, however this has now expired. The Employment Update recommends the retention of this site to meet the distribution of floorspace across the District to reflect Table 3.1 of the Core Strategy.	The Land Allocations Local Plan will continue to save Local Plan policy AS1

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 3.2	Deal High Street has some serious problems because; i) Traders and shop owners are using one hour on street parking to park all day; ii) free one hour on street parking bays in the upper end of the High Street/St Georges Church area narrows the road for traffic to flow safely. The pay on-street parking in King Street has the same effect; iii) There are too many blue badge holders parking on double yellow lines in the town area; iv) trade vehicles collecting, delivering or getting hot food take aways often block the main High Street. This situation, together with narrow footpaths, cause danger to pedestrians; v) I do not agree with the increase in parking charges in the District and have been informed that it is to cover your pension fund. This is stealth tax.	The issues raised are noted but they do not fall within the remit of this Land Allocations Local Plan.	Noted.
Paragraph 3.2	"The Town has an overriding residential character which is root of its appeal". Yes it is DDC policy so may houses that may well kill this charm.	This representation covers issues which were considered as part of the Core Strategy. Policy CP3 in the adopted Core Strategy identified the housing requirements for Deal.	No change.
Paragraph 3.3	The LDF slavishly follows the Environment Agency designation of flood risk zones when even the SFRA acknowledges that the modelling on which it is based is only as good as the information used. The lack of, and poor assessment of, that information is clear to any long term resident. From "the river Dour is an important coarse fishing river" (unless that includes schoolboys catching sticklebacks) to the lack of mention of the flooding in the Alkham valley within the last 10 years (2% risk historically) covers the range of seriousness of information flaws. To classify the failure risk of the sea defences at Sandown Castle at 100%, i.e. once a year, is patently absurd when they have been successful since they were constructed after 1978. The likelihood of actual tidal flood risk, compared to theoretical risk, at the edges of the 3a zones must be less than the risk of sudden run off accumulations or drain failure and in particular groundwater flooding as a result of higher water tables in periods of prolonged wet weather which cause streams to flow in otherwise dry valleys, in zones classified risk 1, because such events have been hist	The flood zones have been used to undertake a sequential approach to site selection (sites within Flood Zone 1 first, then Flood Zone 2 and so on) as prescribed in Government guidance. The Strategic Flood Risk Assessment also identifies Maximum Breach and RIZ, which takes into account flood defenses along the coast. This has been used to assess the suitability of sites that are within Flood Zones 2 and 3a.	No change.

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Location	Issues raised from Consultation	Consideration of Issues	Recommendation
	<p>with a frequency greater than the assumed theoretical risk frequency and have been more widespread than the minor localised event that are mentioned in the SFRA. To presume against development in lower actual risk Zone 3a areas in favour of higher actual risk Zone 1 areas without further assessment completely and improperly skews development away from areas where it would otherwise be most appropriate. The most obvious example is the delineation of the historical 1978 flood event on the SDLF map, although inaccurate in other directions, which shows the bunding effect of the Deal -Sandwich railway embankment, but the tidal flood risk area is defined as if it no longer exists. The level of actual risk within the Zone 3a risk area should be graded and mapped so that any sequential testing can be better assessed against true flood risk. Works that are essential to the protection of the current built area of Deal will inevitably and equally also protect land that would otherwise be suitable for development. There is no record of flooding ever getting any where near the limits suggested by the Environment Agency and no evidence th:</p> <p>There is no indication that any sequential testing, let alone the exception test has been done prior to the blanket omission of potential sites from the site allocation document. There is no logical consistency in bringing forward saved policies from the Local Plan yet ruling out adjoining sites with the same flood risk profile or permitting large scale development in other parts of the district in 3a designated areas yet refusing to contemplate them in Deal. It is strongly submitted that development in north Deal would easily pass the exception test at PPS25 para D9a) "it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk". Section 106 monies from all development in Deal should be hypothecated towards access and flood defense work for the town.</p> <p>As North Deal is in a flood area that will flood in less than 30 minutes of the seawall breaching what plans are in place to tackle this? Planning Committee and Officers have also be inconstant with their decisions with regard to building in this area.</p>	<p>The Council has ensured that all sites within Flood Zone 3b (the functional floodplain), the Maximum Breach and RIZ are not considered for development. This forms a key evidence base document to the Plan and was drafted with the Environment Agency.</p> <p>The Council has seperately commissioned consultants to examine the issues facing North Deal. There are complex issues, specifically concerning flood risk and transportation.</p>	<p>As the Study work has not yet concluded, the Land Allocations Local Plan does not make any allocations above the requirement for 1600 identified in the Core Strategy.</p>
<p>Paragraph 3.4</p>	<p>So why is this not being done?</p>	<p>The Environment Agency has very stringent requirements for development to take place in areas at a high risk of flooding. As a statutory consultee the Environment Agency makes comments as part of the plan-making process, and are consulted on all planning applications within such areas.</p>	<p>The Council works closely with the Environment Agency to ensure that all proposals will meet with their requirements, All representations made by the Environment Agency to the Preferred Options stage have been analysed.</p>

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Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 3.4	<p>1) Group concerned with at the effect of increased traffic loads on the road network in and around Deal.</p> <p>2) Extent of new building proposed for Deal, especially in light of your statement (page 19 of the Core Strategy) that "there are few employment opportunities resulting in high commuting". Long been recognised that the poor road network serving Deal has been a major contribution to the failure to attract new employment opportunities to the town and Deal is only served by two secondary routes (fig 3.1 of the Core Strategy) which are not much more country roads, and both carrying a high death toll. "3) Increased congestion of these roads has resulted in the growing use of Mongeham Rd as a rat run to access the Whitfield roundabout and the Eastry Bypass.</p> <p>4) There are no proposals in the Core Strategy to increase employment opportunities in Deal and the only suggested improvement to the road networks is the signalisation of the A2/A258 roundabout. This may result in a minor improvement in traffic flows on the A258 at peak times it will do nothing to limit the increasing use of Mongeham Road as a rat run."</p>	<p>Since the Preferred Options consultation, the Council has undertaken a Retail and Employment Update. This has investigated the need for, and distribution of employment sites across the District and the findings have been incorporated in the Land Allocations Local Plan. This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan identifies the housing requirements set out in the Core Strategy.</p>	
Paragraph 3.4	Flood Risk - the dyke in Southwall Road has not been dredged in the last 10 years.	This dyke has recently been cleared.	
Paragraph 3.5	Why do DDC think they know better?	The Community Strategy was prepared by the District Council with the community.	No change
Paragraph 3.6	Whilst links to the Vision for Kent (in 3.6) are commendable in setting the policy framework, the selection of goals from that document should include biodiversity (as indicated in our comment on 1.6). In 3.10 or another appropriate place, some acknowledgement should be made of the need to consider ways of supporting biodiversity when allocating land for development, including creating corridors between habitats to increase connectivity.	Work on Green Infrastructure, open space and standards have now been incorporated into the Land Allocations Local Plan.	All sites have been analysed against the background of policies, with particular reference to Green Infrastructure and Biodiversity. Recommendations have also been made as to possible mitigation measures, if these are required for a site to be developed.
Paragraph 3.6	Vision for Kent - wonderful set of words. Bullet point 7 - avoid development in the flood risk area - need to look at the development in Northwall Road.	The flood zones have been used to undertake a sequential approach to site selection (sites within Flood Zone 1 first, then Flood Zone 2 and so on) as prescribed in Government guidance. The Strategic Flood Risk Assessment also identifies Maximum Breach and RIZ, which takes into account flood defenses along the coast. This has been used to assess the suitability of sites that are within Flood Zones 2 and 3a.	No change

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General Representations from Preferred Options Stage

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 3.7	I do not believe there is justification for building on Greenfield sites (Sholden) in Deal. On the whole I support the plans for Deal except for the greenfields development at Sholden	This representation covers an issue which was considered as part of the Core Strategy. The Core Strategy was adopted in February 2010 and contains a three broad areas for expansion at Deal. Two sites, at Sholden, have been assessed and have resolutions to grant planning permission.	
Paragraph 3.8	Support for this paragraph. There is a need to improve the healthcare in North and Middle Deal area - unsure ho this is linked to DDC allowing the big 3 Doctor's away from North Deal. Other Doctor Surgeries are also being relocated. Support paragraph 3.8 - increased housing opportunities to help support employment areas at the former Betteshanger Colliery & in the Richborough area. SUPPORT PARAGRAPH 3.8 – increased housing opportunities to help support employment areas at the former Betteshanger Colliery & in the Richborough area.	The comments of support are noted. No change Since the Preferred Options a new community facility and Doctor's Surgery has opened in North Deal (Cannon Street) to replace the Allen Street Surgery.	
Paragraph 3.9	That there is no prospect of improvements to the A258 for 20 years other than safety measures which in turn will add to the peripheralisation of a major town in a district that is acknowledged in the LDF to be peripheral is unacceptable. No development should necessitate the extension of the 30mph speed limit beyond its present points. The speed limits plastered over the access roads to Deal already act as a deterrent to business that might otherwise be interested in relocating to Deal. Any signalisation of the Duke of York roundabout (CS p26) should not disadvantage traffic entering from the northern A258 arm and should be peak time only.	The level of development for Deal (1600 homes) has been set through the Core Strategy, which was adopted in 2010. Extensive evidence was drawn together, including an examination of transport issues, prior to ascertaining the future development potential. This plan does not seek to re-open this debate.	All sites have been analysed with close dialogue with Kent County Council Highways, to ensure that any proposed allocation would meet highway approval. No change.
Paragraph 3.11	Assumptions about extra employment possibilities in Deal should not be overestimated. Minter's Yard is strongly opposed and may well not be finally approved. The Betteshanger Colliery site's access road has been the subject of a lengthy dispute and is still closed long after completion.	Since the Preferred Options consultation, the Council has undertaken a Retail and Employment Update. This has investigated the need for, and distribution of, employment sites across the District. Minters Yard was the subject of a planning application which was approved planning permission.	

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General Representations from Preferred Options Stage

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 3.12	Vehemently object to this statement. Having indentified the level of out commuting there is patently a pool of labour that would appreciate the possibility of working closer to home.	Since the Preferred Options consultation, the Council has undertaken a Retail and Employment Update. This has investigated the need for, and distribution of, employment sites across the District and the findings incorporated into the Land Allocations Local Plan.	Incorporate the findings from the Retail and Employment update into the Land Allocations Local Plan.
Section 4: Sandwich	Whilst supporting development to provide vitality in the villages, reiterate objection to the assumptions behind the allocations - the necessity and lack of focus on environmental considerations.	Work on Green Infrastructure, open space and standards have now been incorporated into the Land Allocations Local Plan.	All sites have been analysed against the background of policies, with particular reference to Green Infrastructure and Biodiversity. Recommendations have also been made as to possible mitigation measures, if these are required for a site to be developed.
Paragraph 4.2	It is not certain that the Environment Agency proposals for flood defences for Sandwich and the Quay will be met entirely outside the scope of the plan. We suggest that a capital sum should be set aside in the plan for contingencies associated with these proposals.	Improvements to the flood defences at Sandwich are being progressed. The purpose of the flood defences are to defend the current situation for existing residents, rather than to release additional land currently within a high risk of flooding, for development. Accordingly a contribution for these defences would not be able to be sought.	No change.
Paragraph 4.3	Land at Richborough Power Station (see attached pdf) should be referred to in the Site Allocations Document and reference made to the potential uses for: Demolition Waste (Kent Waste Local Plan Policy W7); Waste Transfer Station (Policy W9); and Waste to Energy (Policy W11).	Agree that a reference to the potential uses to be included in the Sandwich section. The Kent Sites Mineral and Waste Local Plan is still in production and is likely to be adopted after the District Council Plan.	Include the text: 'This area has become a focus for waste industries and land has been identified in the Kent Minerals and Waste Local Plan for potential energy from waste, green waste treatment and for the treatment/materials Recycling facilities. Development proposals in this area should refer to the Minerals and Waste Local Plan. '
Paragraph 4.5	There is reference to, but no specific proposals for, the achievement of Dover District Council to provide, promote and develop a range of social, leisure and cultural activities.	Council's Community Strategy Sandwich- is this the same as the Sustainable Community Strategy?	

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General Representations from Preferred Options Stage

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 4.5	Whilst links to the Vision for Kent are commendable in setting the policy framework, the selection of goals from that document should include biodiversity (as indicated in our comment on 1.6).	Please see response to 1.6	Please see response to 1.7
Paragraph 4.9	<p>The Local Plan allocation referred to overlaps in part with land allocated for waste management/waste to energy use under saved Policies W7(1), W9 and W11 of the Kent Waste Local Plan (adopted March 1998). As such it needs to be stated that any development proposals will need to take account of this.</p> <p>Seek allocation of land at Ramsgate Road, Sandwich, for business, industry and storage and distribution uses. The area is currently allocated under Policy AS14 in the District Local Plan, but once this Policy is lost after the SAD is adopted, there would be no policy guidance. The land would be outside the urban confines of Sandwich and effectively in the countryside, where there would be a presumption against development.</p>	<p>Reference to the Minerals and Waste Local Plan is to be added (please see 4.3 above).</p> <p>No new land has been identified and the area has been developed. Any redevelopment would be subject to the NPPF and Development Management Policies. It is not necessary to allocate land.</p>	See additional text for paragraph 4.3

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
	<p>Object to omission of a site specific policy for land subject to Policy AS14; the saved policy in the Adopted Local Plan 2002 will be superseded in due course by the Site Allocations Document and Core Strategy Development Management Policies.</p> <p>New policy should support uses in Class B1, B2, B8 (as in Policy AS14) and in addition retail sales of motor vehicles (Use Class A1).</p>		
Policy SA25	<p>Lands within the Borough remain safeguarded under the CTRL directions.</p> <p>We query whether this policy is necessary given that the safeguarding was solely for the purpose of constructing the rail link (siding) and suggest that the District Council consults with Union Railway on this matter.</p> <p>CPRE support the safeguarding of land at Richborough Power Station for rail development The future of the site requires clearer definition. Bearing in mind its situation, open to flood risk, subject to possible future potential for mineral extraction and designation as a facility in the event of further Channel Tunnel Rail Link development, it should be cleared and left vacant as a natural area. This is of particular importance as it adjoins an area already designated as SSSI and Ramsar importance as designated by European law. Any attempts to 'list' the cooling towers should be strongly resisted; they have no architectural merit and 'listing' would lead to heavy future maintenance costs.</p> <p>As the CTRL is now fully functioning, this safeguarding should be removed and this policy deleted. Dover District Council and Thanet District Council should liaise with the Secretary of State for Transport to have this removed.</p>	<p>The Safeguarding is a directive from Government. This has not been lifted.</p> <p>There are policies in the Kent Waste Local Plan that deal with the former power station site.</p> <p>The cooling towers have now been demolished.</p>	No change.

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Section 5: Rural Area	Let Eythorne see some of this regeneration to improve the quality of life here but also keeping it rural. 5 - Rural Areas 5.2 states the former coal mining areas are undergoing a program of regeneration. Having read this document I can see no plans, apart from housing, proposed for the Parish of Eythorne. In case DDC cannot remember Eythorne parish was formerly the home of the Tilmanstone colliery and since its closure no regeneration has significantly happened on this site apart from businesses that generate a great deal of heavy goods vehicles that travel through the parish causing unnecessary problems. It would seem to me that other areas are benefiting from regeneration but not Eythorne.	Land Allocations Local Plan includes policies for housing, employment and retail, which all have a reasonable prospect of being delivered within the Plan period. The Council has undertaken a Retail and Employment Update which considered whether the Saved Local Plan allocation (LE10) at Tilmanstone should remain.	Delete Policy
Section 5: Rural Area	Whilst supporting development to provide vitality in the villages, reiterate objection to the assumptions behind the allocations - the necessity and lack of focus on environmental considerations.	Work on Green Infrastructure, open space and standards have now been incorporated into the Land Allocations Local Plan.	All sites have been analysed against the background of policies, with particular reference to Green Infrastructure and Biodiversity. Recommendations have also been made as to possible mitigation measures, if these are required for a site to be developed.
Paragraph 5.1	Another re-think about the number of buildings required would be in order.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy.	No Change
Paragraph 5.5	The Council are proposing four classifications for rural settlements: Rural Service Centre, Local Centre, Village, and Hamlet. The statement on Settlement Hierarchy in the Site Allocation document is very ambiguous and either needs re-written in plain English or some explanation as to what it means by way of example. It is clear both what a Hamlet is and that it is not suitable for further development, but what does "the role of a service provider of services to essentially its home community" mean under Villages and equivalent statements regarding the other categories. If for example under Villages the classification refers to sustaining Shops, Pubs and Churches then it would help if these were given as examples. If this category is meant to imply that development will only be allowed that is intended for existing villagers such as affordable housing then it should say also so. As it stands the statements are open to interpretation and frankly meaningless.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and contains Policy CP1 which sets out the Settlement Hierarchy. The Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy.	

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General Representations from Preferred Options Stage

Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Paragraph 5.6	Shepherdswell should not be designated as a Local Centre because of the inadequacy of the road access.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and contains Policy CP1 which sets out the Settlement Hierarchy.	No change
Paragraph 6.1	No reference is made to the Kent Waste Local Plan (Adopted March 1998). This is despite certain policies from this document having been saved, as directed by the Secretary of State. The 3 policies which apply to this site (see attached pdf for site plan) have all been saved - W7, W9 and W11.	This section is to be deleted. Reference to the Kent Minerals and Waste Local Plan has been made in another section.	Amend the Plan accordingly.
Paragraph 6.6	Strong object to any further housing being built in the South East Region, with the following reasons: 1. The South East Region is already overcrowded in comparison with the North of the Country. 2. The South East Region is a subject to water shortages. 3. The South East Region is a subject to an increasing lack of green areas excluded from development. 4. Over-development of the South East Region has destroyed the character and amenities of the region.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy.	No change
Paragraph 6.17	The number of dwellings being entertained for the area of Deal and Dover leaves me very concerned that the road infrastructure will not cope with the increase of traffic and in particular the increased number of private cars. There is not the money available from the Government to provide an integrated transport system. So the only way to progress a journey will be by the use of your own private car. I suspect as a consequence we will see a marked increase in the number of instances of road rage.	This representation covers issues which were considered as part of the Core Strategy. The Core Strategy was adopted in February 2010, and the Land Allocations Local Plan will make allocations to meet the housing requirements set out in the Core Strategy.	No change
Appendix A: Summary Tables	The allowances made for 'other' contributions to residential development including windfalls and reduction in vacant homes should be quantified. Some of these figures are already in the Core Strategy and should be cross referenced.	Since Preferred Options government guidance has changed. The Council will no longer take account of a reduction in vacant homes. For windfalls, the Council will clearly set out the assumptions which have been made.	All assumptions made will be in line with government guidance, and the plan will clearly set out the assumptions made.

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Location	Issues raised from Consultation	Consideration of Issues	Recommendation
Table A2: Predicted Residential numbers	<p>Objection to formulation of "predicted residential numbers" - table A.2, Appendix 2. Notwithstanding the figures for "allocation sites" (to be re-assessed in light of representations to the core strategy), we object to the inclusion of: - windfall allowance, and - reduction in vacant homes within the "other sites" predicted residential numbers. There is no supporting evidence to suggest that a reduction in vacant homes would or could contribute to the housing land supply. The "respond justification" at Paragraph 2.59 to 2.63 suggests that the majority of identified empty properties are in Dover. Now under existing "strategies" the identified number of empty properties (in 2005) should have been reduced to 72. We query whether this "recourse" should contribute to the housing land supply calculations resulting in a predicted figure of 4 units per year over the plan period.</p>	<p>Since Preferred Options government guidance has changed. The Council will no longer take account of a reduction in vacant homes. For windfalls, the Council will clearly set out the assumptions which have been made.</p>	<p>All assumptions made will be in line with government guidance, and the plan will clearly set out the assumptions made.</p>

**General Representations
Interim Consultation Stage
Summary Table**

Location	Issues raised at Consultation	Consideration of Issues	Recommendation
General	(1) The need for additional homes in the Dover District is based on false assumptions. Where are all the new jobs going to come from that requires this additional house building? Most of the evidence base for the strategy was gathered prior to the recession, and this has changed the outlook for economic growth massively.	The Core Strategy sets out the overall ambitions and priorities for the District to 2026 and is considered to be flexible enough to meet any change in economic circumstances.	No change required
Para 1.1	(1) The view that it is problematic for the district to have an aging population profile needs to be reviewed in current circumstances: (1) it is more likely that people will carry on working past traditional retirement ages, and remain economically active (at least part-time) for longer; (2) many quite affluent people move to the area on retirement, adding to local purchasing power (the "grey pound"); (3) older people are more active in the community, the backbone of the voluntary sector - as well as needing on average more support, e.g. from health services.	The demographic work undertaken by the Council for the Core Strategy has taken the aging population and the positive contribution they make into account. It is necessary to plan for the needs of a wide range of people.	No change required
	(8) Any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. Our primary concern is the impact of any proposed development on the A2 and A20. A timeline for development should be included. It is the Trust view that specific policies should be devised within the Site Allocations DPD for district wide Green Infrastructure and European site mitigation. We recommend that there also be an analysis of the in-combination impacts on the SSSIs and Local Wildlife Sites within the District as many of the sites identified will lead to increased pressure on these important core areas within the Green Infrastructure. Connections should to be made within and between sites to form a fully connected Green Infrastructure network. Baseline data should be collected for this.	Many of the issues raised are noted (Highways, flood risk, surface water & foul drainage). The District Council has undertaken a HRA of the Core Strategy and the Land Allocations Local Plan. Work on green infrastructure has been progressed since the adoption of the Core Strategy. Issues of contaminated land will be considered as part of any planning application. The District Council welcomes the invitation for further assessment of the sites by Southern Water.	No change required

Location	Issues raised at Consultation	Consideration of Issues	Recommendation
	<p>Flood Risk There may be sites at risk of flood from tidal or other sources when they are examined in detail. Developers should talk to the District Council at the earliest opportunity.</p> <p>Contaminated Land A lot of the allocated sites lie on brownfield land. In line with PPS23, a desk study and preliminary risk assessment should be produced prior to any brownfield site obtaining planning permission. We will object to development on brownfield land where the principles of PPS23 are not being applied at the planning application stage.</p> <p>Surface Water Drainage; we will support the use of SUDs for surface water drainage provided an appropriate level of risk assessment demonstrates the ground conditions are suitable.</p> <p>Foul Drainage; Prior to granting planning permission at individual sites, it should be ensured that adequate sewage infrastructure is available.</p> <p>We anticipate that the Council will refine the site options before submission of the Site Allocations Document. Southern Water would welcome the opportunity to assess capacity for each site once the options have been refined, and the scale of development is known at each site.</p> <p>Ofwat takes the view that if investment is required to local infrastructure to service new development, then water and sewerage companies should seek to finance this work through securing contributions from developers.</p>		
Para 1.5	The Parish Council have informed the residents through our local monthly newsletter known as the "Grapevine". This takes considerable time to organise and we feel this could have been advertised to a much greater extent or have extended the consultation period to ensure you receive all appropriate views.	The consultation was for an eight week period and publicised in accordance with Government Regulations. The District Council also informed Parish Council's before the consultation and invited them in for a discussion before the consultation commenced. The Local Development Scheme also sets out the stages in the production of the Plan.	Noted
Para 1.12	<p>(2) Can confirm the MOD has no statutory safeguarding concerns subject to development in 'Lydden' being no higher than 45.7m above ground level. The remaining sites fall outside of statutory safeguarding zones therefore the MOD has no safeguarding concerns.</p> <p>CAA has no comments to make.</p>	Noted	No change required

Location	Issues raised at Consultation	Consideration of Issues	Recommendation
Para 1.13	<p>(2)</p> <p>Short Consultation Time Concerns May we remind the forward planning Team that DDC is signed up to a COMPACT which encourages consultation times of twelve weeks & concerned that eight weeks is insufficient time to consult parishioners properly, and prepare a response in the DDC preferred format.</p> <p>Brett Group have no comments to make.</p>	Please see response to paragraph 5.1 above.	Noted
Para 1.14	<p>(1)</p> <p>Natural England recommends that the potential direct and indirect impacts upon statutory nature conservation sites (Sites of Special Scientific Interest (SSSIs), Special Areas of Conservation (SACs) Special Protection Areas (SPAs) and Wetlands of International Importance under the Ramsar Convention (Ramsar Sites)) should be considered fully when assessing the merits of sites.</p> <p>Natural England recommends that consideration of impacts upon the District's green infrastructure should be fully considered when assessing individual sites.</p> <p>Key Question 3 Natural England considers that the level of development that is appropriate for each site should be based upon a number of factors including: The impacts upon nationally important landscapes (Areas of Outstanding Natural Beauty (AONBs) and/or Heritage Coasts) The impacts upon statutory nature conservation sites The impacts upon areas of high quality biodiversity habitat or sites supporting species of conservation importance.</p>	The issues raised have been considered in each of the site assessments.	No change required

Dover Representations Summary Table

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL066	Eastling Down Farm, Sandwich Road, Whitfield Area	<p>Total reps: 5 Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Greenfield site, no justification for any building given the dereliction in the centre of Dover, no shops or other facilities nearby, greatly increase car use through Whitfield village.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>No justification for further building on greenfield sites given the enormous allocation of home sites already approved for Whitfield.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the site in relation to the allocated Whitfield Expansion Area located to the south. Other comments raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable given that the Masterplan for the Whitfield Urban Expansion has recently been adopted. The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Only 268m away from DO03 Eastling Wood Ashley LWS designated for its ancient woodland and is likely to have in combination impact with the large development planned for the Whitfield extension on Lydden to Temple Ewell SAC. This site should be factored into any assessment undertaken for the WUE and appropriate mitigation provided (KWT).</p>		
		<p>The site is well located as sits just north of Whitfield, off a spur from the Sandwich Road and is served by two bus routes, running between Dover and Ramsgate and between Dover and Canterbury; The site does not form part of an Area of Outstanding Natural Beauty, even though it falls within the Local Plan's zoned Special Landscape Area; The site does not lie near to any conservation area and does not fall within a flood risk area; Would not have adverse impact on the immediate surroundings.</p>		

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Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
LDF28	Land adj. Royal Oak, Sandwich Road, Whitfield	<p>Total reps: 5</p> <p>Only if it acceptable to neighbouring residents - overlooking & amenity. Infill sites spoil the charm and character of our village now.</p> <p>Sensitive site - if developed need to avoid an abrupt and unsympathetic transition between town and country.</p> <p>Possible Roman burial close to the site. Redevelopment of this site should include a requirement for a programme of archaeological works.</p> <p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in-combination with the WUE and other sites within the Whitfield area.</p>	<p>Since these representations were made, a planning application has been granted, and implemented.</p>	<p>As planning permission has been implemented it is now no longer part of consideration for the Land Allocations Local Plan.</p>
SAD12	Royal Oak, Sandwich Road, Whitfield	<p>Total reps: 6</p> <p>The site should be allocated because; it is brownfield land; PPS3 encourages LPAs to meet housing needs in suitable locations which offer a good range of community facilities and with good access to jobs, key services and infrastructure; is within the Dover Urban Area; Development would create a greater mixture of market housing; and no significant planning or environmental constraints.</p> <p>Should only be developed if acceptable to neighbouring residents</p> <p>Objection by Whitfield PC because (although acknowledges that this site has PP): Should be part of Masterplan; No need for additional houses in village and would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p>	<p>Since these representations were made, a planning application has been granted, and implemented.</p>	<p>As planning permission has been implemented it is now no longer part of consideration for the Land Allocations Local Plan.</p>
		<p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in-combination with the WUE and other sites within the Whitfield area.</p> <p>Significant archaeology could be dealt with through suitable conditions on a planning approval (KCC Planning).</p> <p>Impacts should also be assessed in relation to impacts that they will have on the SAC in combination with the WUE and other sites within the Whitfield area (KWT).</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
LDF27	Car Parking Area and Girl Guides Hall off Guilford Avenue, Whitfield	<p>Total reps: 6</p> <p>This site should only be developed if it acceptable to neighbouring residents.</p> <p>Support from CPRE & St Margarets at Cliffe PC.</p> <p>Given the broad archaeological potential of Whitfield, redevelopment of this site should include a requirement for a programme of archaeological works.</p> <p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in-combination with the WUE and other sites within the Whitfield area.</p>	<p>The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.</p>	

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD11	Land between Guilford Avenue & Sandwich Road	<p>Total reps: 3</p> <p>This site was partially redeveloped with housing in the recent past, and it is our wish to complete a residential development in the medium term. The site has access to Guilford Avenue. The frontage to Sandwich Road is the subject of a TPO, as are a number of trees within the site, however this can be designed around.</p> <p>Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in combination with the WUE and other sites within the Whitfield area.</p>	<p>The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.</p>	
		<p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>It is unacceptable to have any further sites developed in the Whitfield area. None of the sites should be approved for use without being fully appraised as part of the Whitfield Masterplanning process (Whitfield Parish Council).</p>		
SAD10	Guilford Avenue Play Area, Whitfield	<p>Total reps: 4</p> <p>The play area should also be included within LDF27.</p> <p>Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in-combination with the WUE and other sites within the Whitfield area.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>It is unacceptable to have any further sites developed in the Whitfield area. None of the sites should be approved for use without being fully appraised as part of the</p>	<p>The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.</p>	
		<p>Should be assessed in relation to impacts that they will have on the SAC in combination with the WUE and other sites within the Whitfield area (KWT).</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
LDF026	Former Esso Station	<p>Total reps: 11 Is this site deliverable - contamination.</p> <p>Although a small development & located within the urban area, the impact should also be assessed in relation to impacts on the SAC in-combination with the WUE and other sites within the Whitfield area.</p>	<p>Since these representations were made, the site has been sold and is intended to operate as a Petrol Filling Station.</p>	<p>As the site will be operating within its permitted use, it is now no longer part of consideration for the Land Allocations Local Plan.</p>
		<p>This site should only be developed if it acceptable to neighbouring residents.</p> <p>Support from CPRE.</p> <p>The requirement for a programme of archaeological works is welcome.</p> <p>Do not support the policy in respect of criterion (ii). The retention of a drive-through restaurant immediately adjacent to a newly developed residential site is anachronistic, particularly because of its 'important location as a the gateway to Dover'.</p> <p>There is capacity for Foul sewer</p> <p>Site could be affected by improvements to the A2. Any development of the site is likely to require a transport assessment because of its possible effect on the trunk road and close proximity to the roundabout.</p> <p>This development should not impact on the operation of Whitfield roundabout and the Highways Agency would wish to be involved in the site specific policies for this development.</p>		
SHL077	Land south of A2 and Herald Wood,	<p>Total reps: 26</p> <p>Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and surrounding area; Would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Object because: Herald Wood would be destroyed; Who will buy these houses; The A2 is still a single carriage-way at this point and Whitfield is congested;</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, the recreational and biodiversity interests, problematic access arrangements and distance from local services and facilities. Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Prominent position - detrimental landscape impact - loss of biodiversity - merging of Whitfield with Temple Ewell.</p> <p>Support - It's close to existing dwellings Temple Ewell and Whitfield. It is adjacent to the A2. Low agricultural value (grade 3). Screened by woodland.</p> <p>Loss of a further green and attractive area; already becomes significantly clogged at peak times. I question the chances of employment; sensitive area adjoining Herald Wood; detriment of Temple Ewell.</p>		
		<p>Support - Easily accessible from the stretch of the A2; Herald Wood will be unaffected by the development adjacent and the contours of the ground will screen the development from the A2 direction.</p> <p>The loss of a very attractive green open space - loss of village identity; the effect of traffic from 610 more homes trying to get into and out of the village - the impact upon the existing local primary schools; so many disused brown sites in Dover.</p> <p>The need for more sites when the expansion of Whitfield hasn't even begun is unthinkable; enough empty properties and brown sites to be developed; we need to feed ourselves and not import food, every amount of land used for this purpose should be preserved. No buildings should be allowed on the south side of the A2.</p>		
		<p>Urbanising (or suburbanising) a tract of country between the villages of Temple Ewell and Whitfield, effectively creating urban sprawl (CPRE).</p> <p>Given the size of the area in question it is recommended that any development proposals for this site are accompanied by an archaeological desk-based assessment (KCC Planning).</p> <p>Is in the setting of AONB (Kent Downs AONB).</p> <p>Significant impact on the A2, particularly at the Whitfield roundabout; If the council intends to proceed included within the Whitfield Masterplan SPD and for the impact of it to be assessed in the accompanying Transport Strategy (Highways Agency).</p>		
		<p>Not in an area well served by public transport; would create additional traffic; have an adverse impact upon the surrounding areas of Whitfield; over crowding would risk bringing a number of social tensions into the area; blur the exiting identities of the various villages leading to loss of identity; some large sites for planned housing in the area that have not been developed; a much needed open 'green' space that is an asset; The current infrastructure of utilities is already at maximum capacity. There is insufficient education, health, shopping and other facilities in the area to support the existing population.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Precedent for development on the south side of the A2.</p> <p>Spoiling of woodland and landscape south east of Temple Ewell. Work of any sort is difficult to find in and around Dover.</p> <p>To propose the destruction of Herald Wood for housing when this disaster is still so clear in many local peoples minds and these trees are a memorial to friends and family of many Dover residents.</p> <p>The loss of a very attractive green open space, loss of the village identity would not wish to see the village urbanised, the effect of traffic from 610 more homes trying to get into and out of the village the impact upon the existing local primary schools.</p> <p>The Trust objects to the development of this site and has serious concerns regarding the impacts of the traffic emissions and the recreational pressure that will be generated from the WUE and other developments, on the SAC. No development should be located adjacent to the site (KWT).</p>		
		There is already considerable traffic congestion and parking issues due to the recent developments on Green Lane and The Avenue.		
SAD20	White Cliffs Business Park	<p>Total reps: 11</p> <p>To secure the continued viability and sustainability of this retail location, we consider that the importance of the retailing at the White Cliffs Business Park should be recognised in the Strategy.</p> <p>There should be a reference included in the Policy to the avoidance of light pollution.</p> <p>The out of town location of development may not contribute to key aims sufficiently especially given traffic impact on the A2 including Whitfield</p> <p>Policy SA3 would increase the traffic on the A2 and, if not accompanied by appropriate avoidance measures, would be likely to have a negative impact upon the integrity of the Lydden and Temple Ewell Downs SAC. Unless it can be established that mechanisms to avoid a negative impact could and would be put in place, the policy must be considered unsound.</p> <p>Should include requirement for a travel plan.</p> <p>B&Q should be excluded from allocation</p>	<p>The site performs very well in the Employment Update, particularly in place-making, balanced community and economy. There is also excellent transport access, and established employment uses surrounding the site. Given its high ranking the site warrants policy protection to ensure employment uses are retained.</p>	<p>The site is considered suitable for employment uses, although a more flexible approach will be considered to enable employment generating sui-generis uses. This should not include main town centre uses. A site specific policy will be included within the Land Allocations Pre-Submission Local Plan.</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>If further extensions to the White Cliffs Business Park are planned then any impacts due to increased vehicles and recreational pressure on Lydden to Temple Ewell SAC both individually and in-combination with other developments in the area should be assessed. There may also be in-combination impacts due to increased emissions on other chalk grassland SACs within the Dover area.</p> <p>Object to development because of loss of playspace, farmland and views (x5)</p>		
		<p>Foul sewer capacity assessments have indicated that there is capacity for this development.</p> <p>No vehicular access should be available to Roman Road.</p> <p>Any development will need to provide details regarding the levels of traffic generation to the site as it is likely to have impact on the wider road network including Honeywood Parkway and Melbourne Ave.</p> <p>Policy SA3 relating to employment allocations could be improved to include requirements for the preparation of green travel plans for these developments and for making workspaces more acidity friendly by developing opportunities for physical activity during and around the working day.</p>		
PHS007	Land between Dover Road and Melbourne Avenue	<p>Object to site due to loss of open space, impact on wildlife, infrastructure could not cope, no jobs, Dr's could not cope and no market for additional housing.</p> <p>Object to development because of loss of playspace, farmland and views (x5)</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape impact and loss of open space (playing fields). Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

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Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS02DOV	Land north of Frith Farm, St Martin's Road	<p>Total reps: 4 Object to any form of development.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Opposed on the grounds of overdevelopment of the parish, and retention of the rural character of Guston. There are few roads, limited pavements, limited school places, a restricted bus service, and the usual problems of sewage and limited water supply. There is no need or justification for including these sites (Guston Parish Council).</p> <p>In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions Kent Wildlife Trust is concerned that the addition over a thousand new houses within the immediate locality may cause an impact on the site which cannot be mitigated (KWT).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of biodiversity interest, problematic access arrangements and distance from local services and facilities.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
SHL029	Copthorne, Dover Road, Guston	<p>Total reps: 5 Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>The Council strongly support development of this site as it provides for a family sized dwelling that is in keeping with the needs of the village and its surroundings without impacting on the rural nature of the parish (Guston Parish Council).</p> <p>All the above sites are within 1-2km of the Dover to Kingsdown Cliffs SAC and SSSI. In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions which cannot be mitigated (KWT).</p> <p>Support - The Parish Council of Guston supports the inclusion of the site. The assessment in the SHLAA is incorrect (Physical Constraints, Ownership, Current Use, Access, Market and Local Services, Policy Alignment).</p> <p>Further development to meet requirements of the High Growth Strategy demands major infrastructure improvements in the North of the District if it is to be sustainable (Worth Parish Council).</p>	<p>The majority of the issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover. Since these representations were made, a planning application has been granted.</p>	<p>The site analysis form demonstrates that the site is unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Not within AONB, Heritage Coast, SLA, Conservation Area, Flood Risk Area or Nature Conservation designations; not utilising employment land; on a bus route and within walking distance of Dover town centre; there are no highway, access or parking problems; landscaped and not prominent; near local amenities; within the arc of the A2; immediately adjoining employment land.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS13DOV	Land to the west of Duke of York's School Area	<p>Total reps: 19</p> <p>Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and surrounding area; Would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Object to development because of loss of playspace, farmland and views (x5)</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the historic environment, wider landscape impact and loss of open space (playing fields). Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>More traffic to unsuitable roads. Communal grass area where children play. Has parking issues. An additional 40 homes would only make this worse. Power provision problems at times and an additional 40 homes would put even more strain on this. Local primary school is quite small. I am at a loss as a far more suitable site near the railway to the east of Guston has been rejected.</p> <p>Development with archaeological measures should be possible. (KCC Planning)</p> <p>Opposed on the grounds of overdevelopment of the parish, and retention of the rural character of Guston. There are few roads, limited pavements, limited school places, a restricted bus service, and the usual problems of sewage and limited water supply. Increase goods vehicle movement on roads that are not designed for such traffic or volume. There is no need or justification for including these sites for additional mixed use. (Guston Parish Council)</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Expect the traffic impact of these sites to be investigated before the document is finalised. (Highways Agency)</p> <p>But who is going to live in them? Insufficient industry/employment to support the current population let alone thousands more. Public services will continue to decline and be further stretched by the cuts. The Duke of York's is probably one of the best sporting facilities in the District.</p> <p>These would take away a major amount of the open space left for all forms of animal life.</p> <p>It would immediately devalue our properties. Enough sites under consideration already. Concentrate that money and effort into improving Dover Town Centre which is a disgrace. Significant loss of rural landscape. This proposal appears to contravene your policy DM25(iv). The only vehicle access to the site would be on to the A258 Dover-Deal road, on the notoriously dangerous bend opposite Broadlees Farm, or onto the Dover Road, Guston. No pedestrian footway. The area is already fully stretched in terms of utilities.</p>		
		<p>Within 1-2km of the Dover to Kingsdown Cliffs SAC and SSSI. If these sites were developed over 1000 new homes will be provided in the locality of the European site. In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions. (Kent Wildlife Trust)</p> <p>Proposed number of houses. Totally out of keeping within sight of our Historical and Heritage. The loss of habitat. Where are the jobs coming from to support these people in the Dover area.</p> <p>I don't want my view blocked by any more developments.</p>		
NS14DOV	Land to the south of Duke of York's School Area	<p>Total reps: 23</p> <p>Objection by Whitfield PC because: Should be part of Masterplan; No need for additional houses in village and surrounding area ; would add to the disruption and overburden to local infrastructure; Increasing the density of the existing built area with further backland development is unacceptable - need to retain existing character of Whitfield</p> <p>Object to development because of loss of playspace, farmland and views (x5)</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the historic environment, wider landscape impact and loss of open space (playing fields). Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>This proposal appears to contravene your policy DM25. Only vehicle access to the site would be onto Dover Road Guston. There is no pedestrian footway. The area is already hard pressed in terms of utilities. Impinges on the Groundwater Source Protection Zone.</p>		
		<p>More traffic to unsuitable roads. Communal grass area where children play. Has parking issues. An additional 40 homes would only make this worse. Power provision problems at times and an additional 40 homes would put even more strain on this. Local primary school is quite small. I am at a loss as a far more suitable site near the railway to the east of guston has been rejected.</p> <p>Development with archaeological measures should be possible. (KCC Planning)</p> <p>Opposed on the grounds of overdevelopment of the parish, and retention of the rural character of Guston. There are few roads, limited pavements, limited school places, a restricted bus service, and the usual problems of sewage and limited water supply. Increase goods vehicle movement on roads that are not designed for such traffic or volume. There is no need or justification for including these sites for additional mixed use. (Guston Parish Council)</p>		
86		<p>Expect the traffic impact of these sites to be investigated before the document is finalised. (Highways Agency)</p> <p>But who is going to live in them? Insufficient industry/employment to support the current population let alone thousands more. Public services will continue to decline and be further stretched by the cuts. The Duke of York's is probably one of the best sporting facilities in the District.</p> <p>These would take away a major amount of the open space left for all forms of animal life.</p> <p>It would immediately devalue our properties. Enough sites under consideration already. Concentrate that money and effort into improving Dover Town Centre which is a disgrace. Significant loss of rural landscape. This proposal appears to contravene your policy DM25(iv). The only vehicle access to the site would be on to the A258 Dover-Deal road, on the notoriously dangerous bend opposite Broadlees Farm, or onto the Dover Road, Guston. No pedestrian footway. The area is already fully stretched in terms of utilities.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Within 1-2km of the Dover to Kingsdown Cliffs SAC and SSSI. If these sites were developed over 1000 new homes will be provided in the locality of the European site. In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions. (Kent Wildlife Trust)</p> <p>Proposed number of houses. Totally out of keeping within sight of our Historical and Heritage. The loss of habitat. Where are the jobs coming from to support these people in the Dover area.</p> <p>I don't want my view blocked by any more developments.</p>		
		<p>The proposal is on land designated an open space in your Framework document published in February 2010. Contravene your policy DM25. The only vehicle access to the site would be onto Dover Road Guston. Dangerous. There is no pedestrian footway. The area is already hard pressed in terms of utilities. Development impinges on the Groundwater Source Protection Zone.</p> <p>The land in question is a communal grass area where children play. Burgoyne Heights estate already has parking issues. The local primary school is quite small.</p>		
		<p>Totally contravenes the policy of the new Conservative Administration where the policy is to encourage children to participate in school sport both competitive and social. Access to the development is not fit for purpose. Dover Road in Guston to Barton Road in Dover will become a totally unsuitable 'rat run' as it is single carriageway with passing places.</p> <p>Development with archaeological measures should be possible on this site. (KCC Planning)</p> <p>The foregoing are opposed on the grounds of overdevelopment of the parish, and retention of the rural character of Guston. Restricted bus service, and the usual problems of sewage and limited water supply. (Guston Parish Council)</p>		

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Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Would expect the traffic impact of these sites to be investigated before the document is finalised. (Highways Agency)</p> <p>The proposed development area has been used on numerous occasions as a landing area for helicopters carrying members of the Royal Family and other VIPs attending local events. The current school site provides a secure landing area for this. Destruction of numerous mature trees and several trees that have been planted in memory of past school pupils. In light of the significant development planned in Whitfield and also at Cannought Barracks.</p> <p>Loss of greenfield sites which are characteristic of the landscape of the North Downs.</p> <p>Insufficient industry/employment to support the current population. Public services will continue to decline and be further stretched by the cuts. The Duke of York's is probably one of the best sporting facilities in the District with so much more potential.</p>		
		<p>Loss of open space left for all forms of animal life.</p> <p>If these sites were developed over 1000 new homes will be provided in the locality of the European site. In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions Kent Wildlife Trust. May cause an impact on the site which cannot be mitigated. (Kent Wildlife Trust)</p>		
PHS004	Land to the north of A2, west of the A258 and east of railwayline.	Object to development because of loss of playspace, farmland and views (x5)	The majority of the issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS15DOV	Land adjacent to Burgoyne Heights Community Centre	<p>Total reps: 18</p> <p>Object to development site because: Change charater of estate; Problems with drainage and sewerage - existing pumping station not man enough for the job; Not enough parking and road network would not cope.</p> <p>Object to development because of loss of playspace, farmland and views (x5)</p> <p>An "inner core" of 40 houses would completely unbalance our unique Estate. Serious consideration must also be given to the problem of drainage and sewage. A small pumping station was also built on the Estate. This is in a poor state of repair. Our Estate would struggle with that amount of extra traffic. There is not enough car parking spaces at present without adding to the problem. With a large increase in traffic there are serious Health and Safety issues to be considered.</p> <p>Issue for all the children who live on this estate and deem it safe to play outside.</p> <p>The local primary school is quite small and only take on a small number of pupils a year.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the potential loss of open space, and distance from local services and facilities. Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Dover.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>No extension to existing properties has been allowed due to it detracting from the uniformity of the estate; I am sure 40 houses squeezed onto the field 30 years later would look particularly attractive!</p> <p>Development with archaeological measures should be possible on this site. (KCC Planning)</p> <p>Opposed on the grounds of overdevelopment of the parish, and retention of the rural character of Guston. There are few roads, limited pavements, limited school places, a restricted bus service, and the usual problems of sewage and limited water supply. Will increase goods vehicle movement. (Guston Parish Council)</p> <p>Loss of this valuable amenity land for the surrounding houses. (The Dover Society)</p> <p>But who is going to live in them? Unemployment is on the rise. Public services will continue to decline and be further stretched by the cuts over the next few years and Dover could be heading for a downward spiral from which it will never recover.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD15	Land at Melbourne Avenue, east of Archer's Court School Dover	<p>Total reps: 3</p> <p>This site should be considered for inclusion as a residential redevelopment, being a natural continuation of the urban boundary. The site is identified because of its extensive road frontage. This land and the proposed access are in Dover District Council ownership and is a short to medium term objective.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning)</p> <p>The Kent Wildlife Trust would object to any development within the LWS.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape and recreational interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
SHL062	Melbourne Community School, Melbourne Avenue	<p>Total reps: 5</p> <p>Object to non-allocation of Melbourne Community School site and land to the north for mixed residential and nursery development.</p> <p>Objection to the omission of site because; it is a redundant site no longer required and the development would enable reinvestment into KCC services; would accord with Core Strategy; sustainable location; could provide significant landscape and amenity benefits and has no comparable alternative within the vicinity.</p> <p>This site should be considered for inclusion within the site allocations document as it is an area of scrub land adjoining Melbourne CP School, a site that has been declared surplus to education needs. This site allows the school site to be rounded off.</p>	<p>Since the representations were made the former Primary School has re-opened as KCC offices. This part of the site has therefore been withdrawn from the process, but the land located to the north must be considered. The site analysis form demonstrates that in principle this site is suitable for development.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
		<p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Within 1-2km of the Dover to Kingsdown Cliffs SAC and SSSI. In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions. May cause an impact on the site which cannot be mitigated (KWT).</p>		
NS08DOV	Land at Wycherley Crescent	<p>Total reps: 2</p> <p>There is some potential for presently unknown archaeological remains to be present on the site (KCC Planning).</p> <p>Situated within Whitfield Down and Buckland Down LWS. As this development would lead to the loss of part of the Local Wildlife Site, Kent Wildlife Trust objects to this development (KWT).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL079	Dunedin Drive	<p>Total reps: 2</p> <p>This site is presently underused as a garage area and would benefit from residential redevelopment. This land and the proposed access are in Dover District Council ownership and is a short to medium term objective.</p> <p>In-combination with the impacts from other developments within Dover and the proposed port expansion which is likely to generate further recreational impact and emissions Kent Wildlife Trust is concerned that the addition over a thousand new houses within the immediate locality may cause an impact on the site which cannot be mitigated (KWT).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
SAD16	Land south of Egerton House, Roman Road, Dover	<p>Total reps: 5</p> <p>Although the site forms part of the wider area of Long Hill, it lies at the bottom of the valley and is separate from the higher area.</p> <p>It immediately adjoins the Girls Grammar School playing fields and has a dwelling to the north. It is level ground with easy access to the town centre and is available for development.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>No justification in building a number of homes in this very rural location. The site provides an important green buffer against planned and proposed development (Guston Parish Council)</p> <p>Object to this isolated site in open countryside.</p> <p>The Trust would object to any development within the LWS (KWT).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the landscape setting, capacity of the wider road network and distance from local services and facilities</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD23	Old Park Barracks	<p>Total reps: 11 Features relating to the military occupation of the site are also of interest and any standing military remains may warrant survey in advance of redevelopment.</p> <p>Paragraph 2.42 acknowledges that the site is visible from a number of vantage points, and we agree that great care will be needed in designing the development. In particular we consider that regard should be given to the need to avoid light pollution, and reference to this should be included in the Policy</p> <p>The out of town location of development may not contribute to key aims sufficiently especially given traffic impact on the A2 including Whitfield.</p> <p>The site immediately adjoins the Whitfield Down, Buckland Down etc Local Wildlife Site. This is not specifically mentioned in the supporting text to policy CP10, in spite of PPS9 and Defra's guidance to local authorities on achieving compliance with duty under the NERC Act.</p> <p>Foul sewer capacity assessments have indicated that there is capacity available.</p>	<p>Although the Employment Update does not recommend the retention of this site to meet the distribution of floorspace across the District set out in the Core Strategy it remains suitable for a particular function – namely port-related uses. However, only 988 sq m remains available, the other 18,955 sq m has the benefit of an extant planning consent.</p>	<p>The majority of the site is covered with an extant planning permission. Therefore a site specific policy will not be included within the Land Allocations pre-submission Local Plan</p>
		<p>The remaining land allocated for employment at the former Old Park Barracks is no longer necessary for port-related uses and this land should be re-allocated for housing development.</p> <p>Any increase in land allocation for B1/B2/B8 may require a Transport Assessment. Cycle / pedestrian access should be taken into account and adequate provision incorporated into any development.</p> <p>Policy SA4 relating to employment allocations could be improved to include requirements for the preparation of green travel plans for these developments and for making workspaces more acidity friendly by developing opportunities for physical activity during and around the working day.</p> <p>Should include reference to the need for adequate access by all modes of transport and should be supported by a transport assessment and travel plan.</p> <p>Old Park Barracks which is not only suitable for future residential development but is also available for development during the 2006-2016 period.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		Likely to have an impact on DO 15 Whitfield Down and Buckland Down LWS. As SAD23 is identified for employment the site will have less of an impact on the chalk grassland, ancient woodland and associated flora for which the LWS is designated. However employees may use the site for recreational purposes within their lunch hours. The Trust recommends that a resilient Green Infrastructure is designed into the development to ensure the employees have alternative recreational space thus relieving the pressure on the LWS.		
SHL070	Old Park Hill	<p>Total reps: 5 Potential for residential development. The site is within the Town Confines.</p> <p>The site is adjacent to Whitfield Down and Buckland Down LWS. Residential will place further pressure on the LWS if not mitigated adequately. If identified for housing recommended that the site contain; an extensive buffer where it abuts the LWS and adequate alternative natural space being provided to mitigate. The Trust would object to any development that leads to the loss or degradation of habitat within Whitfield Down and Buckland Down LWS.</p>	Since these representations were made, a planning application has been submitted. The site is located within the Urban Boundary.	Site to be allocated in the pre-submission local plan.
		<p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Adjacent to Whitfield Down and Buckland Down LWS. This will place further pressure on the LWS if not mitigated adequately. The site contains an extensive buffer where it abuts the LWS with adequate alternative natural space being provided to mitigate any impacts from recreational pressure on the adjoining LWS (KWT).</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL045	Manor Farmyard, Egerton Road, Temple Ewell	<p>Total reps: 3</p> <p>Support - Sustainable location and is well served by nearby bus routes and the railway station at Kearsney. The site is well screened and the removal of the unattractive and utilitarian farm-buildings will give planning gain to the amenity of the area.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>This site is adjacent to Temple Ewell and Lydden Downs LWS, which will receive increased recreational pressure. A buffer should be preserved around the site to protect the Local wildlife sites integrity. Consideration should be given to impacts in combination with other development planned within the area and in particular the WUE (KWT). The site is accessed from Egerton Road and is in a fold of land making it largely invisible until one enters the site. There will be a considerable planning gain in developing the site, the redundant farm buildings are unattractive and utilitarian and can only be improved upon with a sympathetic development of the site. In a sustainable location: the area is well served by bus routes close by and Kearsney Railway Station is only a short walk away. The site is well positioned</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. Access to the site is not considered suitable to support residential development and the development of the site should be resisted</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
SAD14	Land adjacent to Kearsney Station	<p>Total reps: 7</p> <p>This site should be allocated for residential development because it is a brownfield site, past history suggests that it would be suitable and the site is located close to rail and bus services.</p> <p>Any increase in traffic entering the Alkham Valley Road here would create considerable difficulty (CPRE).</p> <p>Development with some archaeological measures should be possible on this site (KCC Planning).</p> <p>The access is poor, it is too small and too near the railway. The land is likely to be contaminated and should be reserved in order to expand the existing car park.</p> <p>Consideration should be given to in-combination impacts on both Lydden to Temple Ewell SAC and DO41 Temple Ewell and Lydden Downland in-combination with other development planned within the area and in particular the WUE (KWT).</p>	<p>The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.</p>	
		<p>Although the highways matter has prevented development previously, it seems unreasonable to prevent housing when the site has for many years been used as a storage yard, with vehicle access, and the road is also used as a main access to a railway station, and as an overflow car park to the bowls club.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL050	Manor View Nursery, Lower Road, Temple Ewell	Total reps: 8 Detrimental impact on the landscape; potential for loss of biodiversity. The site is also close to a SSSI. Safe vehicular and pedestrian access to Lower Road; no intrusion into open countryside; of no practical use to agriculture; The retention of hedgerow planting along the boundaries and the resoration of the area would respect the existing loose knit character of the adjoining areas; No adverse effects on existing residential amenity; the site is available and has no physical constraints which would prevent development taking place.	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.
SHL057	Kearsney Court,	Total reps: 5 Include site so that it is within the settlement confines	Since these representations were made, the site has been withdrawn from the process.	The site no longer part of consideration for the Land Allocations Local Plan.
SAD13	Land to the south of Alkham Road	Total reps: 4 The site is immediately adjacent to the Area of Outstanding Natural Beauty. The addition of five houses would increase the traffic danger (to pedestrians particularly) and alter the quality of the area for the worse (CPRE). Development with archaeological measures should be possible on this site (KCC Planning). Close to Alkham, Lydden and Swingfield woods SSSI and consideration may therefore need to be given to providing some mitigation for recreational pressure, proportionate to the size of the sites (KWT).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
		The site is located near to a bus stop, local train station, shops and local amenities; The land is in a secluded location and does not intrude on any other residents; A suitable access from could be established onto either Alkham Road or Abbey Road; The site is graded to be at a moderate risk of flooding (1.3% - 0.5%).		
SAD17	Land to the west of the Dublin Man of War public house, River	Total reps: 3 CPRE support the proposed allocation. I was of the opinion RPC members would have been happy for this plot to be a car park? There is some potential for archaeological remains at this site. Redevelopment of the site should include provision for archaeological measures possibly in the form of a watching brief.	The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.	

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL098	Land at Crabble Athletic Ground to south west of Crabble Avenue River.	Total reps: 105 This site should be considered for inclusion as a residential redevelopment site. This site would only be brought forward if the Dover Rugby Club vacated the site for another, better premises in the Dover area. This site should be kept for the people of Dover.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, recreational interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
		Consider for residential redevelopment - would only come forward in the event of Dover Athletic Football Club vacating the site for more suitable premises elsewhere. This land and the proposed access are in Dover District Council ownership and is a medium to long term objective. Object to development because: used by residents; impact on residents life; Dover needs to retain as many green spaces and play areas as possible. It is a much needed source of entertainment something sadly lacking in the Dover area. There are plenty of 'brown field' sites or new areas outside of River that can be built upon.		
		Loss to the people of Dover and would ruin an area of outstanding natural beauty. Very popular for Dover residents. Development would have a devastating impact on our infrastructure and local facilities. 300 more cars, the village will come to a standstill. The impact on local schools, emergency services and other local services will be unreasonable. Any upheaval to be to the detriment of the Football Club. Gorse Hill is "Green Belt" land. River's identity as a village will also be lost as it will be engulfed by Dover. Object on grounds of both aesthetics and access. Number of unused properties in the district especially those in need of refurbishment. Most valuable recreational facility. Dover District has few sporting facilities. There are plans to develop sufficient housing elsewhere; b) insufficient additional places at River Primary School; c) shortage of 'green' space for high quality sporting use in the Dover environs. Important amenity to the area and very widely used.		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Encourage healthier lifestyles - Crabble plays an important part in this.</p> <p>Fairly steep in this area making life extremely difficult during periods of bad weather.</p> <p>Take yet another playing field away from our youngsters. Fuelling the crime wave as more and more youngsters become disenfranchised. The rugby club premises are also an important venue with the community.</p> <p>Green-space buffer between Dover and the Parish of River.</p> <p>No jobs in Dover.</p> <p>Beautiful coniferous and deciduous trees around the sports grounds and of course on Gorse Hill which is a stunning piece of Dover</p>		
		<p>As the land is owned by the District Council the question of planning consent would be a foregone conclusion. Secure employment has been continually declining in both public and private industries.</p> <p>River doesn't need anymore homes. It's all money money money, disgusting.</p> <p>Would affect the continuity of free access to Gorse Hill above this site.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>The only failing is that of the local government in not maintaining the Athletic Ground. Rather than losing such an asset, see the grounds improved and promoted as a continuing venue for sporting events at all levels.</p> <p>Support the proposal - Concerns voiced do not take into account the disruption caused by the significant increase in traffic and associated parking difficulties when the ground is in use, particularly for soccer matches.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>The only plausible plan would be to cut a swathe through Kearsney abbey and decimate, destroy this wonderful recreational area. Increased traffic will damage my property as my house is not designed to cope with the vibration of large, increased and consistent traffic. The drainage in the River area will not be able to cope with any increase in housing on this scale as it cannot cope now. What plans are you putting in place to provide other spots facilities and recreational areas? 13. What plans for improved drainage? How much increase in council tax will you be charging to cover all the costs?</p> <p>Services & amenities in general would not cope in their current state and would need improvement.</p> <p>Why not demolish the awful derelict buildings, the County Hotel and those other ugly buildings along that section of Townwall Street and build nice housing there.</p> <p>River has no areas for people to walk their dogs.</p> <p>The development at Whitfield is sufficient for this area.</p>		
96		<p>It would be nice for all Dover that the work was completed on previous developements such as the Town centre and Buckland Mill site before you start on any future plans.</p> <p>You would be better off to give the football ground or sell it to them,so they can plan the clubs future ,and anydevelopment that might need.</p> <p>Would effectively create a vast urban sprawl.</p> <p>Petition signed by 66 residents.</p> <p>Buckland Hospital would have additional pressure due to increase in patient numbers 4. GP surgeries would have increased volume of residents.</p> <p>There one SSSI and a number of Local Wildlife Sites within or adjacent to Dover which are likely to be impacted as a result of development within Dover (KWT).</p>		
		<p>I am also not in favour of developing the Dover Athletic ground. I am not a sports fan, but think that the area should be kept for the people of Dover. I have been to many other events that use the field.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL096	Land at Crabble Athletic Ground to south west of Crabble Avenue River	<p>Total reps: 101</p> <p>It is proposed that the area with TPO trees would be sympathetically developed with low density housing, the area of derelict hard tennis courts would be redeveloped with good quality housing. The site has had planning permission in the past; there is an existing access; and is within one ownership (DDC) and could come forward in the short to medium term.</p> <p>Options to development because: It is in constant use for sporting activities for all generations; The access is a single file road & how could it cope with more traffic; The exits from River are both already congested;</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, recreational interests and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Consider for residential redevelopment - would only come forward in the event of Dover Athletic Football Club vacating the site for more suitable premises elsewhere. This land and the proposed access are in Dover District Council ownership and is a medium to long term objective.</p> <p>Object to development because: used by residents; impact on residents life;</p> <p>Dover needs to retain as many green spaces and play areas as possible.</p> <p>It is a much needed source of entertainment something sadly lacking in the Dover area.</p> <p>There are plenty of 'brown field' sites or new areas outside of River that can be built upon.</p>		
		<p>Loss to the people of Dover and would ruin an area of outstanding natural beauty. Very popular for Dover residents. Development would have a devastating impact on our infrastructure and local facilities. 300 more cars, the village will come to a standstill. The impact on local schools, emergency services and other local services will be unreasonable. Any upheaval to be to the detriment of the Football Club. Gorse Hill is "Green Belt" land. River's identity as a village will also be lost as it will be engulfed by Dover.</p> <p>Object on grounds of both aesthetics and access. Number of unused properties in the district especially those in need of refurbishment.</p> <p>Most valuable recreational facility. Dover District has few sporting facilities. There are plans to develop sufficient housing elsewhere; b) insufficient additional places at River Primary School; c) shortage of 'green' space for high quality sporting use in the Dover environs.</p> <p>Important amenity to the area and very widely used.</p>		

66

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Encourage healthier lifestyles - Crabble plays an important part in this.</p> <p>Fairly steep in this area making life extremely difficult during periods of bad weather.</p> <p>Take yet another playing field away from our youngsters. Fuelling the crime wave as more and more youngsters become disenfranchised. The rugby club premises are also an important venue with the community.</p> <p>Green-space buffer between Dover and the Parish of River.</p> <p>No jobs in Dover.</p> <p>Beautiful coniferous and deciduous trees around the sports grounds and of course on Gorse Hill which is a stunning piece of Dover</p>		
		<p>As the land is owned by the District Council the question of planning consent would be a foregone conclusion. Secure employment has been continually declining in both public and private industries.</p> <p>River doesn't need anymore homes. It's all money money money, disgusting.</p> <p>Would affect the continuity of free access to Gorse Hill above this site.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>The only failing is that of the local government in not maintaining the Athletic Ground. Rather than losing such an asset, see the grounds improved and promoted as a continuing venue for sporting events at all levels.</p> <p>Support the proposal - Concerns voiced do not take into account the disruption caused by the significant increase in traffic and associated parking difficulties when the ground is in use, particularly for soccer matches.</p>		

100

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>The only plausible plan would be to cut a swathe through Kearsney abbey and decimate, destroy this wonderful recreational area. Increased traffic will damage my property as my house is not designed to cope with the vibration of large, increased and consistent traffic. The drainage in the River area will not be able to cope with any increase in housing on this scale as it cannot cope now. What plans are you putting in place to provide other spots facilities and recreational areas? 13. What plans for improved drainage? How much increase in council tax will you be charging to cover all the costs?</p> <p>Services & amenities in general would not cope in their current state and would need improvement.</p> <p>Why not demolish the awful derelict buildings, the County Hotel and those other ugly buildings along that section of Townwall Street and build nice housing there.</p> <p>River has no areas for people to walk their dogs.</p> <p>The development at Whitfield is sufficient for this area.</p>		
101		<p>It would be nice for all Dover that the work was completed on previous developments such as the Town centre and Buckland Mill site before you start on any future plans.</p> <p>You would be better off to give the football ground or sell it to them,so they can plan the clubs future ,and anydevelopment that might need.</p> <p>Would effectively create a vast urban sprawl.</p> <p>Petition signed by 66 residents.</p> <p>Buckland Hospital would have additional pressure due to increase in patient numbers 4. GP surgeries would have increased volume of residents.</p> <p>There one SSSI and a number of Local Wildlife Sites within or adjacent to Dover which are likely to be impacted as a result of development within Dover (KWT).</p>		
		<p>I am also not in favour of developing the Dover Athletic ground. I am not a sports fan, but think that the area should be kept for the people of Dover. I have been to many other events that use the field.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD18	Land at Crabble Football Ground Crabble Road River	<p>Total reps: 109</p> <p>Consider for residential redevelopment - would only come forward in the event of Dover Athletic Football Club vacating the site for more suitable premises elsewhere. This land and the proposed access are in Dover District Council ownership and is a medium to long term objective.</p> <p>Object to development because: used by residents; impact on residents life;</p> <p>Dover needs to retain as many green spaces and play areas as possible.</p> <p>It is a much needed source of entertainment something sadly lacking in the Dover area.</p> <p>There are plenty of 'brown field' sites or new areas outside of River that can be built upon.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, recreational interests and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Loss to the people of Dover and would ruin an area of outstanding natural beauty. Very popular for Dover residents. Development would have a devastating impact on our infrastructure and local facilities. 300 more cars, the village will come to a standstill. The impact on local schools, emergency services and other local services will be unreasonable. Any upheaval to be to the detriment of the Football Club. Gorse Hill is "Green Belt" land. River's identity as a village will also be lost as it will be engulfed by Dover.</p> <p>Object on grounds of both aesthetics and access. Number of unused properties in the district especially those in need of refurbishment.</p> <p>Most valuable recreational facility. Dover District has few sporting facilities. There are plans to develop sufficient housing elsewhere; b) insufficient additional places at River Primary School; c) shortage of 'green' space for high quality sporting use in the Dover environs.</p> <p>Important amenity to the area and very widely used.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Encourage healthier lifestyles - Crabble plays an important part in this.</p> <p>Fairly steep in this area making life extremely difficult during periods of bad weather.</p> <p>Take yet another playing field away from our youngsters. Fuelling the crime wave as more and more youngsters become disenfranchised. The rugby club premises are also an important venue with the community.</p> <p>Green-space buffer between Dover and the Parish of River.</p> <p>No jobs in Dover.</p> <p>Beautiful coniferous and deciduous trees around the sports grounds and of course on Gorse Hill which is a stunning piece of Dover</p>		
		<p>As the land is owned by the District Council the question of planning consent would be a foregone conclusion. Secure employment has been continually declining in both public and private industries.</p> <p>River doesn't need anymore homes. It's all money money money, disgusting.</p> <p>Would affect the continuity of free access to Gorse Hill above this site.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>The only failing is that of the local government in not maintaining the Athletic Ground. Rather than losing such an asset, see the grounds improved and promoted as a continuing venue for sporting events at all levels.</p> <p>Support the proposal - Concerns voiced do not take into account the disruption caused by the significant increase in traffic and associated parking difficulties when the ground is in use, particularly for soccer matches.</p>		

103

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>The only plausible plan would be to cut a swathe through Kearsney abbey and decimate, destroy this wonderful recreational area. Increased traffic will damage my property as my house is not designed to cope with the vibration of large, increased and consistent traffic. The drainage in the River area will not be able to cope with any increase in housing on this scale as it cannot cope now. What plans are you putting in place to provide other spots facilities and recreational areas? 13. What plans for improved drainage? How much increase in council tax will you be charging to cover all the costs?</p> <p>Services & amenities in general would not cope in their current state and would need improvement.</p> <p>Why not demolish the awful derelict buildings, the County Hotel and those other ugly buildings along that section of Townwall Street and build nice housing there.</p> <p>River has no areas for people to walk their dogs.</p> <p>The development at Whitfield is sufficient for this area.</p>		
		<p>It would be nice for all Dover that the work was completed on previous developements such as the Town centre and Buckland Mill site before you start on any future plans.</p> <p>You would be better off to give the football ground or sell it to them,so they can plan the clubs future ,and anydevelopment that might need.</p> <p>Would effectivly create a vast urban sprawl.</p> <p>Petition signed by 66 residents.</p> <p>Buckland Hospital would have additional pressure due to increase in patient numbers 4. GP surgeries would have increased volume of residents.</p> <p>There one SSSI and a number of Local Wildlife Sites within or adjacent to Dover which are likely to be impacted as a result of development within Dover (KWT).</p>		
		<p>I am also not in favour of developing the Dover Athletic ground. I am not a sports fan, but think that the area should be kept for the people of Dover. I have been to many other events that use the field.</p>		

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NS05DOV	Land at Crabble Lane, River	<p>Total reps: 53</p> <p>Consider for residential redevelopment - would only come forward in the event of Dover Athletic Football Club vacating the site for more suitable premises elsewhere. This land and the proposed access are in Dover District Council ownership and is a medium to long term objective.</p> <p>Object to development because: used by residents; impact on residents life;</p> <p>Dover needs to retain as many green spaces and play areas as possible.</p> <p>It is a much needed source of entertainment something sadly lacking in the Dover area.</p> <p>There are plenty of 'brown field' sites or new areas outside of River that can be built upon.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, biodiversity and recreational interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Loss to the people of Dover and would ruin an area of outstanding natural beauty. Very popular for Dover residents. Development would have a devastating impact on our infrastructure and local facilities. 300 more cars, the village will come to a standstill. The impact on local schools, emergency services and other local services will be unreasonable. Any upheaval to be to the detriment of the Football Club. Gorse Hill is "Green Belt" land. River's identity as a village will also be lost as it will be engulfed by Dover.</p> <p>Object on grounds of both aesthetics and access. Number of unused properties in the district especially those in need of refurbishment.</p> <p>Most valuable recreational facility. Dover District has few sporting facilities. There are plans to develop sufficient housing elsewhere; b) insufficient additional places at River Primary School; c) shortage of 'green' space for high quality sporting use in the Dover environs.</p> <p>Important amenity to the area and very widely used.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Encourage healthier lifestyles - Crabble plays an important part in this.</p> <p>Fairly steep in this area making life extremely difficult during periods of bad weather.</p> <p>Take yet another playing field away from our youngsters. Fuelling the crime wave as more and more youngsters become disenfranchised. The rugby club premises are also an important venue with the community.</p> <p>Green-space buffer between Dover and the Parish of River.</p> <p>No jobs in Dover.</p> <p>Beautiful coniferous and deciduous trees around the sports grounds and of course on Gorse Hill which is a stunning piece of Dover</p>		
		<p>As the land is owned by the District Council the question of planning consent would be a foregone conclusion. Secure employment has been continually declining in both public and private industries.</p> <p>River doesn't need anymore homes. It's all money money money, disgusting.</p> <p>Would affect the continuity of free access to Gorse Hill above this site.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>The only failing is that of the local government in not maintaining the Athletic Ground. Rather than losing such an asset, see the grounds improved and promoted as a continuing venue for sporting events at all levels.</p> <p>Support the proposal - Concerns voiced do not take into account the disruption caused by the significant increase in traffic and associated parking difficulties when the ground is in use, particularly for soccer matches.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>The only plausible plan would be to cut a swathe through Kearsney abbey and decimate, destroy this wonderful recreational area. Increased traffic will damage my property as my house is not designed to cope with the vibration of large, increased and consistent traffic. The drainage in the River area will not be able to cope with any increase in housing on this scale as it cannot cope now. What plans are you putting in place to provide other spots facilities and recreational areas? 13. What plans for improved drainage? How much increase in council tax will you be charging to cover all the costs?</p> <p>Services & amenities in general would not cope in their current state and would need improvement.</p> <p>Why not demolish the awful derelict buildings, the County Hotel and those other ugly buildings along that section of Townwall Street and build nice housing there.</p> <p>River has no areas for people to walk their dogs.</p> <p>The development at Whitfield is sufficient for this area.</p>		
		<p>It would be nice for all Dover that the work was completed on previous developments such as the Town centre and Buckland Mill site before you start on any future plans.</p> <p>You would be better off to give the football ground or sell it to them,so they can plan the clubs future ,and anydevelopment that might need.</p> <p>Would effectively create a vast urban sprawl.</p> <p>Petition signed by 66 residents.</p> <p>Buckland Hospital would have additional pressure due to increase in patient numbers 4. GP surgeries would have increased volume of residents.</p> <p>There one SSSI and a number of Local Wildlife Sites within or adjacent to Dover which are likely to be impacted as a result of development within Dover (KWT).</p>		
		<p>Petition received from River Women's Institute</p> <p>I am also not in favour of developing the Dover Athletic ground. I am not a sports fan, but think that the area should be kept for the people of Dover. I have been to many other events that use the field.</p> <p>The Trust would object to any development on this site as there would be a direct loss of habitat (KWT).</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL033	94 Crabble Hill	<p>Total reps: 3</p> <p>The loss of a valuable and important green space and its indigenous wildlife including pyramid orchids and its recreational benefits to local residents.</p> <p>The site has been previously evaluated and no further archaeological work is required at the site (KCC Planning).</p> <p>The Trust has no objection to development on these sites. There is a thick belt/copse of trees around SHLO33, this feature should be retained within the design (KWT).</p>	<p>Since these representations were made, a planning application has been granted, and implemented.</p>	<p>As planning permission has been implemented it is now no longer part of consideration for the Land Allocations Local Plan.</p>
LDF030	Buckland Paper Mill	<p>Total reps: 13</p> <p>Support policy text but seek some changes to wording to supporting text.</p> <p>CPRE support the proposed mixed-use redevelopment of the Buckland Paper Mill.</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Buckland Paper Mill. Insert: '(xi). the developer requisitions a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water'.</p> <p>As stated in policy SA8 paragraph vi, public access to river frontage is indeed welcome.</p> <p>We have no objection in principle of development at this location but the proposed policy SA 8 should be amended to state that development is subject to a satisfactory FRA.</p> <p>The Buckland Paper Mill site offers significant opportunity to restore the River Dour at the heart of the site. The Water Framework Directive, PPS9 and Biodiversity Action Plan priorities are all focused on restoring biodiversity where it is possible to do so. There must be a policy for the restoration of the river corridor through the development site as a green corridor for wildlife and people. This would involve ren</p> <p>This site has archaeological potential connected with the early use and settlement of</p>	<p>Since these representations were made, a planning application has been granted, and implemented.</p>	<p>As planning permission has been implemented it is now no longer part of consideration for the Land Allocations Local Plan.</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
General	Coombe Valley & Policy SA6	<p>Total reps: 63</p> <p>The proposals showed no regard for the unsuitability of Poulton Close for light industry.</p> <p>The area has a similar archaeological potential to to Buckland Hospital. We agree that a programme of archaeological works is likely to be required through a condition on any consent for this site.</p> <p>Support the upgrading of the Coombe Valley area. We would however, wish to urge that the opportunity be taken to create a soft and sympathetic town-country boundary here.</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Coombe Valley. Insert: '(v). the developer requisitions a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water'.</p>	<p>The site analysis forms for the Coombe Valley area demonstrates that in principle the are is suitable for redevelopment. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
		<p>No reference is made to the effect on the road network and any improvements which may be required. Any development of the two sites close to the Coombe Valley Railway Bridge will be difficult and could detrimentally affect the flow of vehicles close to the bridge.</p>		
LDF31	Land adjacent to Gas Holder, Coombe Valley Road	<p>Total reps: 9</p> <p>Support for the allocation for residential but the absence of a brief should not prevent the submission or determination of a planning application. The affordable housing requirement should be felxible to take account of development economics, and the costs associated with the remediation of contaminated land.</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
SAD19A	Buckland Hospital & Policy SA7	<p>Total reps: 11</p> <p>Can this site consist of entirely affordable, eco-homes. New hospital at the Barracks Site.</p> <p>We agree that a programme of archaeological works is likely to be required through a condition on any consent for this site.</p> <p>Hospital should be retained due to the demographics forecasted (older), the remotness of other hospitals and must ensure that adequate alternative healthcare provision can be delivered at a convenient location before allocating the Buckland Hospital site for development.</p> <p>Vehemently opposed - The Buckland site should not be developed before adequate healthcare services are in place.</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development subject to the relocation of the hospital. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Buckland Hospital. Insert: 'iv). the developer requisitions a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water'.</p> <p>No reference is made to the effect on the road network and any improvements which may be required. Access not reflected in the options table as an issue and is not included within the policy.</p>		
DOV44	Coombe Valley Road Car Park	<p>Total reps: 3</p> <p>Object to non-allocation of Coombe Valley Road car park site for residential development</p> <p>Objection to the omission of site because: the site performs extremely well in sustainability terms, providing a vacant urban site that is deliverable and achievable within the Plan period; would support existing proposed wider allocations at Coombe Valley without relocating employment; and there is a lack of significant constraints.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Would perform well in sustainability terms and would not displace any existing employment uses (KCC Property Group).</p> <p>No objection to development on this site (KWT).</p>	The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.	
NS16DOV	TA Centre, London Road	<p>Total reps: 2</p> <p>This terracing would have removed the archaeological potential of much of the site (KCC Planning)</p> <p>The Trust has no objection to development on these sites. Tree cover within NS16. All these features should be retained within the design. Full surveys should be undertaken before planning permission is granted.</p>	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.
NS06DOV	Land at Barwick Road & St. Radigund's Road, Dover	<p>Total reps: 3</p> <p>There is some limited potential for presently unknown archaeological remains to be present on the site (KCC Planning).</p> <p>Greenfield site and there can be no justification for building on additional greenfield sites given the huge allocation of sites for homes in Whitfield.</p> <p>These sites comprise areas which are part of St Radigunds LWS. The Trust would object to any development on this site as there would be a direct loss of habitat (KWT).</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, biodiversity and recreational interests.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS03DOV	Land to the east of former Co-Op Dairy, Holmstone Road, Coombe Valley	Total reps: 2 Adjacent to St Radigunds Valley LWS designated for its chalk grassland and ancient woodland. Likely to have an impact on the LWS due to recreational pressure. Would advise that an extensive buffer be placed around the LWS and additional alternative natural open space and Green Infrastructure be designed into the build to alleviate the recreational pressure on the LWS (KWT).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, biodiversity and recreational interests.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
LDF08	Factory Building, Lorne Road	Total reps: 3 CPRE support the proposed allocation. This allocation should be removed from the Site Allocations Document. The Environment Agency has objected to previous planning applications on this site. The site is extremely vulnerable to flooding and it is very unlikely that it can pass the Exception Test. This is probably the most vulnerable site within the town and should not be considered for residential use at all. This site is in an extremely sensitive location. As well as remains of post medieval industrial interest, the site is also very likely to contain the remains of the earliest recorded mill in the country. Any development proposals for this site would need to be accompanied by an archaeological assessment which should include a field	The site analysis form demonstrates that in principle the site is suitable for development. There are some complex issues regarding flood risk and a specific policy will be included. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.
LDF19	Cherry Tree Avenue	Total reps: 7 It is questionable this site will be deliverable due to contamination. The requirement for a programme of archaeological works is welcome. Support from CPRE, Dover Society.	The site is located within the functional flood plain, flood zone 3b and is not suitable for development.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
		We question the need for this site to be developed for residential use. It does not form part of the strategic allocations in the Core Strategy and is indicated as a site of high risk in the SFRA. If it is to stay insert: "The development boundary and proposed residential use is subject to the completion of a satisfactory FRA that demonstrates the development can be made safe and meets Part C of the Exception Test PPS25." This policy should also state that "the ecology of the River Dour corridor must be enhanced specifically that the cycle/pedestrian path must be set well back from the river's edge so that existing riparian habitat can be enhanced within the Environment Agency byelaw margin." Policy SA10, point ii. is more most welcome.		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL095	Stanhope Road,	Total reps: 7 Omission of site for housing development with enhanced public open space and potential for affordable housing, with the following reasons: the site is within the confines; has existing access; it will upgrade the open space provision; it is currently underused private open sapce; could incorporate affordable housing; not within AONB, flooding etc; development would improve biodiversity; and has potential to deliver approximately 75-125 units	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape, recreational interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
		The site was deemed unsatisfactory given that it would rely upon a single means of access and the steep gradient with the then high incidence of on-street parking which was observed at that time. Access to the site remains the same as in 1994 as does the steep gradient. On-street parking has increased significantly. Would cause unacceptable harm to the character and appearance of the surrounding area given its very prominent hillside location. What plans will be put in place to ensure that the wildlife (slow worms) is protected? Increasing the amount of properties on the street would increase the traffic using the street. Parking is at a premium as it is. Support - Would secure an area of open space for the benefit of existing and future residents. Future development would address the resident's concerns relating to traffic and parking with the ability to design a development appropriate to the site's context and topography.		
		Mature trees around the boundary with a copse in the NE corner and tree cover. All these features should be retained within the design. Full surveys should be undertaken (KWT). Support - Sites will be needed in the short and medium term which will help to sustain a high level of housing completions in the town (KCC Planning)		

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Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
LDF7	Eclipse Recovery Services and Sorting Office. Maison Dieu Road	<p>Total reps: 4 CPRE support the proposed allocation.</p> <p>There is no sewer capacity to accommodate the proposed development. The developer must requisition a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water.</p> <p>Surface water flooding is a concern at this location. As such, surface water flooding should be included as an issue in the allocations table.</p> <p>The site lies close to the line of the Dover to Richborough Roman road. Redevelopment of this site should include a requirement for a programme of archaeological works.</p>	<p>Since these representations were made, a planning application has been granted, and implemented.</p>	<p>As planning permission has been implemented it is now no longer part of consideration for the Land Allocations Local Plan.</p>
SHL001	Park Avenue (behind the Eclipse Recovery site and the former Post Office Sorting Office in Maison Dieu Road, Dover)	<p>Total reps: 5 Object to omission of this land. Suitable for residential because adjacent the sites are allocated, the allotments are private with no coverments, the site could be incorporated into the neighbouring developments and the site could be used to build dwellings for the elderly.</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Support - Potential for the development of a single two-storey block of 12 one-bedroom flats and provision for off-street parking. Addresses the already-identified indigenous growth of persons over the age of 65 living in the district. The steep hills make large numbers of properties virtually inaccessible to older people with increasing mobility issues.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the recreational interests (allotments) problematic access arrangements and potential overlooking issues.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Maison Dieu Road Nearby recorded flooding - classified as high risk in SFRA (Environment Agency).</p> <p>The Trust has no objection to development on this site (KWT).</p>		
LDF06	Charlton Green Sorting Office	<p>Total reps: 6 Section 2.112 mentions site boundaries may have to be moved because of flood risk. We are pleased to see this as a recommendation in SFRA. The Council should be aware that surface water flooding is a concern at this location.</p> <p>The requirement for an archaeological evaluation of this site due to the proximity of the Roman road is welcome.</p> <p>Support from the CPRE</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development. Insert: (iv) the developer requisitions a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water.</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		The site lies close to the line of the Dover to Richborough Roman road. Prehistoric, Roman and medieval finds have been recorded close to the site. Redevelopment of this site should include a requirement for a programme of archaeological works.		
SHL006	Charlton Shopping Centre, High Street	Total reps: 4 Charlton Shopping Centre should be identified for mixed use, including residential. Development with archaeological measures should be possible on this site (KCC Planning). Charlton Shopping Centre Nearby recorded flooding - classified as high risk in SFRA (Environment Agency). The Trust has no objection to development on this site (KWT).	Since these representations were made, the site has been sold and the intention is not to redevelop the site but to operate within the existing permitted use.	As the site will be operating within its permitted use, it is now no longer part of consideration for the Land Allocations Local Plan.
NS12DOV	Land to the north of Edred Road	Total reps: 1 Development with archaeological measures should be possible on this site. (KCC Planning)	The site analysis form demonstrates that the site is unsuitable for development. The representation made is only relevant if the site was considered to be suitable for development.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
NS07DOV	Land at Noah's Ark Road	Total reps: 2 There is some limited potential for presently unknown archaeological remains to be present on the site (KCC Planning). The Trust has no objection to development on this site (KWT).	The site analysis form demonstrates that the site is unsuitable for development. The representation made is only relevant if the site was considered to be suitable for development.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SAD21	Priory Road/Norman St. Car Park	Total reps: 4 Although neither large nor small car park have been identified by the 2007 Dover Parking Strategy, this is a medium term objective once sufficient capacity is provided elsewhere. A better use for the car parks would be to finish off the terraces of houses which adjoin both sites and provide the 46 spaces elsewhere. Dover needs more car parks to encourage visitors, shoppers and businesses. Any development proposals for this site should be accompanied by a detailed archaeological desk-based assessment and it is likely that field evaluation would be required to inform any planning decision (KCC Planning).	The site lies within the Urban Boundary and has a capacity of fewer than 5 units. If the site was to become available for development it would be assessed against the relevant policies in the Core Strategy.	

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
UCS4 & UCS19	Land adjacent to Dover Priory Station	<p>Total reps: 8</p> <p>Support but would question the estimated capacity of 90 units. Their client has undertaken an assessment, which suggests the site could accommodate approximately 125-140 dwellings. Suggest that the estimates should be treated as a guide and should be caveated as such.</p> <p>CPRE support the proposed allocation.</p> <p>There is no sewer capacity to accommodate the proposed development. The developer must requisition a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water.</p> <p>It is questionable this site will be deliverable due to contamination.</p>	<p>The site is not being considered for 90 residential dwellings. Sewerage, access arrangements, conservation and heritage issues, and contamination issues can be considered as part of any development proposal through the Development Management process.</p>	<p>The potential for a HS1 and town centre car park has been identified as an 'area of change' in the Land Allocation pre-submission Local Plan.</p>
		<p>The level of development referred to on this site could not be served by an access to the current standards as set down in Kent Design. It could not provide a second point of access or secure an emergency access unless third party land was included. It is poorly aligned with Folkestone Road and would require a Transport Assessment. There will be a requirement for off site highway works to provide an acceptable access. This is a difficult site in highway terms which has not been referred to in the Framework and the options table.</p> <p>Development would have to be sympathetic to the setting and amenity of the nearby Scheduled Monument of St Martin's Priory. Redevelopment of this site should include a requirement for a programme of industrial archaeological works.</p>		
NS09DOV	Land to the North of Malmains Road, Dover	<p>Total reps: 2</p> <p>Object to developments that result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to provide protection for the LWS</p> <p>Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Sites are either adjacent or within Little Farthingloe Woods and Grassland LWS, Great Farthingloe Downs LWS and Western heights LWS. We object to any of the smaller developments which result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to ensure protection of the habitats contained within the LWSs (KWT).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the biodiversity interest (LWS) and recreational interest (open access land). The other representation, relating to archaeology, is only relevant were the site considered to be suitable.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
DOV03M	Folkestone Road	<p>Total reps: 5</p> <p>We object to the non allocation of this land for residential. Council should allocate additional land for a further 789 dwellings to be reasonably sure that their objective of 10,000 new dwellings will be met by 2026.</p> <p>Should be included in the residential allocations as: does not include the allotment land to the east or the land that lies within the AONB; proper vehicular access can be provided; reasons for objection based on townscape should not be a consideration; a number of other sites have been suggested adjacent to the AONB; this is a smaller area where the previous objections to the larger site could be overcome; and there are no proposed sites to the west of the built up area of Dover.</p> <p>Object to developments that result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to provide protection for the LWS</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, biodiversity and recreational interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>This site would be more appropriate than Whitfield.</p> <p>Need to provide closer high quality housing nearer to the Dover Priory rail station with its easier access to Dover Town Centre.</p> <p>Views in the direction of Western Heights should not be compromised.</p> <p>This site gives easy access to the M20, would be good news for the town centre and local shops and it's on a good bus route. Would also reduce the need for the unwelcomed over expansion of Whitfield. Less impact on farmland.</p>		
SAD22	Folkestone Road	<p>Total reps: 7</p> <p>Suitable site for the development within SLA/AONB for 5-12 dwellings. Economic development to the west would have greater impact once developed.</p> <p>Object to developments that result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to provide protection for the LWS</p> <p>Development with archaeological measures should be possible on this site (KCC Planning).</p> <p>Support - site would be more appropriate than Whitfield.</p> <p>Support - easy access via the A20 to the M20, as well as being the easiest access to Dover Town Centre of any out of town location</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and biodiversity interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Support - easy access to the town centre as it is on a good bus route. Will reduce the need for the expansion of Whitfield.</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS10DOV DOV05E	Fathingloe Folkestone Road	<p>Total reps: 14</p> <p>This is more suitable for residential development than Whitfield. Fathingloe is adjacent to existing private dwellings, within reasonable walking distance from Dover centre and Dover Priority Station, serviced by bus routes and is near to the A20/M20 for hospital access.</p> <p>Site should be allocated for residential because it is a brownfield site adjacent to confines, it would reduce the scale at Whitfield, it has been unsuccessfully marketed for employment, it is an attractive location for executive housing.</p> <p>Object to developments that result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to provide protection for the LWS</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, historic environment, biodiversity and recreational interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
		<p>Support - There is an over-supply of employment land in Dover and the Employment Land Review suggests that there is a significant mismatch in the type of land available than that which is demanded. Residential redevelopment of the site has the potential to contribute to the much needed regeneration at Dover Town.</p> <p>The site lies within the internationally important fortifications of the Western Heights. A comprehensive and robust study assessing the significance of the monument, its character and setting will be required and this study should be used to inform any proposals being brought forward. Early consultation with English Heritage is recommended (KCC Planning).</p> <p>Support - The above sites will help Dover and certainly be more appropriate than Whitfield.</p> <p>Removal of an historic piece of land which gives so much to the local community.</p>	<p>Although a planning permission remains extant on part of the site, the remainder does not require policy protection in line with the recommendations in the Employment Update.</p>	
		<p>The loss of rural character of the landscape, increased goods vehicle movement in, to, and through the area. The historic nature of the site should in some way be linked to the Castle and efforts directed to make Dover renowned as a historical and leisure destination, emphasising its leisure appeal and not a retail/commuter destination (Guston Parish Council).</p>		

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Development could have a significant impact on the operation and/or safety of the trunk road network. Park and ride should also be mentioned in the SAD.</p> <p>Any development proposals for this site should be accompanied by a detailed archaeological desk-based assessment. Particular attention should be paid to the impact of the development on the setting of Great Farthingloe Farmhouse and the Western Heights (KCC Planning).</p> <p>Could have a significant impact on the operation and/or safety of the trunk road network and therefore the HA have advised the developers that we will expect a robust transport assessment and travel plan to be submitted and produced in accordance with relevant policy guidance. Particularly concerned about the Western Heights site where there is relatively poor road access direct to the town which may result in more local traffic using the Western Heights Roundabout and then the A20 rather than local routes. Aware that a Park and Ride site is proposed at Farthingloe, which may be worth noting within the Site Allocations document. (Highways Agency).</p>		
		<p>Support - The above site will help Dover and certainly be more appropriate than Whitfield.</p> <p>Would not object to mixed use development of the former Channel Site workmen's quarters, but consider the ribbon development beyond that as unacceptable.</p> <p>Support - Nearer to the Dover Priory rail station than all that is proposed for Whitfield. Easy access via the A20 to the M20, as well as being the easiest access to Dover Town Centre of any out of town location, these are prime areas for development.</p> <p>Development of this scale is not acceptable, when thousands upon thousand of new homes are already scheduled for development at Whitfield. Limited, sympathetic development would be acceptable provided that the proposed development at Whitfield was then reduced by the same amount.</p>		

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Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Object to the inclusion of the playing field land and any other outdoor sport facilities or ancillary buildings at these sites for development within the Site Allocations document. The Council is currently undertaking a Playing Pitch Strategy. Until this work is completed the Council should seek to protect any existing playing field sites from development, as these sites may be required now or in the future to meet the District's sport and recreation requirements (Sport England).</p> <p>Support - Folkestone Road has easy access to the M20 for Ashford, London and the Dover Docks. It has easy access to the town centre as it is on a good bus route. Most importantly it will reduce the need for the unwelcomed over expansion of Whitfield.</p> <p>Support - Development of this land at Maxton for housing and amenities would give a much needed boost to the regeneration of this desirable area of Dover. Its development, allied to its closeness to the town centre, will result in a much needed boost to retail and commercial trade.</p>		
SHL080	Elms Vale Road	<p>Total reps: 2 An area of scrub and trees within the urban confines which, if developed, would be in keeping with the surrounding residential properties provided it was built to similar densities.</p> <p>This site appears to be woodland. Although not ancient in origin it is likely to contain a valuable resource for local biodiversity. The Trust would recommend that part of the woodland be retained within the Green Infrastructure on site (KWT).</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape, and biodiversity interests.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
LDF24	St James's Townwall Street	<p>Total reps: 11 The intended level of pedestrian and cycle permeability within the area and whether they will have priority over vehicles should be made clearer. Policy SA1 (iii) should also mention bus links.</p> <p>Bench Street, fronting Townwall Street should now be included as part of a comprehensive solution to this part of south town. There is also a need to safeguard land for the proposed land bridge as referred to in the Core Strategy document.</p> <p>Site should be used for a hospital.</p> <p>This policy should be amended to include a requirement that any development should enhance the heritage and visitability impression of Dover to passing traffic.</p> <p>A new supermarket in the Burlington House area seems to be an unimaginative use of the land, where improved leisure facilities there might attract people from other areas.</p>	Since these representations were made, a planning application has been submitted. The representations do not raise any new issues and it is intended that the Saved Local Plan policy is rolled forward.	The site has full consent for a mixed use scheme comprising approximately 10,500sq m retail floorspace, granted in 2012, but work has not yet started. The Saved Local Plan policy will be rolled forward

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development in the St James area. Insert new text in policy.</p> <p>We would advise that a pre-determination evaluation be carried out in relation to archaeology.</p>		
SHL037	Albany Place Car Park	<p>Total reps: 5</p> <p>This site has been identified for closure in the Dover Parking Strategy 2007, allowing the 95 displaced long stay parking spaces to be accommodated within the proposed car park in mid-town. This would release this land for redevelopment without capacity problems in town centre parking stock.</p> <p>Dover needs more car parks, not fewer, in order to encourage visitors.</p> <p>This is a very sensitive site and buried archaeology and the setting of the Western Heights might limit what development could be achieved (KCC Planning).</p> <p>The Trust has no objection to development (KWT).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion. A specific policy will be included to ensure that part of the car parking is retained as part of any development proposals.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
NS11DOV	Western Heights	<p>Total reps: 10</p> <p>Consider Western Heights as a specific site allocation or as an 'Area of change'. Stress importance of linkages with Wellington Dock and wider development of visitor offer and the potential for a landmark development for hotel or leisure uses.</p> <p>Natural England has significant concerns -Much of this site lies within the Kent Downs AONB and Natural England would resist any extension to the urban area of Dover into the AONB. In addition, Western Heights is recognised as an important bat site and we recommend that further ecological information is obtained.</p> <p>Object to developments that result in direct land take from the LWSs and recommend that all sites abutting the LWSs provide an extensive buffer zone to provide protection for the LWS</p> <p>Development could have a significant impact on the operation and/or safety of the trunk road network. Access is also poor.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, historic environment, and biodiversity interests.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>A mixed use scheme in this area could have some merits if a sympathetic approach was taken.</p> <p>A comprehensive and robust study assessing the significance of the monument, its character and setting will be required and this study should be used to inform any proposals being brought forward. Early consultation with English Heritage is recommended (KCC Planning).</p> <p>Either of these two sites could have a significant impact on the operation and/or safety of the trunk road network and therefore the HA have advised the developers that we will expect a robust transport assessment and travel plan to be submitted and produced in accordance with relevant policy guidance. Particularly concerned about the Western Heights site which is located where there is relatively poor road access direct to the town which may result in more local traffic using the Western Heights Roundabout and then the A20 rather than local routes. We are also aware that a Park and Ride site is proposed at Farthingloe, which may be worth noting within the Site Allocations document. (Highways Agency).</p>		
		<p>Development which would adversely affect Scheduled Ancient Monuments and other nationally important archaeological sites and/or their settings will not be permitted. This must continue to apply to the Western Heights. Totally inappropriate for housing. It could do great harm to the setting of the scheduled Ancient Monument.</p> <p>Preserving the integrity and setting, including the skyline and slopes, of this Ancient Monument is paramount.</p> <p>The area contains scheduled ancient monuments; much of it is covered by chalk grassland which is a BAP habitat; it would be significant loss of open space which is used by people from all over Dover; the whole area is so characteristic of Dover and the North Downs that its loss is unthinkable. No mandate for the proposed changes.</p> <p>Loss of rural character of the landscape, increased goods vehicle movement in, to, and through the area, historic nature of the site should in some way be linked to the Castle and efforts directed to make Dover renowned as a historical and leisure destination (Guston Parish Council).</p>		
NS04DOV	Land at St Patrick's Road, Aycliffe	<p>Total reps: 2 No known archaeological potential on the site or part of it (KCC Planning).</p> <p>The Trust has no objection to development on this site (KWT).</p>	The site analysis form demonstrates that the site is unsuitable for development. The representations made do not alter this conclusion.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Deal Representations Summary Table

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	A number of sites in neighbouring Local Centres (Ash & Eastry), the Rural Service Centre of Sandwich and the District Centre of Deal have potential to impact on Worth. Planned local infrastructure provision is less than half required for the Adopted Core Strategy of 14,000 new homes in the district. If all the new homes already identified as required by the Medium Growth Strategy in the North of the district are developed, there is great concern that the A258 and local road network is not adequate to carry the anticipated increase in traffic without increasing danger to existing residents and road users. Further development to meet requirements of the High Growth Strategy demands major infrastructure improvements in the North of the District if it is to be sustainable (Worth Parish Council).	Kent Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	Noted
		<p>General issues raised included:</p> <ul style="list-style-type: none"> - Details on the current recreational pressure upon the aforementioned designated sites will be required; - threatening to destroy the particular identity of individual communities; - encroaching onto the countryside; - increased recreational pressure of 1600 new houses; - more important to focus on those issues that could not easily be overcome as part of any proposal, i.e. proximity to Listed Buildings or Conservation Areas; flood risk and SSSI; gridlock on roads; Deal town is reaching its limits for expansion. 	<p>The amount of residential development is set out in the Core Strategy which has been subject to public debate and was found to be sound by the Planning Inspector.</p> <p>Many of the issues raised, such as flood risk, impact on heritage assets and local facilities, are considerations in the site analysis forms. Many of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.</p> <p>Issues such as flood risk and access have been considered in the site evaluation process.</p>	Please see site specific responses to ascertain which sites are considered suitable or are not.
		It is imperative that all development is readily accessible by good quality and high frequency public transport services, to encourage travel by more sustainable modes and to reduce reliance on the private car;		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Redevelopment of brownfield sites can make a valuable contribution to the numbers of new dwellings required;</p> <ul style="list-style-type: none"> - avoid development in the flood risk area - need to look at the development in Northwall Road; - Deal Masterplan; 		
		<p>Positive issues raised:</p> <ul style="list-style-type: none"> - within the developments proposed there is an opportunity to improve the biodiversity value of the sites and establish a multifunctional network which will benefit the present and future population and provide valuable habitat for biodiversity - Sites should not be excluded due to tidal flood risk until the north Deal investigation has determined whether this risk can be mitigated together with risk to the existing built area of Deal and developer contributions used to fund the necessary infrastructure; 		
DEA33	Land off St Edmunds Road	<p>Total Reps: 11 (Inc. from organisations CPRE, KCC, Great Mongeham PC),</p> <p>Issues raised include;</p> <ul style="list-style-type: none"> - increase in light pollution; crime and traffic (Concerns road system unable to cope with the additional traffic); the loss of views with detrimental effect to existing properties; - Destruction of identity of village of Great Mongeham and destruction of the separation of the village to link to urban Deal (green wedge/buffer). - Extension would be into countryside. - Possible archaeological remains. 	<p>Whilst some of the issues raised (such as light pollution, loss of views and crime) are relevant to the principle of any development and could, in some cases, be mitigated, the site analysis form demonstrates that the site is unsuitable for development due to the impact on the Conservation Area and the loss of separation between the two settlements.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>

Deal

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
DEA26 & DEA13	Land at Minter's Yard	<p>Total Reps: 16 (Inc from organisations CPRE, St Margaret's Parish Council, Southern Water, KHS, KCC, Sport England) - Issues raised include: -road infrastructure is not suitable for increased traffic; very narrow; the roads leading to the site provide the only access for emergency vehicles, New access roads need to be provided, -Within a flood risk area; -Deteriorating the quality of life for the existing residents; traffic and noise; road safety; restrict hours to protect neighbouring residential amenity -Betteshanger is the appropriate site with the infrastructure ready to use but which lies idle, Needs to be well screened; - Where is the provision for specialist retail, high quality personal service, cultural growth?</p>	<p>Since these representations were made, a planning application has been granted and implemented. Many of the issues raised were considered and assessed at the Planning Application stage.</p>	<p>As the site has been granted planning and has been implemented, it is now no longer part of the consideration for the Land Allocations Local Plan.</p>
		<p>Local environmental issues as a result of the additional; green travel plans & independent traffic assessment required; - current employment sites should be reviewed against an independent assessment of demand to identify viable and strategic employment sites; commercial demand; - insufficient consideration of Deal's skills base or employment needs; - archaeological potential; - promote healthier lifestyles and improve accessibility to facilities.5:5</p>		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
DEA06E	Albert Road	<p>Total Reps: 10 (Inc from organisations CPRE, St Margaret's Parish Council, Southern Water, KCC, Sport England) - Issues raised included;</p> <ul style="list-style-type: none"> - Extend further to the boundary with Minters Yard & seek enlargement of the site; mixed use, including residential which would be a 'good neighbour'; performs well in sustainability terms; help with the regeneration in North Deal; - Ensure access across this site is available by an adopted road to the rear of Minters Yard and beyond; - important to be well screened; - no longer suitable; - Where is the provision for specialist retail, high quality personal service, cultural growth? - Lack of provision for improved access arrangements; very limited road network; TIA for Minter's Yard; green travel plans, promote healthier lifestyles and improve accessibility to facilities - current employment sites should be reviewed against an independent assessment of demand to identify viable and strategic employment sites; insufficient consideration of Deal's skills base or employment needs; - provision for archaeological evaluation and mitigation measures; 	<p>The Council's intention is to pursue this area in a focused study of the Albert Road area. The 2002 Local Plan policy will continue to be 'saved' until the outcome of that study.</p>	<p>Continue to save the 2002 local plan policy for employment.</p>

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD06	Land at Marlborough Road	<p>Total Reps: 6 (Inc from organisations Southern Water, KCC, KHS, Sport England) - Issues raised include:</p> <ul style="list-style-type: none"> - Important to be well screened; - where is the provision for specialist retail, high quality personal service, cultural growth? - Concerns regarding access; green travel plans, promote healthier lifestyles and improve accessibility to facilities - inadequate consideration given to Deal's local skills and employment needs; small start up units; current employment sites should be reviewed against an independent assessment of demand to identify viable and strategic employment sites; no mention is made of provision of smaller scale retail, professional services or cultural development; - archaeological potential; 	The Employment Update has indicated that this site is no longer required for employment.	The site is no longer required to meet the employment allocation and should not be allocated in the pre-submission local plan.
SHL076	Land between St Richard's Road and Ellen's Road	<p>Total Reps: 18 (Inc organisations Deal & Walmer Chamber of Trade, Deal Society, Walmer Parish Council, Deal Town Council, Highways Agency, KCC) - Issues raised include concerns of:</p> <ul style="list-style-type: none"> - loss of outstanding views; Visual impact and grade of agricultural land. - close to areas of international ecological importance, - significant recreational pressures from additional residents, will not result in an acceptable mitigation of these impacts, - lack of consistency with National Guidance in PPS9, - water related issues; expectations of sea level rises, low-lying and at risk of flooding, - any increase in traffic flows may have a detrimental impact on the A2 trunk road, need to address the Deal/Dover commuting issue in order to secure the satisfactory operation of the A2 around the edge of the town. Traffic on the A258 is already very heavy and this development will only increase the traffic levels, single track lanes; - no primary schools; 	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider road network and on the wider landscape. Many of the issues raised through consultation are not site specific and relate to the general principle of additional development in Deal and could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>The railway overbridge at Station Road is narrow and has a signed height restriction; poor access, railway bridge forms a bottle neck; high traffic volumes;</p> <ul style="list-style-type: none"> - major impact to all infrastructure; difficulties in getting rid of waste water due to low lying land - extremely high level of archaeological sensitivity <p>Comments of support included;</p> <ul style="list-style-type: none"> - less landscape impact, - access to alternative modes of transport other than the car, and is within walking distance of local amenities; access problems could be overcome by widening the rail bridge or by traffic management; mixed use development; - New development here would create a far softer edge to the urban area south of Deal. 		
		<p>Other comments:</p> <ul style="list-style-type: none"> - It is imperative that all development is readily accessible by good quality and high frequency public transport services, to encourage travel by more sustainable modes and to reduce reliance on the private car. 		
SAD31	133-147 St Richard's Road	<p>Total Reps: 1</p> <p>An additional 0.75ha behind 133-147 St Richard's Road should also be allocated for residential development and is well related to local facilities.</p>	<p>The site analysis form demonstrates that, in principle, the site is suitable for residential development.</p>	<p>The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.</p>
PP003	Timber Yard, Mill Hill	<p>Total Reps: 5 (Inc from organisations CPRE, Southern Water, KCC) -</p> <p>Issues raised include:</p> <ul style="list-style-type: none"> - Only One access; - rich archaeological background 	<p>Since the publication of the Preferred Options Document, part of the site has been developed.</p>	<p>As the site has been granted planning and has been implemented, it is now no longer part of the consideration for the Land Allocations Local Plan.</p>

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL072	Ray's Bottom, Walmer	<p>Total Reps: 24 (Inc organisations Deal Society, Walmer Parish Council, Deal Town Council, Highways Agency, KCC) - Issues raised include:</p> <ul style="list-style-type: none"> - Risk of flooding; Current drainage system quickly overflows in severe weather; impact on run off water that proposed development would have on adjacent properties; tidal flooding; road is already subject to flooding by storm water; - narrow road; the access is very poor; the road structure and general slope of the land would preclude a normal housing development; additional traffic on a single track; no pavements; majority of traffic would need to access the A258 to Dover; busy junctions; detrimental impact on the A2 trunk road, need to address the Deal/Dover commuting issue in order to secure the satisfactory operation of the A2 around the edge of the town. - It is imperative that all development is readily accessible by good quality and high frequency public transport services, to encourage travel by more sustainable modes and to reduce reliance on the private car - close to SSSI; 	<p>The site analysis form demonstrates that, in principle, the site is not suitable for residential development due to the possible traffic impacts on the wider road network.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
		<ul style="list-style-type: none"> - considerable slope on the site; - would add further demands on an already stretched services infrastructure (drainage, water and power supplies), old and under capacity system further down stream; - unacceptable infilling of the south of Walmer, will eventually join Walmer and Kingsdown; density should be low; access is very poor; wildlife habitat; - scale out of keeping; - unofficial nature conservancy area; creatures are under threat; - loss of visual amenity; - contrary to WDS5 of the Walmer Design Statement; air pollution; - no jobs in this area; require car ownership; - site extremely elevated. 		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL039	Land at the western end of Hawkshill Road, Walmer	Total Reps: 13 (Inc organisations Deal Society, Walmer Parish Council, Deal Town Council, KCC) - Issues raised include: - Common "freedown" land; - access is via an unadopted road, not substantial enough to serve further dwellings because of its substructure; - increase the traffic using local roads; - unacceptable infilling of the south of Walmer which will eventually join Walmer and Kingsdown; - proposal density is out of character with the adjacent area; - impact on area of outstanding natural beauty; too environmentally sensitive; adjacent to the Hawkshill Common section of Local Wildlife Site (is a SNCI) DO01; - development with archaeological measures may be possible on this site.	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape and historic park and is in a location divorced from the main town. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
DEA29 & DEA30	126 Mongeham Road	Total Reps: 8 (Inc from organisations Great Mongeham Design Statement Group, CPRE, Great Mongeham Parish Council, Southern Water, KCC) - Issues raised: - Area could not cope with both sites developed; - poor access; - archaeological remains; - adjacent conservation area.	The site analysis form demonstrates that the site is suitable for development. Some of the issues raised through consultation are not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL023	Land at Dover Road, Walmer	<p>Total Reps: 12 (Inc organisations Deal Society, Walmer Parish Council, Deal Town Council, Highways Agency) positive issues raised include;</p> <ul style="list-style-type: none"> - well located; landscape buffer; less prominent and less constrained; would create a far softer edge to the urban area south of Deal - expectations of sea level rises, other sites are low-lying and at risk of flooding; <p>Negative comments include:</p> <ul style="list-style-type: none"> - close to areas of international ecological importance; - significant recreational pressures from additional residents; green infrastructure network will not result in an acceptable mitigation of these impacts; - lack of consistency with National Guidance in PPS9; - important water related issues; - significant impact on the A2 trunk road; need to address the Deal/Dover commuting issue in order to secure the satisfactory operation of the A2 around the edge of the town; another junction onto the busy A258; road over capacity; cause congestion; access would be on to the narrowest point of Dover Road; 	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
		<p>it is imperative that all development is readily accessible by good quality and high frequency public transport services, to encourage travel by more sustainable modes and to reduce reliance on the private car;</p> <ul style="list-style-type: none"> - extends the urban area of Walmer into the countryside; - detrimental impact on landscape and poor access; - contravene Policies DM1 and DM12 of the Core Strategy; - development of site should be avoided. 		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SAD05	Hall on the corner of Mill Hill and Freeman's Way	Total Reps: 2 (Inc from organisations KCC) - Issues including Archaeology & Scale.	This site has been subject to a planning application which has been granted by the District Council. The site is considered to be too small to be allocated.	The site is too small and there is a planning permission. It is not necessary to allocate this site.
SHL052	Land at Golf Road	Total Reps: 11 (Inc organisations Deal & Walmer Chamber of Trade, Deal Society, Worth Parish Council, Deal Town Council, KCC, Environment Agency) - Issues raised include: - Flood risk; in or adjacent to the Flood Plain; EA tidal inundation flood risk zone - close to a Ramsar Site and a SSSI; - intrusion into this preserved countryside; - inadequate capacity within the local foul sewerage network thus will require Southern Water to carry out improvement works; - Unacceptable increase in cars along Golf Road; highway access; - development with archaeological measures may be possible on this site; - demands major infrastructure improvements in the North of the District if it is to be sustainable.	The site analysis form demonstrates that the site is unsuitable for development due to being located within Flood Zone 3. Alternative site should be considered. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
SHL049 & SHL090	Land adj to Minter's Yard	Total Reps: 11 - SHL049 (Inc organisations Deal & Walmer Chamber of Trade, Deal Society, Worth Parish Council, Deal Town Council, KCC) - Issues raised include: - major issues of road infrastructure in this area and it lies within the flood plain; - should be allocated for non-residential land uses; - close to a Ramsar Site and a SSSI; - intrusion into this preserved countryside; - inadequate capacity within the local foul sewerage network thus all will require Southern Water to carry out improvement works; - DDC should invest in adequate infrastructure in respect of roads and sewers; - development with archaeological measures may be possible on this site;	The site analysis form demonstrates that the site is unsuitable for development due to poor access and its location within Flood Zone 3. Alternatives sites in less vulnerable locations should be considered. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated. The Council's intention is to pursue this area in a focused study of the Albert Road area.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Total Reps: 11 - SHL090 (Inc organisations Deal & Walmer Chamber of Trade, Deal Society, Worth Parish Council, Deal Town Council, KCC, Environment Agency) Issues raised include:</p> <ul style="list-style-type: none"> - Should be considered for use for lower risk uses such as community, leisure or open space; - demands major infrastructure improvements in the North of the District if it is to be sustainable; - in or adjacent to the Flood Plain; - close to a Ramsar Site and a SSSI; - intrusion into this preserved countryside; - inadequate capacity within the local foul sewerage network thus all will require Southern Water to carry out improvement works; - DDC should invest in adequate infrastructure in respect of roads and sewers; - the site acts as a green buffer Zone; must remain green lung; - demands major infrastructure improvements in the North of the District if it is to be sustainable. 	<p>The site analysis form demonstrates that the site is unsuitable for residential development due its location within Flood Zone 3. Alternatives sites in less vulnerable locations should be considered first. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.</p> <p>The Council's intention is to pursue this area in a focused study of the Albert Road area.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
SAD04	Oak Street Car Park	<p>Total Reps: 1 Object to the omission in the Site Allocations Document of the Oak Street Car Park, Deal. This site has been identified for closure in the Deal Parking Strategy 2007, allowing the 15 displaced parking spaces to be accommodated within the Union Street car park, and would benefit from sympathetic redevelopment.</p>	<p>The site analysis form demonstrates that the site is not suitable for development due to flood risk and the site is too small. Alternatives sites in less vulnerable locations should be considered.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
DEA23	South Barracks	<p>Total Reps: 4 (inc organisations The Deal Society, KCC) Issues raised include:</p> <ul style="list-style-type: none"> - increase the traffic levels; - development with archaeological measures may be possible on this site. 	<p>The site has planning permission and is currently under construction.</p>	<p>As the site has been granted planning and has been implemented, it is now no longer part of the consideration for the Land Allocations Local Plan. Remaining Employment to be allocated?</p>

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
SHL087	Land to the rear of West Lea	Total Reps: 10 (Inc organisations Deal & Walmer Chamber of Trade, Deal Society, Worth Parish Council, Deal Town Council, KCC, Environment Agency) - Issues raised include: - in or adjacent to the Flood Plain; - close to a Ramsar Site and a SSSI; - intrusion into this preserved countryside; - inadequate capacity within the local foul sewerage network thus all will require Southern Water to carry out improvement works; - DDC should invest in adequate infrastructure in respect of roads and sewers; in the EA tidal inundation flood risk zone; - unacceptable increase of cars; - badly congested roads; - Archaeology: Scale 3; - demands major infrastructure improvements in the North of the District if it is to be sustainable.	The site analysis form demonstrates that the site is unsuitable for residential development due to being located within Flood Zone 3. Alternative sites should be considered. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NS01DEA	Former South Deal County Primary School	Total Reps: 3 (Inc from organisations - The Deal Society, Deal Town Council, KCC) - Historic maps show that the site largely lies within a former Brickearth quarry;	The site analysis form demonstrates that the site is suitable for development. Many of the issues raised through consultation are not site specific and relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be suitable and should be included within the pre-submission local plan.
NS02DEA	Land at Courtmarsh Farm and Park Avenue Motors, Albert Road	Total Reps: 9 (Inc from organisations - Deal & Walmer Chamber of Trade, The Deal Society, Environment Agency, KCC, Worth Parish Council) - Issues raised include: - Flooding; - Archaeology: Scale 3; - demands major infrastructure improvements in the North of the District if it is to be sustainable; access; l - loss of potential and existing employment land;	The site analysis form demonstrates that the site is unsuitable for residential development due to being located within Flood Zone 3. Alternative sites should be considered. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated. The Council's intention is to pursue this area in a focused study of the Albert Road area.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS03DEA	Redundant Factory Site, Ark Lane	Total Reps: 6 (Inc from organisations - The Deal Society, Deal Town Council, Environment Agency, KCC, Worth Parish Council) - Issues raised include: - number of dwellings suggested is excessive; - stress on the road network in this area; - flooding; - unsuitable for large vehicles or a significant increase in traffic flows; - footways are substandard.	The site analysis form demonstrates that the site is unsuitable for residential development due to being located within Flood Zone 3. Alternative sites should be considered first. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NS04DEA	Redhouse Wall	Total Reps: 8 (Inc from organisations - The Deal Society, Deal Town Council, Environment Agency, KCC, Kent Wildlife Trust, Natural England) - Issues raised include: - visual impact from Fowlmead Park; - short term leisure provision; - low-lying, flood plain; poorly defended and has flooded in the past; Rapid Inundation Zone; - further increase in cars down the Ancient Highway; - joining Deal to Sandwich; - planning history; - Protection of the Natura 2000 and Ramsar Network; Sandwich Bay to Hacklinge Marshes SSSI; Thanet Coast and Sandwich Bay SPA; Ramsar sites; no development within the European sites; increase recreational pressure on the SPA; bird disturbance; damage the habitat for which the Ramsar is designated.	The site analysis form demonstrates that the site is unsuitable for caravan/leisure park due to being located within Flood Zone 3, European Designations and has a poor road network leading to the site.	The site is considered to be unsuitable for caravan/leisure park and should not be allocated in the pre-submission local plan.
NS05DEA	Land at St Richard's Road	Total Reps: 3 (Inc from organisations - The Deal Society, KCC, Sport England) Issues raised include: - objects to the inclusion of the playing field land and any other outdoor sport facilities or ancillary buildings for development within the Land Allocations Document for residential development; - the Council should seek to protect any existing playing field sites from development; - the site is located on the Mill Hill ridge, an area that is exceptionally rich in archaeological remains.	The site analysis form demonstrates that the site is unsuitable for residential development due to loss of formal open space and GI. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
NS06DEA	Land at Cowdray Square	Total Reps: 3 (Inc from organisations - The Deal Society, KCC, Sport England) Issues raised include: - objects to the inclusion of the playing field land and any other outdoor sport facilities or ancillary buildings for development within the Land Allocations Document; - the Council should seek to protect any existing playing field sites from development ; - extremely high level of archaeological sensitivity	The site analysis form demonstrates that the site is unsuitable for residential development due to loss of formal open space and GI. Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NS07DEA	Land between Albert Road and Southwall Road	Total Reps: 14 (Inc from organisations - Deal & Walmer Chamber of Trade, The Deal Society, Deal Town Council, Environment Agency, KCC, Highways Agency, Worth Parish Council) Issues raised included: - flood risk; - inadequate provision of schools, doctor surgeries, dentists; - over development; - The new Community Centre and Doctor's surgery will not be adequate; - chronic social problems existing in North Deal now; - adequate recreational facilities for all age groups - more are needed already; - Road safety? carbon pollution levels legal? Noise?; this would be a massive impact on the local community, - highways access and major impact to infrastructure;	The site analysis form demonstrates that the site is unsuitable for residential development due to flood risk but could be suitable for employment . Some of the issues raised through consultation are, however, not site specific and could relate to the general principle of additional development in Deal, which could be mitigated. The Council's intention is to pursue this area in a focused study of the Albert Road area.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
		Comments in support: - it is submitted that the mixed use development as proposed would contribute to the growth strategy for Deal and the District as a whole ; retaining and enhancing employment opportunities; providing new housing; additional community facilities; opportunities for the provision of open space and sport and recreation facilities; contribute to the Green Infrastructure Network; improving accessibility to the locality; within Flood Zone 2. - Development with archaeological measures may be possible on this site.		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
PHS010	Land North West of Sholden	<p>Objections:</p> <ol style="list-style-type: none"> 1) Land marks the distinct entry into Deal. 2) It should remain as arable farmland. 3) Proportion of homes allocated for housing association is too large. 4) There are no supporting services. 5) Increase in crime. 6) Closure of hospitals and cut back of facilities in our area. 	<p>This site has been identified as an urban expansion area in the adopted Core Strategy and has been subject to a planning application which the District Council has resolved to grant planning permission. The issues raised, particularly in relation to roads, landscape impact and designated nature conservation areas, have been considered as part of that process.</p>	<p>This site is considered to be suitable for residential development and should be allocated in the Submission Document.</p>
		<p>Comments:</p> <ol style="list-style-type: none"> 1) Any development would have to retain the mature trees around the boundary line and the need to present a 'soft edge'. 2) It could be developed with due regard to the landscape and character of the area. 3) Suitable access and road improvements would also need to be considered before any development could take place. 		
		<p>Objections:</p> <ol style="list-style-type: none"> 1) This development would only add to the problems of the A258 and Deal's restricted roads. 2) These sites are both on Grade I Agricultural Land. 3) Development will increase urban sprawl and be detrimental to the setting of Sholden and the wider landscape. 4) These sites fall between two Sites of Special Scientific Interest (SSSI) and the World Convention of Wetlands (RAMSAR). 5) The impact of development on the wildlife and their habitats in the area is of great concern. 6) Architectural and historic interest of listed buildings and their setting should be properly safeguarded. Despite this there is no mention of the several listed buildings within Hull Place. 7) Strategic Flood Risk Assessment has confirmed that northern parts of Deal and the countryside to the North are within a high flood area. 8) Strongly object to any further development and the proposed building of more houses in the area. 	<p>This site has been identified as an urban expansion area in the adopted Core Strategy and has been subject to a planning application which the District Council has resolved to grant planning permission. The issues raised, particularly in relation to roads, landscape impact and designated nature conservation areas, have been considered as part of that process.</p>	<p>This site is considered to be suitable for residential development and should be allocated in the Submission Document.</p>

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>9) Deal has at present only two principal routes in/out of the town. Opportunities to add another route, for geographical reasons, not to mention expense, are almost certainly out of the question, and at peak travel times are at, or in excess of, capacity.</p> <p>10) It would prove almost impossible to increase the capacity of these two trunk routes without demolition of existing dwellings, which would seem to negate the whole point of the exercise.</p> <p>11) Any move to connect the proposed new development with the centre of Deal via a link road would also be ill starred as any chosen route would intersect at some point with London Rd.</p> <p>12) Consideration needs to be given to how much more peripheral development Deal can take considering the shape of the town, its seafront location and the restricted size of its Central Business District and the old town streets.</p> <p>13) Lack employment opportunities in the area.</p> <p>14) As Deal has recently undergone a round of school closures, there can surely be no business case for a new school whatsoever.</p>		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>14) Development of this land should not be permitted until other more acceptable, greenfield sites, or at least the one the other side of Sholden, have been substantially completed.</p> <p>15) Extra strain on an already poor infrastructure, ie water and electricity.</p> <p>16) Condition ii) should be more specific.</p> <p>17) The poplars along the Sandwich Road provide a unique entry to Deal and they should not be removed for any reason least of all access to the site.</p> <p>18) Building houses 2 miles away from the centre of Deal is an unacceptable distance for older people to travel on a regular basis.</p> <p>19) The infrequent bus service is impractical.</p> <p>20) Brownfield sites in and around town should be developed first and thereby improve the look of the town.</p> <p>21) Please improve community facilities before embarking on any expansion projects.</p> <p>22) Existing houses for sale take ages to actually sell.</p> <p>3) The village of Sholden should not be included as part of Urban Deal under the proposed Settlement Hierarchy. Such classification will erode Sholden's feeling of separate identity and community, and could lead to over development.</p>		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>24) 900 homes can be built in Deal on brown field sites and that should be accepted as a maximum.</p> <p>25) Deal hospital has been downgraded to minor injuries and the police station is rarely open.</p> <p>26) The village only has a five-inch sewer pipe carrying waste and drainage. 27) Population is expected to fall.</p> <p>28) Present economic climate the government estimates that 150,000 mortgage repossessions. 29) Postcodes in Sholden are liable to subsidence.</p> <p>30) The Street has no footpaths and is very narrow. 31) An already high level of out commuting from Sholden/ Deal.</p> <p>32) No reference to the Government's Transport Emissions policy is committed to reducing emissions by 40% by 2050.</p> <p>33) No local shops, closure of the local post office. 34) There is already parking congestion in this area.</p> <p>35) Children will have no where to play.</p> <p>36) Tourism: there is a danger that continued development of Deal and Walmer will erode their unique character, thus damaging their appeal as a tourist destination.</p> <p>37) This area has suffered from hosepipe bans, and at times there have been genuine worries about drinking water supplies.</p>		
		<p>38) The resources in Deal i.e. Dentist, doctors etc. are stretched already.</p>		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Comments:</p> <p>1) Government policy requires the use of local grown produce to reduce the carbon footprint of imported produce.</p> <p>2) If Sholden school were still required with the expected reduction in school age children, it should be moved to the site where its playing fields would help the fading into the countryside effect aspired to.</p> <p>3) "any landscaping throughout the site should improve biodiversity". Replace word "should" with "must" which will ensure that it actually happens.</p> <p>4) "Existing trees are retained with a 20m safeguarding boundary provided, unless removal is essential for access". No way, all the trees should retained and the access changed to go around the trees. 5) There are a great many unsold houses for sale in the Deal area. 6) Managing traffic by creating safe cycle and walking routes and a much more flexible bus services.</p>		
		Support: 1) The town needs development in order to save the High Street.		
PHS009	Land between Deal and Sholden	<p>Objection: 1) Good walking country for residents and those that like visiting the town of Deal. Building on this and it will be a another nail in the coffin for the tourist industry.</p>	<p>There is only one short public right of way and this is only affected by the proposed development where it is already adjacent to the urban form. This has been incorporated into the planning application.</p>	No amendment considered necessary.
		<p>Objections: 1) The road infrastructure for this area is totally unsuitable for the houses being proposed.</p> <p>2) The propped access points are too narrow and too few.</p> <p>3) The area is a flood risk and some houses in area currently cannot obtain insurance.</p> <p>4) The farm land is Grade 1 Agriculture and should remain as so.</p> <p>5) The area is very close to a SSSI.</p> <p>6) Less open land but planted with trees, leaving a green wedge.</p>	<p>The concerns raised have been considered as part of the planning application and it was considered that development was possible through that process. Flood risk, infrastructure and nature conservation issues will be raised in the supporting text to the policy.</p>	Supporting text to be amended to include reference to these issues.

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Objections: 1) Loss of employment of workers on the rhubarb fields.</p> <p>2) Building on 5m contour, flood plans.</p> <p>3) No proof for additional housing needed.</p> <p>4) Few employment opportunities.</p> <p>5) Poor road network and highway system.</p> <p>6) Should not be fully developed until alternate road access provided.</p> <p>7) The three planned roads are very narrow and not suitable for the amount of traffic the development would bring.</p> <p>8) The local emergency services are being downgraded and more houses would place to extra pressure on these.</p> <p>9) The highway network of the area is totally unsuitable.</p> <p>10) The area is largely Grade 1 agricultural/Greenfield land.</p> <p>11) The area is very close to a SSSI.</p> <p>12) The proposed developments for Sholden would increase the size/population of the area by an unrealistically high amount.</p> <p>13) The infrastructure of the area (health facilities/education/employment/ shopping etc) could not cope with such a large increase.</p>	<p>This site has been identified as an urban expansion area in the adopted Core Strategy and has been subject to a planning application, which the District Council has resolved to grant planning permission. The issues raised, particularly in relation to roads, landscape impact and designated nature conservation areas, have been considered as part of that process. The policy will address some of these issues. Other issues, such as infrastructure, will be a requirement of other policies in the Core Strategy.</p>	<p>This site is considered to be suitable for residential development and should be allocated in the Submission Document.</p>

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>14) The increase of traffic from some 300 homes onto Church Lane would be potentially worse than, and certainly exacerbate the suggested traffic from, the Minter's Yard industrial developments that are currently at appeal.</p> <p>15) Building houses 2 miles away from the centre of Deal is an unacceptable distance for older people to travel on a regular basis.</p> <p>16) The infrequent bus service is impractical.</p> <p>17) Issues such as water supply/demand, sewage capacity and carbon emissions from both homes and vehicles are all relevant.</p> <p>18) Provide better community facilities before embarking on any expansion projects.</p> <p>19) The Green Wedge - The current wording is weak as it does not specifically require the developer to do this.</p> <p>20) Without ownership, there is no guarantee against piecemeal development.</p> <p>21) Access Road - A new access route should be considered onto London Road to reduce traffic flow around Upper Deal.</p> <p>22) Housing on its own will not serve to regenerate the area-jobs must come first.</p> <p>23) How will all these households be served by community services- education, health services, recreation, and services for the elderly?</p>		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>24) Currently residents are finding it difficult or impossible to obtain house insurance.</p> <p>25) According to the District Council's commissioned Strategic Flood Risk Assessment forming part of the evidence, only 18% of the site is within zone 3a (with a further 10% in zone 2), this is at the eastern end where the housing development is proposed rather than at the western end which is the open space. It would wiser to reverse these so that it is the housing development area rather than the open space that is least at risk.</p> <p>26) The site is surrounded on 3 sides by land which is within zones 2 and 3a of the Environment Agency's flood risk assessment, increasing the risk that if the flood zones expand the site could be even more vulnerable.</p> <p>27) Sholden is a village, the proposed extra housing will render it a mere suburb of Deal.</p> <p>28) The village of Sholden should not be included as part of Urban Deal under the proposed Settlement Hierarchy.</p> <p>29) 900 homes can be built in Deal on brown field sites and that should be accepted as a maximum.</p>		

Deal

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>30) The infrastructure around Deal and Sholden is unable to cope with the need for more traffic, Dental Services, G.P. Services, Police and Fire Services.</p> <p>31) The village only has a five-inch sewer pipe carrying waste and drainage.</p> <p>32) Employment: there has only been one enquiry for the Betteshanger industrial site.</p> <p>33) Increased population will lead to crime, vandalism and unsocial behaviour.</p> <p>34) Developers have said that scrubland between new houses and Sholden Church would be developed into parkland. Concern expressed about this area being taken over by gangs of teenagers.</p> <p>35) There is an inconsistency with the Sustainability Appraisal and the Site Allocations Documents which states that "alternative sites outside the flood risk will need to be considered first" and other policy documents such as the DDC Strategic Flood Risk Assessment and "The Vision of Kent".</p> <p>36) The location of the community facilities are in an inappropriate location in the highest flood risk area.</p> <p>37) Impact of the proposed floodlit multi-games area/community leisure on residential amenity.</p> <p>38) Population is expected to fall.</p>		

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Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>39) Access to A258 from The Street is very difficult.</p> <p>40) Detrimental to the quality of life and environment.</p> <p>41) Present economic climate the government estimates that 150,000 mortgage repossessions. 42) No need for this amount of housing as do not have the population to fill them.</p> <p>43) Quality of life will be severely affected by increased in noise, pollution and safety issues.</p> <p>44) The Court Lodge Farm site is situated on the flood plain, which up until March each year a 1/4 of the land is flooded, the water comes up out of the ground, early morning the water is shallow and as the day goes on the water rises.</p> <p>45) With house prices dropping, possibly as much as a 1/3 houses already for sale will become cheaper and becoming more affordable. Therefore there should be no need for these new houses to be built.</p> <p>46) CPRE have previously objected to a planning application to develop this site largely on the grounds that an existing green wedge would have been lost, and the District Council refused planning permission.</p> <p>47) The threat of destroying the identity of Sholden.</p>		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>48) Everything about these plans affecting Sholden will simply exacerbate difficulties already existing-more out-commuting, increased transport problems, physical and social structure.</p> <p>49) The overprovision of housing in areas of lower employment opportunities, and lower levels of pay, could well have the contrary effect to that envisaged.</p> <p>50) Traffic issues - the current roads (Orchard Avenue / Dola Avenue, leading into Middle Deal Road) are clearly not capable of coping with additional traffic.</p> <p>51) The trucks going to the recycle center at the end of Church Lane cause additional holdups and building traffic leading into the proposed Site 4 would cause massive traffic chaos.</p> <p>52) With proposed new employment opportunities towards Tilmanstone and Dover, it is not unlikely that inhabitants of the newly build houses would work on these sites, requiring them to travel through Deal (A258), which is according to the Core Strategy "precludes an increase of capacity".</p> <p>53) Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at land between Deal and Sholden.</p>		
		<p>54) Dover is in need for regeneration, Sholden and surrounding areas are not.</p> <p>55) Agricultural land should not be lost to housing as with the increase in population there will be more demand for food. Then have to rely on imported food.</p> <p>56) These sites fall between two Sites of Special Scientific Interest (SSSI) and the World Convention of Wetlands (RAMSAR) and any impact on these has as yet not been answered.</p> <p>57) Proposals for development of this site should be subject to archaeological evaluation in advance of determination of a planing decision.</p> <p>58) Vision is needed to coax people out of their cars, e.g. by creating safe cycle and walking routes and a much more flexible bus services.</p> <p>59) No provision has been made to create allotments, or to introduce micro-generation of energy.</p>		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Support: 1) Allocation of this land, which will have a reduced landscape impact.</p> <p>2) More closely related to the town centre than other direction of growth for the settlement.</p> <p>3) The capacity of the highway network can absorb the development traffic adequately.</p> <p>4) The Flood Risk Assessment has resulted in the EA confirming it will not object to housing development above the 2, 3 metre contour.</p> <p>5) Support for the selection of this site as this site represents the most logical direction of growth for the settlement.</p> <p>6) The town needs development in order to save the High Street we should use this opportunity to develop Deal Town & Sholden before it too late.</p> <p>7) The community facilities to be provided to benefit existing and new residents should include the provision of appropriate open space, sports an leisure facilities.</p>		
148		<p>Comments: 1) If there must be more houses build them in Dover where there are plans to create the bulk of employment.</p> <p>2) Additional housing for the District should be closer to where the new jobs will be e.g. closer to Dover Port, Tilmanstone or the high-speed Rail link.</p> <p>3) Currently the strategy is proposing open space to be on the high ground out of the flood risk area. Sequentially, the high ground should be developed in preference to the area at greater risk.</p> <p>4) The estimated capacity would need to be justified through Transport Assessments and mitigating measures to overcome the practical issues and impact on the local environment would need to be provided in support.</p>		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
PHS013	Land between 51 and 77 Station Road, Walmer, Deal	Objections: 1) Access onto Dover Road from Station Road is very difficult at peak times. 2) Salisbury Road has traffic calming measures and a school, Church Street was not built for high traffic levels. 3) Traffic volumes will be unacceptable unless better access from Station Road to Dover Road is provided. 4) The A258 should be put to the top of the agenda and then further development should be considered once it is safe for people to travel to Deal.		
		Objections: 1) Emergency Access to the proposed development would be currently impossible. 2) Little parking on Mayers Road.		
		Objections: 1) Views to the Ripple windmill from Station Road cannot be protected. 2) Public footpaths across the site would need to be protected		
		Objections: 1) This site should only be developed after further assessment of land in north Deal as an alternative because of the difficult junction of Station Road and Dover Road. 2) The southern boundary should only extend to enclose the area between Mayers Road and John Tapping Close. 3) Major traffic implications for the village of Great Mongeham. 4) Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Station Road, Walmer. 5) Proposals for development of this site should be subject to archaeological evaluation in advance of determination of a planing decision. 6) Prime agricultural land will seriously overload the Junction with the Deal-Dover-Grams Road which is already a potentially danger spot. 7) Loss of open attractive countryside adjacent to a Special Landscape Area and Grade 3A agricultural land. 8) Visual impact on the setting of Walmer and approach to Deal. 9) Impact on groundwater and surface water drainage. 10) Adverse impact on footpaths and views of Ripple Windmill. 11) Loss of countryside.		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>12) Lack of the supporting infrastructure, water supplies etc.</p> <p>13) Lack of facilities, such as schools, health facilities, employment.</p> <p>14) Lack of information about the type, style, cost and proposed housing.</p> <p>15) Economic issue- Recent very weak housing market and observed problems with selling already existing properties leads to the question, why do we need more of them?</p> <p>16) Lack of employment opportunities in the area.</p> <p>17) Flooding issues.</p> <p>18) No provision for expansion of Social Services has been included in the District objectives as part of the recommended infrastructure.</p> <p>19) Use of Grade I Agricultural Land.</p> <p>20) There is already a problem in supplying water to the area.</p> <p>21) The drainage system is old and inadequate.</p> <p>22) Excessive level of the proposed development.</p> <p>23) Limited public transport.</p> <p>24) Lack of any facilities in Walmer: no big supermarkets, no cinema, no leisure facilities.</p>		
		<p>Supports: 1) Supports allocation of land between 51 and 77 Station Road Walmer for future residential development.</p> <p>2) Broad support for SA19 but consider that the boundary should run across the field parallel to Station Road and include the allotments and waste ground between Mayers Road and the Railway line.</p> <p>3) The proposed allocation is in a sustainable location with good access to Walmer Station and to bus routes.</p>		

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
		<p>Comments: 1) The need for improved community facilities in the Walmer area as well as the Sholden area and the increased area here would help to justify this.</p> <p>2) The estimated level of development within this area is likely to affect the Station Road / Dover Road junction. A Transport Assessment would be required and could result in mitigating highway measures.</p> <p>3) It makes far more sense to me to look at perhaps Betteshanger which could become a "new town" with the new road link to the Sholden/Sandwich road or, some allocation near Shepherdswell, where there is greatly improved road access.</p>		
LDF023	North Barracks, Deal	<p>Comments: 1) I would have thought changing the proposed block into the houses/flats (which we are all being advised are needed in the district) would be a much better use of space.</p>		
		<p>Support: 1) The two small business units will provide additional employment opportunities for the increased population that the new housing developments at Sholden, etc. shown in the Local Development plan.</p>		
		<p>Objections: 1) Development of this site should include archaeological mitigation to record or preserve the prehistoric remains present.</p>		
		<p>Support: 1) The provision for no less than 1,500 sqm of business floorspace (Use Class Order B1) and community uses should not be reduced further.</p> <p>2) CPRE support the proposed allocation of the North Barracks site for mixed-use redevelopment. 3) Foul sewer capacity assessments have indicated that there is capacity available to accommodate the proposed development at North Barracks, Deal.</p>		

Deal

Location	Address	Issues raised from Consultation	Consideration of Issues	Recommendation
DEA34	Cannon Street, Deal	<p>Objections: 1) Why at least 20 houses? Another Chapter written by developers and needs to be sorted out.</p> <p>2) Criterion ii - What Masterplan are we being asked to agree to?</p> <p>3) Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Cannon Street.</p> <p>4) The recommendation in the SFRA is that alternative sites should be explored in lower flood risk areas.</p> <p>5) The mix of uses should include a high density residential development with provision for a community facility.</p> <p>6) Development of this site should include archaeological mitigation to record or preserve the prehistoric remains present.</p>		
		<p>Support: 1) CPRE support the proposed allocation of land at Cannon Street, Deal, for mixed-use redevelopment.</p> <p>2) Support site allocation for Cannon Street, Deal but seek amendment to site boundary to exclude existing buildings not proposed for development.</p>		
		<p>Comments: 1) Cannon Street/ Golf Road junction should be improved .</p> <p>2) There is an opportunity to include open space and outdoor recreation provision as part of the proposed community centre at Cannon Street (SA21).</p>		

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Sandwich & Aylesham Representations Summary Table

Aylesham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
AYL01 / SHL083 (IC)	Land to the north of Aylesham Local Plan Expansion Area	Total reps AYL01: 8 SHL083: 6 The provision of a further 500-1,000 dwellings would be appropriate in terms of the scale of the existing and proposed expansion to Aylesham and help support the viability of existing and new services and facilities.	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape. Aylesham already has 1,000 dwellings allocated and this should be developed in the first instance before any further land is allocated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
		Would have a detrimental effect on the surrounding countryside. Any development would be obvious from the B2046 and the railway. It would also present a quite unsuitable urban appearance to the neighbouring village of Adisham. The whole character of the northern edge of Aylesham would be changed. The addition of over a thousand more houses seems to us to be highly illogical. The land is of high agricultural value. (CPRE)		
		Not sustainable - few local jobs, road infrastructure is totally unsuitable. Narrow country road which is totally unsuitable for the existing amount of traffic- an additional 1100 on top of the 1200 already planned will place untenable demands on this already inadequate road. In addition, it would mean an enormous combined suburb for Aylesham of 2300 houses which is far too big for our village - it would irrevocably change the character of it. (Aylesham Parish Council)		
		The residential development would be confined to the lower, eastern part of the site, taking account of the Local Plan Inquiry Inspector's comments on the potential visual impact of development on this land. Residential development would be confined to some 15 hectares of land with open space/woodland provided on the remainder. Additional development would help reinforce the role of Aylesham.		
		Planning Inspector's report of July 1999, this site was refused. That development here would have a wide and adverse visual impact, a prominence increased during the winter months with illumination and loss of leaves from trees, and at the scale proposed would be wholly out of keeping with the land astride the B2046 the scale of development on the skyline would introduce an extensive and unacceptable change to the landscape quality of the land to the West. As there are few signs in the present or medium term economic climate to suggest employment opportunities commensurate with the 1200 houses already planned, let alone the indicated additional 1100 units. (CPRE)		

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Importance of retaining best and most valuable agricultural land. Draft proposals will impinge upon the adjoining countryside within the Canterbury District area. (CPRE)</p>		
		<p>Integration with the proposed Green Infrastructure Framework will enable a more robust allocation of sites with greater consideration of potential impacts on areas of biodiversity importance. This will help to secure the protection and enhancement of the green infrastructure network.</p> <p>Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies in an area that is rich in cropmarks. These cropmarks, which show evidence for buried archaeological landscapes, include enclosures, ring-ditches, field-systems and trackways. Finds from the area include prehistoric worked flint scatters, an Iron Age coin and early medieval brooch. Development should be avoided on parts of the site where significant cropmark concentrations lie. Pre-determination evaluation would be necessary to determine whether development is possible within other parts of the site. (KCC Strategy & Planning)</p>		
		<p>May result in negative impacts upon the setting of the Kent Downs AONB. Assessment of the proposals upon the AONB is undertaken if the site is to be taken further through the allocation process.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All sites	Interim Consultation	Total reps: 2 Increase in housing may result in indirect impacts upon these sites Sandwich Bay to Hacklinge Marshes SSSI, Sandwich Bay SAC and the Thanet Coast and Sandwich Bay SPA and Ramsar Site. Significant provision of alternative greenspace is likely to be required.	The District Council is working on a mitigation strategy (as part of the Green Infrastructure Strategy) for development throughout the District and this has been a consideration as part of the site selection process.	Noted.
All sites	Interim Consultation	A number of sites in neighbouring Local Centres (Ash & Eastry), the Rural Service Centre of Sandwich and the District Centre of Deal have potential to impact on Worth. Planned local infrastructure provision is less than half required for the Adopted Core Strategy of 14,000 new homes in the district. If all the new homes already identified as required by the Medium Growth Strategy in the North of the district are developed, there is great concern that the A258 and local road network is not adequate to carry the anticipated increase in traffic without increasing danger to existing residents and road users. Further development to meet requirements of the High Growth Strategy demands major infrastructure improvements in the North of the District if it is to be sustainable.	Kent Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	Noted.
PHS17 & PHS18	Land to the west of St Bart's Road including Kumar Nursery, Sandwich	Total reps: 20 Congested with parked cars; the large influx of vehicles is not sustainable on the present roads; designated flood plain; village of Woodnesborough will become undefined as a community in its own right; prime farmland. Supported. Road is not wide enough to sustain existing traffic; local schools are not beign enough for demand.	The site analysis forms, which have been drafted with the assistance of KCC Highways, demonstrate that the site is suitable for development. The issues raised by the consultation, such as the wider road network, access, the allotments and open spaces, are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered suitable for residential development and should be allocated in the pre-submission local plan.
		There would be considerable disruption to allotment holders if development is allowed; Woodnesborough Road is badly lit; this site is too big for 100 houses; there are public footpaths and byways in this area. This road is already badly congested with parked vehicles on both sides; allotments may be relocated; instability of the clay on which neighbouring properties are built; concern about impact on water resources and whether the sewage system can cope; local doctors do not have the capacity to deal with large increases in population; area supports wild birds, animals and insects.	The area has also been identified in the adopted Core Strategy as a broad area for urban expansion. The Core Strategy identifies this land to meet local need.	

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>CPRE consider that there is some potential for development in this location, though of a more limited scale than shown. Particularly concerned about the potential risk of further future development to the south west, and great care would need to be taken to ensure that any land allocated now is well contained and provides a firm and long lasting boundary to the town. We note that part of the reason for putting the site forward is to help strengthen the town centre, though no details are given as to what this might involve. Therefore, in the absence of this detail, we do not feel able to support any allocation now.</p> <p>The proposed small increase of housing in Sandwich South is welcome. We note that access to the site will be from Woodnesborough Road at a recognised traffic danger spot. Adaptations to the road will be required together with arrangements for parking (Sandwich Town Council).</p>		
157		<p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development on land to the west of St Bart's Road. The developer should requisition a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water (Southern Water).</p> <p>The number of units proposed would result in the requirement of a Transport Assessment. Emphasise should be made to the effect it would have on the surrounding road network especially St Bart's Road and the Moat Sole, Strand Street area. Mitigating measures may be required (Kent Highways Services).</p> <p>Flood risk from the site and the impact on the natural drainage capacities of the local ditches needs to be thoroughly assessed. This is a bigger priority than the Flood Risk Assessment; The eastern extremity of the site is not needed; the landscaping areas seem to be misdescribed; lack of clarity about development contributions to the town centre.</p> <p>The town already is often gridlocked.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>The site lies between two medieval roads into Sandwich and near to the Sandwich Roman Villa. The development of this site should include provision for archaeological evaluation and mitigation measures (KCC Heritage & Conservation).</p> <p>Important agricultural land; flooding; intrusion into this preserved countryside; traffic issues.</p> <p>There is potential for an acceptable access to be provided to Dover Road through the purchase of additional land and demolition of dwelling in necessary.</p> <p>Sport England welcomes the retention or relocation of allotments as part of requirements for residential development proposals but would like to see specific reference to the provision of open space and any necessary sporting facilities for all existing and new residents as a policy requirement.</p> <p>Supported as it concentrates housing development away from the high flood risk areas and also the historic core of the town within the Conservation Area.</p>		
	Interim Consultation	<p>In terms of density, there is no longer a minimum of 30 dwellings per acre and given this situation, the number of units on this site should be reduced and replaced elsewhere.</p> <p>Traffic generation will have a large impact on adjacent roads, the Council needs to be certain that the appropriate amount of infrastructure is in place in advance of the release of the site.</p>		
SHL058	Land at Bellar's Wood Nursery, Sandwich Road, Sandwich	<p>Total reps: 12</p> <p>Suitable for use as employment land; a redundant former nursery; well located on the road network; easily accessed by public transport</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to poor pedestrian and vehicle access and a detrimental impact on the wider landscape. The site is also divorced from the town.</p>	<p>The site is considered to be unsuitable for employment or residential development and as such has not been allocated in the Land Allocations Local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>The land floods. No mains drainage to the site.</p> <p>No gas supply.</p> <p>No objection to the proposals. (Sandwich Town Council)</p> <p>Potential for use as employment land. Well located on the outskirts of the town, but within easy reach of the town centre and residential areas. The site is well located on the convergence of the three principal 'A' roads and on a regular bus route.</p>		
		<p>In low lying land outside the Settlement Confines. These sites are in or adjacent to the Flood Plain.</p> <p>Construction would be an intrusion into this preserved countryside. Will increase discharge to the same flood plain. Adjacent to or in the Lydden Valley Flood Plain. Increase road traffic movements on the traffic accident blackspot that is the A258 between Deal and Sandwich.</p>		
		<p>High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)</p>		
		<p>The site is physically divorced from the village confines. Detrimental impact on the countryside. There is no access to the site. Providing an access would be unacceptable as it is too close to the very busy roundabout. No mains drainage. Two thirds of the site is classed as grade one agricultural land. (Woodnesborough Parish Council)</p> <p>In low lying land outside the Settlement Confines. Adjacent to the Flood Plain. Close to a Ramsar Site and a SSSI. Intrusion into countryside. Increase road traffic movements on the traffic accident blackspot A258. No fixed speed cameras on this stretch of the A258.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Unsustainable and in a remote location.</p> <p>A single narrow access direct from the roundabout. Mains drainage and mains gas are not available. Flat with a very gentle slope towards the southeast corner of the site. During the winter months site often become water logged. Excessive surface water drains into a dyke. Approximately thirty-five years ago the southern section of the Bellers Bush site was extensively flooded when the drainage dyke became obstructed. On grade one agricultural land. Support a wide range of wild life.</p>		
		<p>Will have detrimental effect on the two existing businesses. Loss of local employment and a local tourist attraction. Current access to the Bellers Bush site is owned by the occupants of 1 Bellers Bush. Access to the Bellers Bush site is inadequate. There is currently no provision for pedestrians on the A256 Eastry/Deal roundabout. Part of the land is developing into a small wood containing several established trees between 7 and 9 metres high.</p>		
		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site. (KCC Strategy & Planning)</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
PP09	Sandwich Industrial Estate	<p>Total reps: 8 This land already has planning permission (CPRE).</p> <p>The proximity of this site to the Sandwich Bay to Hacklinge Marsh SSSI, Sandwich Bay SAC and Thanet Coast to Sandwich Bay SPA and Ramsar site means that careful consideration needs to be given the special interest features (Natural England).</p> <p>The evaluation of Sandwich Industrial Estate is soundly based and appropriate (Sandwich Town Council).</p> <p>Cannot comment on the foul sewerage capacity to accommodate development at Sandwich Industrial Area as it connects to private system (Southern Water).</p> <p>Delete the requirement for a riverside walk and cycle route as the site does not adjoin the River Stour.</p> <p>Sport England supports the requirement for green travel plans for development proposals.</p>	<p>This site has planning permission for employment uses.</p> <p>The site is located within Flood Zone 3 and would be unsuitable for residential development.</p>	<p>The site has planning permission for employment. It is therefore not necessary to allocate the site in the pre-submission local plan.</p>
		<p>Objection to omission of policy supporting mixed use redevelopment: brownfield land, planning permission to the south granted; access through Sandwich Ind Estate; site is located a short distance from the centre of Sandwich; opportunity for significant environmental enhancement; scheduled ancient monument would gain an enhanced setting; enhancement of the landscape; site will be protected from tidal flooding by existing flood defences.</p>		
PHS019	Sunnyside Nurseries, Woodnesborough Road	<p>Site provides essential 'Habitat Corridors', the future of this valuable resource would be secured as a requirement of the proposal; help to protect and sustain the existing park land/playing field located in Poulders Gardens; would cause minimal disruption to the landscape, as it is already screened off; Access to the site would cause very limited disruption; three access points are available; Loss of agricultural land would not be an issue as Sunnyside Nurseries has been intensively farmed as a smallholding for many decades, thus leading to depletion in the quality and fertility of the soil.</p> <p>Access could be achieved between 127 Woodnesborough Road and the unadopted access serving the garages to the rear of the properties along this road and scout hut.</p>	<p>Sunnyside Nurseries was identified as being suitable for residential development in the Preferred Options Site Allocations Document. The site has now been re-assessed as it is now concluded that it would have a detrimental impact on the landscape and the site is partly within flood zone 3.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Poulders Road is an un-adopted road, it has no footpaths, no storm water drainage, partial street lighting (just two), and is a single track road only; A more logical access would be via continuation of Sunnyside Gardens or via the track that leads to Sunnyside Nurseries and the local scout hut; the increase in traffic would be intolerable.</p>		
		<p>The proposed access is not suitable; Woodnesborough Road is not suitable to take additional traffic; flood risk; Schools, Doctors, Dentists etc could not cope with the extra population; Water & sewage would need to be looked at very carefully.</p> <p>Not a brownfield site.</p> <p>Road is narrow.</p> <p>Illogical extension of the urban area into the countryside (CPRE).</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development. The developer must requisition a connection to the sewerage system at the nearest point of adequate capacity (Southern Water).</p> <p>The site lies close to a medieval motte and bailey castle which appears to guard an inlet to the west of Sandwich. The archaeological potential of this area is generally unknown. Development of the site should include provision for archaeological evaluation and mitigation measures (KCC Heritage & Conservation).</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Currently serviced by a private road.</p> <p>Loss of agricultural land; problematic site access; increase in traffic; flood risk area; effect on wildlife; loss of Sandwich identity by increased urbanisation.</p> <p>Sunnyside Gardens is not wide enough to accommodate two-way traffic; infrastructure needs to be carefully looked at.</p> <p>Poulders Road is not suitable for purpose; the road is single track with no footpaths or proper street lighting and very dangerous junction to negotiate, onto the Woodnesborough Road; it is a private road maintained by the residents.</p> <p>Lack of street lighting.</p> <p>The junction at Poulders Road and Woodnesborough Road is dangerous and unsafe for HGV vehicles to negotiate.</p> <p>Greenfield site; the public footpath to the side of the site is not shown on the site map; drainage is poor.</p> <p>Impact on Bat colony.</p>		
	Interim Consultation	<p>In terms of density, there is no longer a minimum of 30 dwellings per acre and given this situation, the number of units on this site should be reduced and replaced elsewhere.</p> <p>Traffic generation will have a large impact on adjacent roads, the Council needs to be certain that the appropriate amount of infrastructure is in place in advance of the release of the site.</p>		
PHS020	Land to the rear of St Andrew's Catholic church, St George's Road, Sandwich	<p>Total reps: 6</p> <p>The access and tree cover issues can be dealt with easily; closer to the Town Centre than the other sites; it is well protected.</p> <p>Affords direct and easy pedestrian and road access without having to utilise narrow and awkward streets; the majority of the site lies above the flood risk zone; close to Sir Roger Manwood's School and railway station; possible to access the site adequately without any loss of major tree cover; St George's Road is a far better road than Woodnesborough Road for serving small scale development; loss from agriculture is not significant.</p>	The site analysis form demonstrates that the site is unsuitable for development due to a constrained access and the detrimental impact on the wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>No objection (Sandwich Town Council)</p> <p>Access issues. Point of access would be onto a difficult part of St Georges Road being on , or close, to the bend. Dramatic change to what is a currently a rural location.</p> <p>On the edge of urban Sandwich yet excluded from the flood plain. A small part of the site is on the edge of the flood plain. No built development is proposed or suggested on this flood plain.</p> <p>A very sustainable location close to the railway station, bus routes and local schools. All the services and facilities of the town can easily be reached on foot. The land is available for development in a single ownership and is actively being promoted for an early release within the Plan period.</p> <p>It already has a strong well defined boundary which can reduce its visual impact on the adjacent open countryside.</p> <p>Two access points on St Georges Road.</p> <p>There is no special statutory landscape designation restricting the release.</p> <p>Site is not especially prominent in the landscape setting of the town.</p>		
		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. . Development with archaeological measures may be possible on this site. (KCC Strategy & Planning).		
SAN10 (IC)	Land to the rear of St. Andrews Catholic Church, St George's Road	<p>Total reps: 1</p> <p>There is scope to create an attractive scheme of private/affordable housing inclusive of amenity land/public open space land excluded from the flood plain. A safe access and a development that does not harm the landscape of the area.</p>	See above	See above
SAN02	Land adj to 168 The Crescent, Dover Road, Sandwich	<p>Total reps: 1</p> <p>Development could protect any trees of significance and maintain a screen to the main road. This land has less intrusion into open countryside; would not lead to any significant increase in traffic.</p>	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL046	Land at 17 Woodnesborough Road, Sandwich	Total reps: 8 The site performs well in sustainability terms, providing a site contained by the existing settlement with no impediment to access or delivery. The site is capable of providing significant landscape and amenity benefits, and has no comparable alternative within the vicinity that can offer such a considered and suitable development option. The site satisfies the PPS25 exception test and is capable of development in a manner that mitigates any flood risk. Suitable for mixed use residential and employment development.	The site analysis form demonstrates that the site is unsuitable for development as the site within flood zone 3 and the area of maximum breach.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.
	Interim Consultation	High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)		
		Objects on the grounds of over-development of site, lack of suitable access. Flood plain. (Sandwich Town Council) Amended level of flood risk advised by a revised flood risk assessment. Primarily previously developed. In a single ownership. Submitted as a prospective employment and housing site. New employment floorspace would serve to maintain local jobs whilst improving the quality of the built form.		
		The latest information published by the Environment Agency indicates that this area of Sandwich is actually less likely to flood than was previously thought. An amended FRA has been prepared by Herrington Consulting. The land is located to the west of the existing railway embankment which is between the site and the sea. The nearby level crossing between nos 15 and 13 is raised over this line, which would also provide some flood relief. The potential exists to introduce an appropriately designed Sustainable Urban Drainage System (SUDS) in order to attenuate surface water flows. It is proposed to close the access to the builder's yard and that serving no 17 off Woodnesborough Road and provide a single replacement access along the private road. This road is of a limited width with a narrow footway on one side but this can be improved upto modern standards. Full parking would be provided within the site so no impact on the existing on-street parking would arise. The site is in a single ownership is available and deliverable.		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>High Risk in the SFRA. (Environment Agency)</p> <p>Loss of employment and access.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies outside of the walls of the historic medieval town of Sandwich close to one of the town's gates and adjacent to the line of the medieval road between Sandwich and Woodnesborough. The line of this road may have had Roman origins. A possible motte and bailey castle and medieval remains have also been identified on Mary-le-Bone Hill to the west. Development with archaeological measures may be possible on this site. (KCC Strategy & Planning)</p>		
SHL074	Sandwich Industrial Estate	<p>Total reps: 7</p> <p>The Sandwich Industrial Estate has a number of disused areas which would be far more suitable for residential development.</p> <p>Object to the omission of Sandwich Industrial Estate.</p>	The site analysis form demonstrates that the site is unsuitable for development due the detrimental impact on the setting of the historic town through the loss of the green space leading to it. The site is also within flood zone 3.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.
	Interim Consultation	<p>Site should be maintained for light industrial use. On the flood plain. (Sandwich Town Council)</p> <p>High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)</p> <p>Loss of employment land.</p> <p>Objects to development so near to the designated sites. Is situated only 122m away from the Thanet Coast and Sandwich Bay SPA and Ramsar sites and Sandwich Bay SAC. Tree and hedgerows are retained with the hedgerows being strengthened and buffered wherever possible. Within the larger sites we recommend that corridors of natural habitat reflecting that present within the surrounding areas be designed into the infrastructure. (Kent Wildlife Trust)</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies on a shingle bank which is understood to have developed within the Wantsum Channel from some six thousand years ago. By the Roman period the bank lay above sea-level and Roman remains including stone-lined graves, coins, and pottery are recorded from the site. In the medieval period the bank was the location of the port and town of Stonar but the site was abandoned in the second-half of the fourteenth century when the site became inundated following a great storm. Much of the proposed area is designated as a Scheduled Monument and any works within the scheduled area will be subject to consent being granted by the Secretary of State. Pre-determination evaluation would be necessary to determine where development is possible within the site and development of parts of the site would likely need to be avoided. (KCC Strategy & Planning)		
SHL074V (IC)	Land at Sandwich Industrial Estate	Total reps: 3 High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)	The site analysis form demonstrates that the site is unsuitable for development as the site within flood zone 3 (alternative sites outside the flood risk need to be considered) and would entail the loss of employment land.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.
		Objects. The site should be maintained for light industrial use. Employers should be encouraged to the area and there seems little merit in building houses on this site if no employment in the area exists or is created. Site is on the flood plain. (Sandwich Town Council) Loss of employment land, highway generation and the poor surrounding environment being unsuitable in amenity terms for housing.		
SHL065	Land at Sydney Nursery, Dover Road, Sandwich	Total reps: 4 Only the south eastern part of the site falls within the flood risk area; the nursery site could provide a new access to be taken from the Sandwich By-Pass; the site is well related to existing public transport, services, schools and employment opportunities within the town; would have less impact on the historic setting of Sandwich; would be well screened.	The site analysis form demonstrates that the site is unsuitable for development due to the poor highway network leading to the site.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	Objects as it is a greenfield site. Outside the confines. Dover Road extremely busy and already congested road. As this site is adjacent to Sandwich Technology School playing fields, the area might be used by the school in the future for additional sports activities. (Sandwich Town Council)		
		The Strategic Flood Risk Assessment, indicates that the central, and northern, parts of the site are not subject to any flood risk. The south eastern third does, however, lie within Flood Zones 2 and 3. In this respect, however, the site performs no worse than potential allocation Site 5.		
		Sydney Nursery is the principal means by which the Council could improve accessibility to the Dover/Woodnesborough Road area. A new access could be taken from the Sandwich By-Pass, through the Sidney Nursery Site, to open up this area. Well related to existing public transport provision, and service and employment opportunities within the town. Development of the site would have little impact upon the historic setting of Sandwich and the character of the surrounding countryside. Buildings would be well screened by both existing development and mature landscape features.		
		In low lying land outside the Settlement Confines. These sites are in or adjacent to the Flood Plain. Construction would be an intrusion into this preserved countryside. Will increase discharge to the same flood plain. Adjacent to or in the Lydden Valley Flood Plain. Increase road traffic movements on the traffic accident blackspot that is the A258 between Deal and Sandwich.		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site. (KCC Strategy & Planning)		
SHL055	North Poulders Farm, Richborough Road, Sandwich	Total reps: 10 Access problems (Sandwich Town Council). This area has never flooded during the last 50 years. Easy walking access to the town and amenities.	The site analysis form demonstrates that the site is unsuitable for development due the detrimental impact on the wider landscape and the site is within flood zone 3 and the area of maxium breach.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)		
		Objects flood plain. Outside the confines of Sandwich. (Sandwich Town Council) High Risk in the SFRA. Needs to consider the river's setting and the importance of the river as Green Infrastructure in Dover District. (Environment Agency)		
		Impacts on Ash Levels and South Richborough Pasture within 242m of DO21 Ash Levels and South Richborough LWS designated for its wet dykes, open water and associated flora and fauna. Although this site is relatively small we recommend that habitat to reflect the LWS are created within the development with some monies negotiated for management of the LWS. Tree and hedgerows are retained with the hedgerows being strengthened and buffered wherever possible. Within the larger sites we recommend that corridors of natural habitat reflecting that present within the surrounding areas be designed into the infrastructure. (Kent Wildlife Trust)		
		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site. (Kent County Council Strategy & Planning)		
SHL054	Land at Dover Road, Sandwich	Total reps: 5 Site is well defined; the site is between and opposite existing development and is nearer the centre of the town than the Secondary School; within easy walking distance of the town station, schools and the town centre; there is no record of this land having been flooded.	The site analysis form demonstrates that the site is unsuitable for development due the detrimental impact on the Conservation Area through the loss of the open space which contributes to its character and the site is within flood zone 3.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.
	Interim Consultation	High Risk in the SFRA. Developers to have early consultation with the EA to determine appropriate design together with access and egress arrangements. (Environment Agency)		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Objects. Is a greenfield site. Access and sight lines are poor and a bridge would need to be constructed over the waterway. The volume of traffic in this area is also already excessive. (Sandwich Town Council)</p> <p>High Risk in the SFRA. (Environment Agency)</p> <p>Loss of agricultural land, impact on prominent open countryside. Detrimental impact on the historic setting of the listed buildings on the opposite side of the road.</p>		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site. (KCC Strategy & Planning)		
SHL038	Downsbridge Gardens, Sandown Road, Sandwich	<p>Total reps: 7</p> <p>Land should be included for development.</p>	The site analysis form demonstrates that the site is unsuitable for development as the site is divorced from the main settlement with no public transport links, and it falls within Flood Zone 3 and the area of maximum breach.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.
	Interim Consultation	Unsuitable location and divorced		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site.		
SAND14	Land between 127 and 131 Woodnesborough Road, Sandwich	<p>Total reps: 3</p> <p>The site is at the extreme edge of the maximum breach extent and is some distance from the coast and River Stour and will not be subject to rapid inundation. The site is close to the limit of the flood extent and therefore would be a very low depth of flooding which could be mitigated through design</p>	The site falls within Flood Zone 3 and within the Maximum Breach area. In addition the site would accommodate less than five units and so could not be allocated.	The site is considered to be unsuitable for residential development and should not be allocated in the Land Allocations Local Plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>3 homes excessive. Over-development of site. (Sandwich Town Council)</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies on the line of the medieval road between Sandwich and Woodnesborough which may have had Roman origins. Medieval remains have been found to the south-west on Poulders Road, whilst a possible motte and bailey castle and further medieval remains have been identified on Mary-le-Bone Hill to the north. Development with archaeological measures may be possible on this site. (KCC Strategy & Planning)</p>	The site is within the settlement confines and if it can be demonstrated that there are no alternative sites within a sequentially preferable flood zone location, could be considered through the Development Management processes.	
NS03SAN (IC)	Land at Rose Nursery, Old Dover Road, Sandwich	<p>Total reps: 24</p> <p>In low lying land outside the Settlement Confines. These sites are in or adjacent to the Flood Plain.</p> <p>Construction would be an intrusion into this preserved countryside. Will increase discharge to the same flood plain. Adjacent to or in the Lydden Valley Flood Plain. Increase road traffic movements on the traffic accident hotspot that is the A258 between Deal and Sandwich.</p>	The site analysis form demonstrates that the site is unsuitable for a hotel development due to there being no suitable access to the site and no sequential test for town centre uses.	The site is considered to be unsuitable for a hotel development and should not be allocated in the Land Allocations Local Plan.
		<p>Site could be utilised to accommodate an 80-bed facility with access off the A256 and a secondary access onto Dover Road. The site immediately available for hotel purposes. Discussions with Kent Highway Services confirmed that it would be possible to introduce either a new roundabout junction on the A256 or alternatively provision of a site access onto the old Dover Road with the reopening of the existing access. Able to be served by walking, cycling and use of public transport. Not affected by any considerations of flooding. Impact on the local landscape can be mitigated by generous boundary planting.</p>		

Sandwich

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>The noise and pollution would have an impact on our family life. The road is dangerously narrow. Motel will be built on an already busy roundabout which is at capacity.</p> <p>Dover Road is not suitable for increased traffic.</p> <p>Would result in loss of revenue for hotels in Sandwich.</p> <p>The road is busy especially on school days. Access to the hotel site should only be from the by-pass. No traffic access to Dover Road.</p>		
		<p>Does Sandwich really need to have this development of a motel. The land adjacent to us was recently the subject to a planning application for the erection of a detached dwelling at the end of the road - this was refused after appeal - one of the reasons being that, in the words of the Dover District Council, the above mentioned application would be "detrimental to the visual character and rural nature of the surrounding landscape".</p> <p>There are no local shops within walking distance.</p> <p>Very detrimental to Sandwich businesses.</p>		
		<p>This site is incorrectly named as being in Old Dover Road . It is in fact in Dover Road . The town council is opposed to any development on this site at the present time.</p>	Noted	
		<p>A dedicated access directly off the A256 only serving the facility is possible and is not objectionable in highway terms. Existing traffic using Dover Road would not need to be diverted. Given the existing tree cover and embankments adjacent to the site, the proposal would be able to be assimilated into the local landscape with no undue impact. Interrogating the latest information published by the Environment Agency confirms that the area north of Dover Road is not at risk of flooding even due to extreme tidal floods.</p>	Kent County Council disagree with this statement.	

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Petition received with 65 identical letters of objection.</p> <p>In low lying land outside the Settlement Confines. Adjacent to the Flood Plain. Close to a Ramsar Site and a SSSI. Intrusion into countryside. Increase road traffic movements on the traffic accident blackspot that is the A258. No fixed speed cameras on this stretch of the A</p>		
NS01SAN (IC)	Land at Jubilee Road	<p>Total reps: 2 No objection. (Sandwich Town Council)</p> <p>Site fronts Jubilee Road in 30mph speed limit. Good access potential with footways on both sides of the carriageway and no traffic regulation orders. (KCC Strategy & Planning)</p>	The site analysis form demonstrates that the site is unsuitable for development due to the loss of open space. The site also falls within Flood Zone 3.	The site is considered to be unsuitable for a hotel development and should not be allocated in the Land Allocations Local Plan.
SAD08	Land to the south of pharmaceutical company	<p>Total reps: 1 6 hectares at the southern-most extent. In the light of circumstances that the Council may not have been aware of at the time the designation was being considered, it does not represent the most appropriate use of the land over the plan period up to 2026.</p> <p>It is felt that one important way in which this can be facilitated is to secure a planning framework for the site which retains a strong Pfizer "heart" to the site and consolidating other employment generating uses on the site by seeking occupation of vacant buildings by third parties, together with the introduction of land uses complimentary to Pfizer and without any adverse impact to the vitality and viability of Sandwich.</p>	This area has been designated as an Enterprise Zone and is subject to a LDO	Site to be considered in the Discovery Park Local Development Order.
		That they may include light industrial, "trade counter", retail, hotel, leisure and senior living and residential uses. Request that the existing SAD08 designation on Figure 2.1 of the Site Allocations Document be changed from affecting not just the southern part of the site, but affecting the whole of the Pfizer site (excluding nature conservation and ecological designations) and for the designation to be changed to "Mixed Use". (Pfizer)		

Rural South Representations Summary Table

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	<p>Total Reqs: 3 Concerned that all of the consultation sites fall within the Kent Downs AONB and lie outside of the existing built confines. As such, Natural England recommends that where significant direct and indirect impacts upon the AONB will result, the site should not be allocated (Natural England).</p> <p>No immediate service in village. Services provided from Hawkinge, Elham and Lyminge (NHS Eastern and Coastal Kent).</p> <p>All sites (with the exception of ALK01C) appear to comprise improved grassland habitat and therefore are unlikely to be very biodiverse. Consideration will need to be given to the presence of reptiles within any planning application process. Due to the woodlands within the area we recommend that the sites be used to try to improve the grassland and hedgerow network (KWT).</p>	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
All Sites	Interim Consultation	The Parish Council is adamantly opposed to any excessive development of Alkham village, given the size of the village, the lack of any services or facilities and the limited infrastructure and transport links. The PC is aware of the need for some limited 'affordable' housing to encourage young families to be able to find accommodation in the area and any development within the village must include a reasonable proportion of affordable/low-cost housing with restrictions to ensure that local families have priority both initially and in the future.	The requirement for affordable housing as part of any development proposal is set out in Policy DM5 of the adopted Core Strategy.	Noted.
All Sites	Interim Consultation	The PC is concerned about the visual impact of any substantial development given the areas status as an AONB and particularly in the vicinity of the conservation area; it is imperative that any development is sympathetic to and echoes the existing mix of styles and types of houses within the village and does not result in a mass of similar or duplicated units which creates an incongruous effect overall. The Council would insist that due attention is given to the risk of flooding of the Nailbourne river; this is particularly relevant to proposed sites ALK01, ALK02V and NS03ALK (Alkham PC).	The site analysis forms (examining each site individually) have included an analysis of the impact any development would have on the setting of the AONB and wider landscape impacts, the biodiversity interests, conservation and heritage issues, and access arrangements.	Noted.
ALK01C	Land at Fairacres, Alkham Valley Road, Alkham	<p>Total reps: 3 Revision of the confines will provide a more realistic conclusion to this edge of the village. Would not be harmful to countryside protection policies nor any historic environment.</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, the biodiversity interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
ALK01C (IC)		<p>Very poor access arrangements and especially the junction onto Valley Road; the geography of the site is such that a suitably-sized development could be achieved without unacceptable visual impact (Alkham Parish Council).</p> <p>This site appears to contain dense tree cover. Due to the woodland complex within the area although not ancient woodland the tree cover is likely to be play an important part in the functioning of the habitat network. We recommend that this site is excluded from development (Kent Wildlife Trust).</p>		
ALK01C (IC)		<p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. There has been limited systematic archaeological investigation within or around the village of Alkham. No archaeological remains are known from the site itself although there is some evidence for prehistoric activity in the general area. An Iron Age coin is recorded as having been found on the neighbouring piggery site. Development with archaeological measures may be possible on this site (KCC).</p>		
ALK01	Land south of Short Lane, Alkham	<p>Total Reps: 3 The site is not currently in use. Although it would appear to be at risk of river flooding on the Environmental Agency Flood Map, there is no evidence of this land having been inundated in the past. Site would add to the housing stock in the village. This site is similar to that at Nelson Park, St Margaret's. Would have little impact on biodiversity.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. The majority of the site falls within Flood Zone 3; in the first instance alternative sites should therefore be explored for residential development. The site form has included an analysis of the impact any development would have on the setting of the AONB, the biodiversity interests and concerns relating to the capacity of proposed access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
ALK01(IC)		<p>The site lies within the AONB and also within Flood Zone 3.</p> <p>This site is at significant risk of flooding when the Nailbourne floods, however some limited and appropriate development of this site might be acceptable. This site (and NS03ALK) would create considerable highways problems by reason of the increased traffic at the Valley Road/Short Lane junction; this location already presents considerable difficulties because of the slope of Short Lane and the speed of traffic. Any development should include provision for suitable improvements to the access onto the Valley Road (Alkham Parish Council).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
ALK01(IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. There has been limited systematic archaeological investigation within or around the village of Alkham. No archaeological remains are known from the site itself although there is some evidence for prehistoric activity in the general area. Development with archaeological measures may be possible on this site (KCC).		
NS01ALK (IC)	Malmains Farm land, Alkham Road, Alkham	<p>Total Repts: 12 Please note that this site appears to include our property 'Bramhall', this property has neither been called for nor offered as a potential site for development. We wish you to amend your documents immediately.</p> <p>280 possible dwellings would add to the surface run off which drains into the bottom of the Alkham Valley water course. This water course known as the Alkham Nailbourne floods periodically and any additional run off contribution would exacerbate an already critical situation.</p> <p>AONB; within sight of the conservation area.</p> <p>Existing infrastructure will not support this proposal; no school in Alkham; already pressure on existing River surgery; no suitable access; poor bus service; regular flooding along the valley; Alkham is often hit by power failures.</p> <p>Would change the scale and character of the village.</p> <p>The proposed development is the same size as Alkham is today; outside the confines.</p> <p>Where are all the employment opportunities to come from to meet the requirements of all these extra families?</p>	In response to the representation, the site boundary has been amended to exclude the property 'Bramhall'. The site analysis form demonstrates that the remainder of the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact, biodiversity interests and problematic access arrangements. Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Alkham.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
NS01ALK (IC)		The proposed development of this site is entirely inappropriate given the matters set out above; it would, if implemented, more than double the size of and irreparably change the whole nature of the village. In addition the geography and nature of the site (sloping towards the road and extending the village considerably beyond its present confines) would mean that the visual impact of the development would be huge and would change the appearance and perception of the settlement from a small community gradually built up over an extended period to that of a massive		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01ALK (IC)		housing development overwhelming and swamping the original village. Access to the site could only be achieved onto the Valley Road and would have significant highway implications given the steep slope and poor visibility in both directions. Even assuming a modest number of vehicle movements per unit, the development would result in a substantial increase in the total amount of traffic using the Valley Road, which already has a very poor safety record generally (a number of fatalities at either end of the road in recent years) and creates enormous peak-time difficulties at the junctions with Hawkinge Road (A260) at the western end of the valley and London Road at Kearsney/Temple Ewell at the eastern end. It is likely that even if this site were to be developed it would not create sufficient demand (economic or social) to justify the provision of any additional services, e.g. shop, surgery, etc., such as would benefit the village (Alkham Parish Council).		
NS01ALK (IC)		Although the Trust has no objections in principle to the sites identified for development we are concerned regarding the possible impacts on Alkham, Lydden and Swingfield woods SSSI both individually from NS01ALK and in combination with other development planned around Dover. KWT recommend that if NS01ALK is delivered then a resilient avoidance, mitigation and compensation package is devised including a multifunctional Green Infrastructure, alternative natural open space and extensive corridors throughout the development combined with monies to ensure the SSSI is managed and buffered to increase its resilience to		
NS01ALK (IC)		recreational pressure. Protection of DO35 Alkham Churchyard and DO33 Malmain's Manor Pastures Local Wildlife Sites - NS01ALK is 84m away from DO35 and 152m away from DO33. These sites are designated in part for their grassland and may suffer from degradation of this habitat with such a sizeable development within close proximity. We recommend that if this site is developed alternative natural green space and extensive corridors be provided as part of the development design with buffering to DOS 3. Impacts on DO 13 South Alkham Farm and Lockering Wood should also be considered (KWT).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01ALK (IC)		<p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. There has been limited systematic archaeological investigation within or around the village of Alkham. There is some evidence for prehistoric activity in the general area and a early medieval and medieval metal work finds have been recorded on the site in question. Given the size of the area in question it is possible that presently unknown archaeological remains may be affected by development of the site. Development with archaeological measures may be possible on this site (KCC).</p> <p>This very large extension of 285 homes within the AONB is unacceptable. The AONB unit would not be averse to minor infill and extensions if carefully achieved and designed and which are in response to local need and fit with AONB management Plan Policies. This allocation suggested however does not fit these criteria and would fall outside the Management Plan policies listed above (Kent Downs AONB).</p>		
ALK02V (IC)	Land to the west of Hill View, Short Lane, Alkham	<p>Total Reps: 3 The site lies within the AONB.</p> <p>Although the revised plan includes a very narrow access strip, this would be inadequate and inappropriate for the additional eight houses proposed in the SAD. The effect of developing this site would be to 'box in' the Vicarage Meadow and would adversely effect the visual amenity of the picturesque centre of the village. The proposed density of housing for this site seems unlikely to be achievable on this site and would contrast unacceptably with the existing properties at the southern end of Short Lane. In addition the site is very likely to be subject to flooding when the Nailbourne rises and the Vicarage Meadow floods, in particular the proposed access road follows the path of the dyke marking the route of the Nailbourne (Alkham Parish Council).</p>	The site analysis form demonstrates that the site is unsuitable for development. Part of the site falls within Flood Zone 3; in the first instance alternative sites should therefore be explored for residential development. The site form has included an analysis of the impact any development would have on the setting of the AONB, the impact on the adjacent conservation area and concerns relating to the capacity of proposed access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
ALK02V (IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. There has been limited systematic archaeological investigation within or around the village of Alkham. No archaeological remains are known from the site itself although there is some evidence for prehistoric activity in the general area. Development with archaeological measures may be possible on this site (KCC).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS03ALK (IC)		<p>Total Reqs: 4 The site lies within the AONB.</p> <p>Support - A range of options for unit numbers are suitable on this site, and should reflect the actual identified needs of the village rather than the capacity of the site as determined by the extent of the owners' holding. Approximately 15 units would be feasible in this location. This is partly due to the southern 40% of the site (subject to a full survey) lying within the flood plain. The site would then form a consistently identifiable and justifiable eastern boundary to the village envelope. The number of units suggested reflects proportionally the relatively small size of the village.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. Part of the site falls within Flood Zone 3; in the first instance alternative sites should therefore be explored for residential development. The site form has included an analysis of the impact any development would have on the setting of the AONB, biodiversity interest and concerns relating to the capacity of proposed access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
NS03ALK (IC)		<p>The Parish Council's main concern about development of this site would be as regards the visual impact, particularly when approaching the village from the Dover direction; it would be preferable to achieve a "soft edge" to the village at this point (minimizing the present impact of the existing properties to the north of this site). It should be remembered that when permission was granted for the affordable/low cost houses at the northern end of Short Lane it was made clear that that development would not be taken to extend the village envelope (as confirmed by the plans supplied with the SAD) or to encourage further development to the east of Short Lane. While the southern edge of this site might be susceptible to flooding the remainder of the site should be relatively safe (depending where access to and from the site was located). The suggestion of 17 houses seems excessive (Alkham Parish Council).</p>		
NS03ALK (IC)		<p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. There has been limited systematic archaeological investigation within or around the village of Alkham. No archaeological remains are known from the site itself although there is some evidence for prehistoric activity in the general area. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
		<p>Protection of Folkestone to Etchinghill Escarpment SAC and SSSI and The Warren SSSI Capel-le-Ferne is situated immediately to the north of Folkestone Warren SSSI and within around 1km of Folkestone to Etchinghill Escarpment SAC and SSSI. Within the site selection, consideration should be given to the protection of these sites from recreational pressure wherever possible. All sites situated to the extreme south of Capel-le-Ferne along the Old Dover Road opposite Folkestone Warren SSSI be excluded from any development. Within the developments, especially those containing sizable numbers of houses if allocated, the Trust would advise that a Green Infrastructure providing natural open space and extensive corridors be planned within the development site and that an avoidance mitigation and compensation package is formulated to avoid impact on the Warren SSSI and Folkestone to Etchinghill Escarpment SSSI and SAC both individually and in-combination with other development within the rural area, Dover District and East Kent. All sites identified appear to be agricultural and are therefore likely to contain little biodiversity. There is however the</p>	<p>The site analysis forms (examining each site individually) have included an analysis of the impact any development would have on the setting of the AONB, wider landscape impacts, biodiversity interests and access arrangements.</p>	<p>Noted.</p>
		<p>remnants of a hedgerow network within the area. The boundary hedgerows are retained within the design of the developments and strengthened, buffered and connected into the wider network. Larger sites should contain corridors of natural habitat to ensure migratory routes remain open. Consideration will need to be given to the presence of reptiles and bats within any planning application process (KWT).</p> <p>Natural England is concerned that some of the consultation sites (particularly SAD01 and 02) fall within the Kent Downs AONB and lie outside of the existing built confines. As such, Natural England recommends that where significant direct and indirect impacts upon the AONB will result, the site should not be allocated.</p> <p>Tipping point reached at 367 residents / 150 units Growth would need to be picked up by Hawkinge surgeries with Capital investment. PCT considering support for additional new surgery developments at Folkestone Road, Dover and Southern Way, Folkestone (NHS Eastern and Coastal Kent).</p>	<p>The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.</p>	<p>Noted.</p>
All Sites	Interim Consultation			

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total Reqs: 9 There are a number of sites in the south of the district that could either individually or in combination have the potential to adversely impact the safety/operation of the trunk road network, for example: Capel-le-ferne (SAD01 and SHL091) and West Hougham (NS01HOU) are located close to the A20 and Elvington & Eythorne (SHL088, SHL089 and NS01EYT); St Margarets at Cliffe & Bay (SHL073 and SAD28); and Shepherdswell (SHL075) are located close to the A2. As with the sites identified in other areas of the district if any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. We would expect to see mitigation measures put forward, as appropriate, to address any identified impact on the A20 and A2. These might include modal shift measures, such as contributions to improved public transport (Highways Agency).		
All Sites	Interim Consultation	Allocating areas for large numbers of housing in the AONB around Capel-le-Ferne would change the character of this community which is within and on the boundary of the AONB. There would seem no justification or need to develop in the AONB in the following sites: All would have a major impact on the AONB and create unacceptable visitor pressure. SH091 - on edge of AONB boundary overlooked from all sides. Large development of 186 homes SAD01 in AONB, large development of 215 homes CAP02M in AONB, large development SAD02 in the AONB. The following sites on and very near the boundary of the AONB are also very sensitive; other nearby or adjacent sites have been excluded. There seems no justification for inclusion. SHL085 AONB boundary to the west SHL060 Surrounded on west by AONB boundary SHL047 and NS01CAP - AONB boundary to the south The AONB unit would not be averse to minor infill and extensions if carefully achieved and designed and which are in response to local need and fit with AONB management Plan Policies. The allocations suggested however do not fit these criteria (Kent Downs AONB).		
CAP02M	Former petrol station site on land to west of 185 New Dover Road	Total Reqs: 9 Demand and need for mobile park homes; an extension of the existing successful and popular residential home park; site is an AONB but it detracts from the AONB and SLA designation; previously developed land; well screened; sustainable location; close proximity to M20 and Folkestone Harbour Railway Station; 80 metres from a bus stop.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, the biodiversity interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
CAP02M (IC)		<p>CAP02M would work well in conjunction with development of site SAD01, but as a standalone site would deliver negligible community benefits due to its modest size; will bring further unattractive linear development to Capel.</p> <p>The site lies within open countryside, poorly related to the existing settlement pattern.</p> <p>AONB.</p> <p>Expansion to the existing residential home park for the siting of approx. 20 park homes; unconstrained in terms of flooding; The site is designated as being within the AONB, however as previously developed land, the site offers little in relation to this designation; the site can be accessed from the local highway network; DCLG consider Park Homes to fall within the definition of low cost market housing; located close to a sustainable settlement which has excellent links and good facilities and services.</p>		
CAP02M (IC)		<p>We have no objections to this site in principle. We believe this would be an ideal site for a small number of commercial units and in particular a Doctors Surgery with adjoining Post Office which will support the amenities currently available within the village (Capel le Ferne Parish Council).</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. Archaeological finds from the Capel-le-Ferne area include a Neolithic flint implements, a Roman coin hoard and a Late Roman burial. Works associated with the construction of the former petrol station (such as buried tanks) may have affected the survival of archaeological remains. Development with archaeological measures may be possible on this site (KCC).</p>		
SHL047	Old Dover Road site	<p>Total Reps: 9</p> <p>High quality wooden holiday lodges; site is bounded on all sides with mixed hedging; close to local facilities; close to M20 and Folkestone Harbour Railway Station</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, the biodiversity interests and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL047 (IC)		<p>Poorly related to the village and adjacent to the Folkestone Warren Site of Special Scientific Interest and the Heritage Coast Site.</p> <p>The site within open countryside, poorly related to the existing settlement pattern.</p> <p>Support - The site represents an available and unconstrained site in terms of flooding and is surrounded by development. The site could be accessed from the local highway network independently of any improvements. The site has been proposed for an extension to the existing and established residential home and holiday park. The proposed site allocation is self contained within established landscape boundaries and is not within the AONB. Would inject business into the local economy and bring additional trade to shops and other businesses. The site lies in a sustainable location by virtue of public houses, a MOT garage, a village hall, a primary school and Battle of Britain Memorial.</p>		
SHL047 (IC)		<p>Any development would have a detrimental impact on the Heritage Coast and A.O.N.B (Capel le Ferne Parish Council).</p> <p>Significant archaeology could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. A bowl barrow which contained a secondary cremation of Middle Bronze Age date lies to the east of the site in question. Development with archaeological measures may be possible on this site (KCC).</p>		
LDF014	Land to the west of 9 Cauldham Lane	<p>Total Reps: 10 Site access issues (Capel le Ferne Parish Council)</p> <p>CPRE support the allocation.</p> <p>Footway requirement for possible link to existing (Kent Highway Services).</p> <p>Prehistoric findings nearby. Provision for a programme of archaeological work would be appropriate (KCC Heritage & Conservation)</p> <p>Support.</p> <p>Cauldham Lane is far too narrow; the road is sub standard; site very exposed and highly visible and prominent; edge of village location.</p>	<p>There are now significant concerns regarding this site, which was considered as suitable for development at the Preferred Options stage (March 2008). The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, the biodiversity interests and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF014 (IC)		<p>Loss of light to the rear gardens of Cauldham Lane and Capel Street; Highway safety issues; existing land not capable of handling further traffic; loss of trees; conservation area; road access.</p> <p>Capel le Ferne does not have sufficient facilities to support the proposed growth; no primary health facilities; outdoor sports facilities; retail facilities and the Post Office has recently closed. The access to Little Cauldham Farm via Cauldham Lane is functional only for one way traffic; a significant increase in traffic may pose a risk to parents and children when leaving the school; bus route only operates into the main towns of Folkestone and Dover; area used extensively by dog walkers and the removal of the public footpath through the field would remove this use; no footpath.</p> <p>The site has previously had a covenant placed upon it that it will never be built upon; the land has been contaminated by burial of restricted waste.</p>	<p>Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.</p>	
LDF015	Land to the south of New Dover Road between Capel court Caravan Park and	<p>Total Reps: 10 Support</p> <p>Inappropriate to divide the site as proposed; the whole site should be managed for its landscape and biodiversity interest (CPRE).</p> <p>The openness and rural setting on approach to the village will be clearly affected; The proposed high density development will be detrimental to the present rural character of the village; AONB; high incidence of mist in Capel-le-Ferne this will impose additional dangers on an already dangerous stretch of road; The mature and developing trees should not be destroyed; lack of village facilities; development would increase the amount of traffic, congestion and noise pollution; amenity of residents affected by the development must be protected; buildings must be low rise</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF015		<p>Welcome the provision of the improvement to the chalk grassland on the southern part of the site. This will improve biodiversity and help towards the UK BAP target for this habitat (Natural England).</p> <p>Foul sewer capacity assessments have indicated that there is capacity available to accommodate the proposed development (Southern Water).</p> <p>Due to the general potential for prehistoric remains in this area provision for a programme of archaeological works would be appropriate (KCC Heritage & Conservation).</p> <p>The site is totally overgrown and reverting to native woodland; national importance for biodiversity; on the edge of the village; scheme offers no community benefits; poor connectivity with the existing village and its services.</p> <p>Proposed exit is on a very dangerous bend; village amenities are not enough to support 50 more dwellings (no doctors' surgery, school is full, post office closed); site is home to endangered species such as orchids, lizards and toads.</p>	<p>An appraisal of the site (LDF015) has revealed that little has altered since the Local Plan Inquiry and that development could have an adverse impact on GI, the setting of the AONB and Heritage Coast. Having reviewed all the sites submitted for consideration in Capel, and taking into account of the representations received from the Parish Council, the site is considered to be suitable for development to reflect Capel's role as a Local Centre.</p>	
LDF015		<p>Implementation of the development post 2012 will enable any issues to be comprehensively addressed.</p>		
SHL060	Land between 107 & 127 Capel Street	<p>Total Reps: 58</p> <p>This site could bring community benefits to Capel at the same time as resolving the parking problems and congestion at the school gates (Capel le Ferne Parish Council).</p> <p>Open grassland with residential development to the north and south; does not lie within AONB; would rationalise village confines; sustainability benefits.</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. A green buffer will be required between the built form and the boundary with the AONB.</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL060 (IC)		<p>Infill.</p> <p>This field is always at least 50% under water whenever there is significant rainfall. The house opposite the entrance to this field has flooded in the past with water flooding from this field.</p> <p>Whilst well related to the primary school development of this site will increase traffic flows along Capel Street.</p> <p>Will have significant detrimental effects on the environment and the local community. The village infrastructure can not support the increased number of cars. Dangerous traffic congestion.</p> <p>Primary health care facilities are not available, single village shop, post office facility was shut last year, local primary school is very small, would need considerable investment by the various utility providers; road access is poor; greenfield; grade II agricultural land; AONB.</p>		
SHL060 (IC)		<p>Development of this site would erode significant gap within the street frontage and the resultant development would be out of keeping with the character of the area.</p> <p>Support - Easily accessible while maintaining minimal disruption to the local area and statutory services.</p> <p>Well located to the centre of the village close to the school; adjoins the highway at a point where sight lines for leaving the site could be well developed; any widening of the main road could be included in the development; could include much needed social housing.</p> <p>Capel Street is inadequate for the parking of so many additional vehicles.</p> <p>Smaller area should be considered for development before building on larger agricultural areas.</p>		
SHL060 (IC)		<p>Capel le Ferne is not accessible by a train service. Children would have to travel to alternative primary and secondary schools outside of the village and by car so there would be very little natural integration of the new families into the life of the village. AONB and used by many villagers and tourists for recreation and walking dogs, and building here would diminish both the striking view into the centre of the village from the North Downs and be prominent from most angles within the village.</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL060 (IC)		We have no objections to this site in principle as this would connect the bottom end of the village, but disagree with your indication of 48 houses on this site which is excessive. This would be an opportunity to improve the highway conditions within the vicinity around the village school. We believe conditions could be imposed for a drop off lay-by for the school, appropriate footpaths and traffic movements onto Capel Street would need to be considered carefully. We also believe this area would be an ideal opportunity for social housing which should be connected to families or residents of Capel-le-Ferne. (Capel le Ferne Parish Council)		
SHL060 (IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. The line of the Roman road between Folkestone and Dover is projected to run through or close to the site in question. Development with archaeological measures may be possible on this site (KCC). Development would integrate will into the surrounding area.		
CAP03	Land to the north of the junction of Capel Street and Winehouse Lane	Total Reps: 3 Footway requirement for possible link to existing (Kent Highway Services). Beyond the village confine; would seem to further accentuate linear development.	The issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.	The site is considered suitable for development and should be allocated in the pre-submission local plan.
SHL084	38 Caudham Lane	Total Reps: 64 Would extend existing housing with little adverse visual impact. A safe access could be provided. The site is close to village facilities; previously developed land.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL084 (IC)		<p>Loss of light to the rear gardens of Cauldham Lane and Capel Street; Highway safety issues; existing land not capable of handling further traffic; loss of trees; conservation area; road access.</p> <p>Would exacerbate traffic problems on Cauldham Lane.</p> <p>Primary health care facilities are not available; single village shop; post office was shut last year; local primary school is very small; local infrastructure would not support additional housing; road access is poor; greenfield; Grade 2 agricultural land; AONB.</p> <p>Noise pollution; trees and wildlife would suffer; children would lose the freedom of being able to play in safety.</p> <p>The site is poorly related to the main part of the settlement and most of the services and facilities. The development of the site would result in the extension of ribbon development up to the boundary of the AONB.</p>	Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.	
SHL084 (IC)		<p>The development would be highly visible when viewed from the surrounding areas; it is on AONB and used by many villagers and tourists for recreation and walking dogs, and building here would diminish both the striking view into the centre of the village from the North Downs and be prominent from most angles within the village.</p> <p>We have no objections to this site in principle, but would suggest if SHL060 is not suitable, this could also be an ideal opportunity for social housing which should be connected to families or residents of Capel-le-Ferne (Capel le Ferne Parish Council).</p>		
SHL084 (IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. The line of the Roman road between Folkestone and Dover is projected to run to the west of the site and an Anglo-Saxon brooch has been found in an adjacent field. Development with archaeological measures may be possible on this site (KCC).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL085	Longships, 9 Cauldham Lane	Total Reps: 80 This is a residential property with land sufficient for other dwellings, suitable for future development.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SHL085 (IC)		Capel le Ferne does not have sufficient facilities to support the proposed growth; no primary health facilities; outdoor sports facilities; retail facilities and the Post Office has recently closed. The access to Little Cauldham Farm via Cauldham Lane is functional only for one way traffic; a significant increase in traffic may pose a risk to parents and children when leaving the school; bus route only operates into the main towns of Folkestone and Dover; area used extensively by dog walkers and the removal of the public footpath through the field would remove this use; no footpath. Would exacerbate traffic problems on Cauldham Lane. Noise pollution; children would lose the freedom of being able to play. We have no objections to this site in principle, but would comment to Dover District Council previous approval of LDF014 (the adjacent site). We have concerns over the road width, passing locations, traffic movements and congestion at Capel Street and B2011. We would also like to draw your attention that site LDF 014 has an asbestos building and a number of horses buried on the site (Capel le Ferne PC).	Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.	
SHL085 (IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. The line of the Roman road between Folkestone and Dover is projected to run just to the west of the site and an Anglo-Saxon brooch has been found in an adjacent field. Development with archaeological measures may be possible on this site (KCC).		
SAD02	Land to the north of New Dover Road	Total reps: 7 Infilling plot; immediately adjoins the existing village confines; within the AONB and SLA	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, wider landscape impact and the setting of Capel.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD02 (IC)		<p>Would impact negatively on the Battle of Britain Museum.</p> <p>The site is poorly related to the settlement pattern and would constitute 'ribbon development'.</p> <p>Allocating areas for large numbers of housing in the AONB around Capel-le Feme would change the character of this community which is within and on the boundary of the AONB. There would seem no justification or need to develop in the AONB in the following sites all of which are within the AONB boundary: All would have a major impact on the AONB and create unacceptable visitor pressure on the AONB. SH091 - on edge of AONB boundary overlooked from all sides. Very large development of 186 homes SAD01 in AONB very large development of 215 homes CAP02M in AONB large development SAD02 in the AONB large development. The following sites on and very near the boundary of the AONB are also very sensitive; other nearby or adjacent sites have been excluded. There</p>	<p>Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.</p>	
SAD02 (IC)		<p>seems no justification for inclusion. SHL085 AONB boundary to the west SHL060 Surrounded on west by AONB boundary SHL 047 and NS01 CAP-AONB boundary to the south The AONB unit would not be averse to minor infill and extensions if carefully achieved and designed and which are in response to local need and fit with AONB management Plan Policies. The allocations suggested however do not fit these criteria (Kent Downs AONB).</p>		
SHL091	Land at Little Cauldham Farm	<p>Total reps: 78</p> <p>Screened from distant views; site lies outside the AONB designation; would enable the development to provide significant community resources and facilities; Access will have to be derived from a new junction off Capel Street; The loss of any houses in such a location would be minimal; no biodiversity issues at all; There is proposal being worked up for a combined heat and power facility based at Great Cauldham Farm which adjoins the site and is in common ownership.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

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Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL091 (IC)		<p>Capel le Ferne does not have sufficient facilities to support the proposed growth; no primary health facilities; outdoor sports facilities; retail facilities and the Post Office has recently closed. The access to Little Cauldham Farm via Cauldham Lane is functional only for one way traffic; a significant increase in traffic may pose a risk to parents and children when leaving the school; bus route only operates into the main towns of Folkestone and Dover; area used extensively by dog walkers and the removal of the public footpath through the field would remove this use; no footpath.</p> <p>Well related to the centre of Capel; close to the primary school; The most logical access into the site would be via Capel Street and the landowners have indicated that they will purchase properties along the southern part of Capel Street in order to provide access to the site; outside the AONB; within Groundwater Source Protection Zone.</p>	Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.	
SHL091 (IC)		<p>The site is a large site and the scale of growth proposed is not considered to be inappropriate for the village given its role and position within the District's settlement hierarchy.</p> <p>No primary health facilities; post office has recently been closed; roads and access routes will be unable to support such an increase in traffic.</p> <p>The access to Little Cauldham Farm via Cauldham lane is functional only for one way traffic; rural village not suited to large volumes of traffic; there has always been a problem with water pressure in the area; it is not unknown for areas of the field to gather water and flood in times of heavy rain; this area is used extensively by dog walkers and the removal of the public footpath through the field would remove this use; no footpath.</p>		
SHL091 (IC)		<p>Noise pollution; children would lose the freedom of being able to play in safety.</p> <p>The scale of development proposed (186 dwellings) would be out of keeping with the scale of the existing settlement of Capel Le Feme and constitute a significant 'urban extension' into the surrounding countryside.</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL091 (IC)		This site is totally out of proportion with the existing size and settlement of the village and will significantly alter the character and have a serious detrimental impact on the Parish. Serious infrastructure issues exist and it is evident that no acceptable access to this site is practicable. Access from Cauldham Lane is totally inappropriate in terms of road width and footpath provisions. Access from Capel Street is not provided. Capel Street currently has issues with speeding and congestion, further bottlenecking at the junction of Capel Street / B2011 will be significant and extremely dangerous. The infrastructure is totally inappropriate. This		
SHL091 (IC)		area has a flooding issue and even though the current area is agricultural, discharge and run off can be significant into Capel Street during heavy rain. As you will be aware this has caused flooding of properties in Capel Street over the past few years. This land needs to remain in its current form. Capel le Feme does not have the appropriate infrastructure to support such a development. For example the local Primary School is already at capacity and unlikely to be able to support the additional education requirements that would be required. This would increase traffic circulation to schools outside the village and new residents will therefore not integrate with the existing village. This site is also a flight path and stop off for birds such as swifts, swallows and other migrating birds. The close knit community feel of the village would never be the same again and would alter one of the main reasons for settlement within the Parish in the first place (Capel le Ferne Parish Council).		
SHL091 (IC)		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. The line of the Roman road between Folkestone and Dover is projected to run just to the west of the site and an Anglo-Saxon brooch has been found in an adjacent field. Development with archaeological measures may be possible on this site.		
SAD01	Land to the north of New Dover Road	Total reps: 57 AONB; existing access of Beatrice Road; the biodiversity of this site is minimal as it is open farmland.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, wider landscape impact and Green Infrastructure requirements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD01 (IC)		<p>Insufficient infrastructure in the village; loss of wildlife; dangerous corner on B2011 where proposed entrance will be.</p> <p>Primary health care facilities are not available; Post office shut last year; local primary school is very small; water supply is tenuous; road access is poor; detrimental effect on the AONB; fundamentally change the character of the village.</p> <p>Grade 2 agricultural land; greenfield.</p> <p>The scale of development proposed (215 dwellings) would be out of keeping with the character of the settlement of Capel le Feme and constitute a significant 'urban extension' into the surrounding countryside, poorly related to the existing settlement pattern.</p> <p>Well related to Capel in offering a logical extension to the village. Access to the site would be via its lengthy frontage to the New Dover Road. Well related to community facilities - Green Lane, a bridleway connects the site directly to the primary school and the playing fields next to the village hall and shop.</p>	<p>Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.</p>	
SAD01 (IC)		<p>Would exacerbate traffic problems on Cauldham Lane.</p> <p>Site is totally out of proportion with the existing size and settlement of the village and will significantly alter the character and have a serious detrimental impact on the Parish. The resulting increase in traffic circulation would create more danger on the B2011 through the centre of the village; significant Public Rights of Way; significant drainage pipeline known as Folkestone Transfer which collects effluent from Folkestone and is transferred to Southern Water's Broomfield Bank Wastewater Treatment Works; local Primary School is already at capacity; This would increase traffic circulation to schools outside the village and new residents will therefore not integrate with the existing village (Capel le Ferne Parish Council).</p>		
SAD01 (IC)		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from within the site itself. The site however lies in an area of general archaeological potential particularly for remains of prehistoric or Romano-British date. Archaeological finds from the Capel-le-Ferne area include a Neolithic flint implements, a Roman coin hoard and a Late Roman burial. The line of the Roman road between Folkestone and Dover is projected to run to the north of the site. Development with archaeological measures may be possible on this site.</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01CAP (IC)	Intersection of Old Dover Road and New Dover Road, Capel le Ferne	<p>Total reps: 8</p> <p>Lies within open countryside, poorly related to the existing settlement pattern</p> <p>Some distance from the various services and facilities within the village.</p> <p>The village infrastructure is not designed for many more extra people, with only one shop, a school not large enough to cope with the inevitable extra children, also now lacking a post office, doctors and dentists surgeries and chemist.</p> <p>Not acceptable for development. Any development of this land would have a detrimental impact on the AONB and the Heritage Coast (Capel le Ferne Parish Council).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, Heritage Coast and Green Infrastructure. Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Capel.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
NS01CAP (IC)		<p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible to Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies opposite a bowl barrow which lies on the southern side of the Old Dover Road. At least two secondary cremations have been recovered from the mound, one of which has been dated to the Mid Bronze Age. It is possible that remains associated with the barrow, potentially including later Anglo-Saxon graves focussed on the earlier monument, could extend into the site in question. Development with archaeological measures may be possible on this site.</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL075	Land to the rear of properties on Church Road, Coldred	<p>Total reps: 13</p> <p>The hamlet centres around a small green; The properties are severely affected by road noise from the A2; additional tree planting; the fields can be landscaped further with orchard trees to be grazed under in the traditional fashion; A secondary cordon of lower level trees could be planted around the village core; new access to the rear of the green; Coldred could become an 'Eco'Hamlet'; the public house is only occasionally open but with larger numbers in the community it could be supported economically; there might be opportunities for the farm to diversify its business.</p> <p>Would provide a natural rounding off of the built environment; would not conflict with sustainability objectives.</p>	The site is located within a hamlet. Policy CP1 of the Core Strategy states that hamlets are not suitable for further development unless it functionally requires a rural location.	The site is not considered suitable for development and should not be allocated in the pre-submission local plan.
SHL075 (IC)		<p>In this current economic environment it is very important to allow minor development to create work and meet the housing needs of the area. This can only have a positive impact on the community.</p> <p>This should relate only to the site "land opposite the Conifers, Coldred", which is deliverable; the site is within the un-built confines; the site is available for immediate progression; has no environmental issues; no flood risk; the site is the best tie-in location in the village for the connection of all utilities; no infrastructure works or enlargement off-site would be required. Coldred is very conveniently situated between Aylesham Industrial Centre, Pike Road and Dover Enterprise Zone. As well as Dover and Canterbury; the village has direct connection to the road transport system (A2); on a local bus route; 1.2 miles from the railway station; small development which would integrate and not disturb the open distribution of the built confines.</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL075 (IC)		<p>Coldred is well placed to serve commerce and industry in and around Dover.</p> <p>We are the owners of the land at Briarlea, Coldred and have not intention of offering it for future development, please remove it from the proposal plan.</p> <p>If this site is delivered it will put yet further pressure from another direction on the European site network being only around 550m away from Lydden & Temple Ewell Downs SAC. With the development currently planned within the WUE Kent Wildlife Trust recommends that this site is excluded from the Site Allocations. If consideration is given to this site individual and in-combination impacts on the SAC will need to be assessed (KWT)</p>		
SHL075 (IC)		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from the site itself, however there are a number of cropmarks in the fields to the north of the village (including ring-ditches, track-ways and enclosures) which suggest a general background potential for prehistoric and Romano-British remains. In addition possible medieval cremations have been recorded just to the south-east of the site. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 1 We have no objection to either of the sites being developed within East Langdon. They appear to contain intensive agricultural land. Consideration should be given to the presence of reptiles within any detailed planning application (Kent Wildlife Trust).	Noted.	Noted.
SHL035	Site north of Langdon Primary School	Total reps: 4 Loss of trees and local amenity value; impact on landscape (CPRE) The site would be an unacceptable extension beyond the existing confines on higher ground; Access is poor; add to the congestion of parked cars; 10 units would not address the need for affordable housing (Langdon Parish Council). Access roads are inadequate for lorries; parking problems at school times; loss of wildlife. Noise levels, height of houses, more cars through the village, lower house prices, lack of school spaces.	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. The protection of boundary features (scrub/trees) and appropriate landscaping will reduce any detrimental impact on the wider landscape.
SHL044	Site at Langdon Court Farm	Total reps: 10 The site is well located in terms of strengthening existing village patterns; the village contains a village hall, post office, and outdoor sports facilities, located to the north-east; proposed access to the site from the existing access of The Street for Langdon Court Farm is appropriate for an increased number of vehicles and allows for safe ingress and egress to the road; would not adversely affect any listed buildings and would represent a natural expansion of the village; Special Landscape Area; could facilitate an opportunity for open space, off-site public open space, and education and highway improvements in required; performs well against sustainability criteria; within a Conservation Area.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the Listed Buildings and Conservation Area, wider landscape impact and problematic access arrangements. Any development of the site would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL044 (IC)		<p>Only small incremental expansion of the village should be considered; lack of pavements in the village; single track roads with few passing places; lack of spare spaces in the school; remoteness of any GP facility; lack of mains gas supply. Do not want to see a reduction of agricultural activity (Langdon Parish Council).</p> <p>Adversely impact on the rural character; negative impact on the environment; no benefit to the local community; neither the roads nor the infrastructure is sufficient to support such a large urban development.</p> <p>Will double the number of properties in the village; significantly increases the traffic on the country lanes.</p> <p>Not in keeping with the character of the village.</p> <p>Conservation area.</p> <p>The Trust has no objection to development within this site as it appears to be previously developed. There is a fragmented around the boundary which should be retained, restored and buffered within the build (KWT).</p>		
SHL044 (IC)		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The village of East Langdon is surrounded by a number of cropmarks which show evidence for buried archaeological remains and landscapes in the surrounding fields. Ring ditches, representing the ploughed-out remains of prehistoric burial mounds, can be seen to the north, east and south of the site. In addition the buildings of Langdon Court Farm are shown on the first edition Ordnance Survey map and may be of local heritage interest. Development with archaeological measures may be possible on this site (KWT).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL086 (IC)	Land adjacent to Langdon Court Bungalow, The Street, East Langdon	<p>Total reps: 10</p> <p>We have no objection in principle to the development of these sites. There is currently a fragmented boundary hedgerow network which appears relatively complete along the NE boundary of SHL086. All hedgerows should be retained, repaired, strengthened, connected and buffered to retain protect the hedgerow and woodland network within the immediate area. The site also contains what appears to be mature woodland. This should be retained within the development as it comprises an integral part of a relatively well connected hedgerow and copse network within the immediate area (KWT).</p> <p>Only small incremental expansion of the village should be considered; lack of pavements in the village; single track roads with few passing places; lack of spare spaces in the school; remoteness of any GP facility; lack of mains gas supply (Langdon Parish Council).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of East Langdon, wider landscape impact and green infrastructure requirements. Other issues raised through consultation are not site specific issues; the issues relate to the general principle of development in East Langdon.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
SHL086 (IC)		<p>Adversely impact on the rural character; negative impact on the environment; no benefit to the local community; neither the roads nor the infrastructure is sufficient to support such a large urban development.</p> <p>Will double the number of properties in the village; significantly increases the traffic on the country lanes.</p> <p>Roads are too narrow.</p> <p>It is not considered that development of this scale is appropriate for a village of this size with such limited services and facilities and given the village's role and position within the District's settlement hierarchy</p>		
SHL086 (IC)		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The village of East Langdon is surrounded by a number of cropmarks which show evidence for buried archaeological remains and landscapes in the surrounding fields. Nearby cropmarks include ring-ditches and track-ways. Development with archaeological measures may be possible on this site (KWT).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 3 Tipping point for current services in Whitfield at 245 residents/100 units Would require extended opening to provide additional access to services. Need to consider impact of Whitfield Expansion plan on site also as tipping point will be reached earlier (NHS Eastern and Coastal Kent).	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
LDF041 (IC)	East Studdal Nursery, Downs Road, East Studdal	Total reps: 7 Brownfield site. Support development but only to a maximum of 10 (Sutton Parish Council).	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. The protection of boundary features (hedgerow/trees) and appropriate landscaping will reduce any detrimental impact on the wider landscape.
LDF041	East Studdal Nursery, Downs Road, East Studdal	CPRE Support. The number of houses on this site should be no more than 10. Please refer to the Village Design Statement (submitted for adoption) and policy SPDS 7 which requires that existing street patterns should be respected and estate type development should be avoided. Whilst the Council has no objection to the site itself, they must object to the proposal based on the number of houses suggested (Sutton by Dover Parish Council). Cannot comment on the foul sewerage capacity to accommodate development at East Studdal Nursery as it is 2.7 km to nearest sewer. It might be connected to private treatment plant (Southern Water). Site footway link therefore access issues (Kent Highway Services). Aerial photography shows that the site lies within a landscape which is rich in archaeological remains. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation).		
SHL005 (IC)	Land south west of Fieldings, Stoneheap Road, East Studdal	Total reps: 6 This site appears from aerial photographs to contain a strong hedgerow around the boundary of the site. This should be preserved, strengthened and buffered within the development. We have no objection to any other site identified being developed. They appear to contain intensive agricultural land. Consideration should be given to the presence of reptiles within any detailed planning application (KWT).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of East Studdal and the wider landscape impact. Any development of the site would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL005		The site is currently in use as an overnight coach park and repair station and it has been in such industrial use for the past fifty years; The site is outside the village envelope of East Studdal, but not by any great distance; There are a number of residences along the road, development would not be out of keeping; Suitable residential development would be less of a visual intrusion into the landscape than the current use which the site enjoys.		
SHL009 (IC)		Total reps: 3 Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The fields surrounding the village of East Studdal are exceptionally rich in cropmarks. These cropmarks show enclosures, track-ways and field-systems as well as ring-ditches. A track-way and two large ring-ditches lie just outside and to the south of the site in question. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of East Studdal and the wider landscape impact. Any development of the site would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SHL009	Land off Downs Road, East Studdal	When Downs Road was built some 30-40 years ago part of an access road into the site was prepared.		
SHLO16 (IC)	Land to the south of Downs Road, East Studdal	Total reps: 6 Support - we have the support of a housing association for this site; would provide a physical definition to the boundary of the village. Detrimental landscape impact. Development will result in a significant incursion into the countryside. The settlement has a limited range of services and facilities. Sutton Parish Council object. Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The fields surrounding the village of East Studdal are exceptionally rich in cropmarks. These cropmarks show enclosures, track-ways and field-systems as well as ring-ditches. A section of a substantial trackway and part of an annular enclosure extend into the southernmost part of the site. Development should be avoided on the southern-most part of the site. Pre-determination evaluation would be necessary to determine whether development is possible within the remaining part of the site (KCC).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of East Studdal and the wider landscape impact. Any development of the site would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL016		The village has a store, off licence, a small chapel, a new Community Centre and is connected to Dover, Deal and Sandwich via a local bus service. It is evident that more accommodation is required both for the retired population and the younger element who if they cannot afford to purchase an existing dwelling will move away from the village.		
SHL017 (IC)	Land to the south of Downs Road, East Studdal (The Follies)	Total reps: 4 Detrimental landscape impact. The site's development will result in a significant incursion into the countryside. The settlement has a limited range of services and facilities. Sutton Parish Council object. Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The fields surrounding the village of East Studdal are exceptionally rich in cropmarks. These cropmarks show enclosures, track-ways and field-systems as well as ring-ditches. A section of a substantial trackway and part of a large ring-ditch lie to the south/south-west of the site. Pre-determination evaluation would be necessary to determine whether development is possible within site (KCC).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of East Studdal and the wider landscape impact. Any development of the site would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SHL017	Land to the south of Downs Road, East Studdal (The Follies)	East Studdal is identified as a village; the site is located close to existing facilities in the village; previously developed land; The site is not contaminated and is not dependent on the provision of extensive on or off site infrastructure before it can be developed; The site will ensure the continued use of existing facilities.		

East Studdal

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS03SUT (IC)	Homestead Lane, East Studdal	<p>Total reps: 5</p> <p>This small scale development is suitable for the village.</p> <p>Infill.</p> <p>Will disturb wildlife; Homestead Lane is very narrow at this point; no amenities in the village.</p> <p>Development on this site fits in with the Parish Design Statement; The village confines would need only a small extension to incorporate this site. The Parish Council would not oppose development based on the assumption that we must find some development land and this site seems to be the least controversial (Sutton Parish Council).</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The fields surrounding the village of East Studdal are exceptionally rich in cropmarks. These cropmarks show enclosures, track-ways and field-systems as well as ring-ditches. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be considered as an amendment to the settlement confines (as the capacity of the site is for fewer than 5 dwellings).</p>
NS04SUT?				
Total reps: 3				

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Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	<p>Total reps: 1</p> <p>There are a number of sites in the south of the district that could either individually or in combination have the potential to adversely impact the safety/operation of the trunk road network, for example: Capel-le-ferne (SAD01 and SHL091) and West Hougham (NS01HOU) are located close to the A20 and Elvington & Eythorne (SHL088, SHL089 and NS01EYT); St Margarets at Cliffe & Bay (SHL073 and SAD28); and Shepherdswell (SHL075) are located close to the A2. As with the sites identified in other areas of the district if any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. We would expect to see mitigation measures put forward, as appropriate, to address any identified impact on the A20 and A2. These might include modal shift measures, such as contributions to improved public transport (Highways Agency).</p>	<p>KCC Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.</p>	Noted
All Sites	Interim Consultation	<p>Long term capacity would need to be provided by the Shepherdswell site (NHS Eastern and Coastal Kent)</p>	<p>The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.</p>	Noted
LDF011	Land to the east of Monkton Court Lane	<p>Total reps: 135</p> <p>Flood risk to existing properties on Monkton Court Lane and The Green.</p> <p>The proposed development would intrude into an area of attractive open hillside and be totally out of keeping with the topography of the area; Monkton Court Lane is barely wide enough for two cars to pass safely; there is no general practitioner or dentist in the village.</p> <p>The current infrastructure is woefully inadequate; parts of The Street have no pathways, overhead powerlines still exist; destroying green belt land.</p> <p>Prime agricultural land; serious lack of drinking water with frequent hosepipe bans; the country lanes of Eythorne are already inadequate; Barville Road is unsuitable for the considerable number of lorries that it carries; there is only one shop; Eythorne is situated in an area of high unemployment.</p>	<p>LDF011 lies on the edge of the existing built development; there is no natural boundary to the east. The site currently provides a soft edge to the village. Development of the site could have an adverse impact on the setting of the village, unless considerable care was taken with landscaping.</p> <p>The LDF PAG have concluded that the impact on the setting of the village, and on the wider landscape, would be significantly greater with the development of LDF011. Subject to further investigation of the access arrangements, LDF01 is recommended for allocation.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF011		<p>Monkton Court Lane and Kennel Hill will surely need to be widened and improved.</p> <p>Building outside the village confines; should be considered totally inappropriate, given the nature of the Inspector's Report of June 2001.</p> <p>The use of non-porous materials at this site, will lead to further problems, in relation to flooding. We have one public house and one general store/post office, with nearly all villagers having to travel for their groceries. Parking is an issue; Would put at risk the numerous listed buildings that surround this site (Eythorne Parish Council)</p> <p>High levels of road traffic including lorries (traffic calming needed); Pedestrian / road safety issues; Flood risk; Future water supply; There are few facilities for the young or elderly; No doctors or dentists, no trains and few buses.</p>		
LDF011		<p>Access; Increased traffic along a narrow lane; Flooding.</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at the land east of Monkton Court Lane, Eythorne and land adjacent to Homeside, Eythorne. The developer must requisition a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water (Southern Water).</p> <p>No train service and limited bus service; There is no evidence that more housing is needed in the village.</p> <p>Land represents a valuable green buffer zone.</p> <p>Listed buildings; While the Gas Network at the entrance to this junction will almost certainly need re-siting as may the water pumping station at the other end of the site (Eythorne Parish Council)</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF011		<p>Site outside village confines, irreversible loss of farming land, increase of traffic and strain on resources (man-made and natural), development neither justifiable nor wanted by village.</p> <p>Greenfield site.</p> <p>There are no pavements in The Street; The site has already been turned down for development in the past.</p> <p>Insufficient infrastructure.</p> <p>Extension of village into the open countryside and issues of containment and risk of future development and encroachment into countryside; loss of grade 1 agricultural land; visual intrusion in the landscape; risk of flooding on Monkton Court Lane and the village green as a result of topography and surface run-off; potential traffic issues (CPRE).</p> <p>Foul sewer capacity assessments have indicated that there is no capacity available to accommodate the proposed development on the land east of Monkton Court Lane (Southern Water).</p>		
LDF011		<p>The site lies in an area of general archaeological potential relating to cropmarks seen through aerial photography and Roman remains known to the north of Eythorne. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation)</p>		
LDF01	Land behind Homeside, New Road and 72-80 Sandwich Road, Eythorne	<p>Total reps: 100</p> <p>Prime agricultural land; serious lack of drinking water with frequent hosepipe bans; the country lanes of Eythorne are already inadequate; Barville Road is unsuitable for the considerable number of lorries that it carries; there is only one shop; Eythorne is situated in an area of high unemployment.</p> <p>The only possible access to this site is via Sun Valley Way; DDC have agreed that such access would not be allowed. Therefore, there seems little point in creating a land-locked estate.</p> <p>This land, which is outside the village confines, has been the subject of a previous application which, on appeal, was rejected by the adjudicator. His reason was that the land represents a valuable green buffer zone between the areas between the areas of Upper & Lower Eythorne and should be retained. This situation has not changed; would lead to an unacceptable increase in traffic density; would lead to the loss of part of one of our few remaining heritage sites.</p>	<p>Officers have raised concerns with developing this site as there are complex landownership issues in relation to accessing the site and little has altered (in relation to medium distance views) since the Local Plan Inquiry.</p> <p>The LDF PAG have concluded that the impact on the setting of the village, and on the wider landscape, would be significantly greater with the development of LDF011. Subject to further investigation of the access arrangements, LDF01 is recommended for allocation.</p>	<p>The site is considered suitable for residential development and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF01		<p>Building outside the village confines; should be considered totally inappropriate, given the nature of the Inspector's Report of June 2001.</p> <p>Eythorne has RS II status and as such should have no further housing development.</p> <p>Not in keeping with the character of the village; Concerns of access, increased demands on local services and density of buildings.</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at the land east of Monkton Court Lane, Eythorne and land adjacent to Homeside, Eythorne. The developer must requisition a connection to the sewerage system at the nearest point of adequate capacity, as specified by Southern Water (Southern Water).</p> <p>No train service and limited bus service; There is no evidence that more housing is needed in the village</p>		
LDF01		<p>Sun Valley Way is already congested.</p> <p>We believe that the site is land locked with limited access. It is difficult to see how vehicular access could be provided to the paddock at Homeside. The only viable option seems to be via the gap between two houses on Sandwich Road; but this would necessitate crossing a large area of land which belongs to the owner of the bungalow 'St. Ives' located off New Road. We understand from talking to him that he would not be prepared to give his permission. It would appear therefore that the development of the Paddock would produce a land-locked estate with pedestrian-only access. (Eythorne Parish Council).</p> <p>Could be a small development, perhaps affordable housing.</p> <p>Insufficient infrastructure.</p> <p>Coalescence of upper and lower Eythorne; loss of trees and local amenity value; impact on landscape (CPRE).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
LDF01		<p>Under Kent Design current standards the number of dwellings would be restricted to 25 as 25 are already served of the one access. This would allow 50 the maximum accepted off a cul-de-sac. Therefore access is an identified issue (Kent Highway Services).</p> <p>The site lies in an area of general archaeological potential relating to cropmarks seen through aerial photography and Roman remains known to the north of Eythorne. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation).</p> <p>Is policing adequate for such an increase?</p>		
SHL036	Shepherdswell Road	<p>Total reps: 5</p> <p>The land is well related to the village and associated services; The land is visually well contained; would not be out of character with the village; Established protected trees would also be safeguarded.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village, wider landscape impact and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
SHL036 (IC)	Shepherdswell Road	<p>It is outside the settlement confines; There is a history of severe flooding adjacent to this site (fully documented in Parish records). Kent Highways have tried to alleviate the problem by excavating the old drainage sump that is actually part of SHL036 - but the problem continues; Part of the heavily wooded site is formed by a steep bank into which are cut several caves that were once used for the storage of root crops by local farmers. It is therefore one of the few remaining links with our rural heritage; Access to the site is onto a section of Shepherdswell Road that has poor site lines in both directions. The road is also extremely narrow with a pinch point of only 4.5m between the site and the crossroads at Church Hill (Eythorne Parish Council).</p>		
SHL036 (IC)		<p>The proposed site is close to a crossroads.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies close to the centre of the historic village and used to be part of a garden/orchard adjacent to the Old Rectory. The village itself is surrounded by archaeological remains which show as cropmarks on aerial photographs of the surrounding fields. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL020	Land to the north of Elmton Lane	Total reps: 6 Access issues can be overcome; Elmton Lane performs equally as well if not better than other sites which have been put forward with respect to agricultural land quality and potential impact on a conservation area; visually more contained.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village, wider landscape impact and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SHL020 (IC)		Outside village confines; no pavement on Wigmore Road; Dangerous junction; the pumping station has difficulty in coping with current use; roads too narrow in places. The shale from old mine excavations is likely to be unstable. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies to the north of a Bronze Age barrow cemetery. Other archaeological remains in the form of cropmarks are known from the area and finds of Palaeolithic flintwork and Roman pottery have been found in nearby fields. Development with archaeological measures may be possible on this site (KCC).		
SHL020 (IC)		There is no feasible way of re-drawing the village confines to include this site; isolated from Lower Eythorne; does not have a pavement connection to the rest of the community; Consultations with Kent Highways have concluded that it would not be possible to install such a connecting pavement; the land has a history of flooding; It is bounded by steep, unstable shale deposits from the pit spoil heap; high noise and light pollution from the adjacent factory; Access to/from the site is on to a section of highway that is very narrow and has severely restricted sight lines to both west and east - where the old railway bridge buttress gives rise to a blind bend. Parish Council records show that current residents of Elmton Lane have already stated their concern at the difficult junction; The site is adjacent to Wigmore Wood - one of the few sites of important biodiversity in the parish; Situated over the workings of Tilmanstone Colliery (Eythorne Parish Council).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL040	Land at Coldred Road	Total reps: 6 Land is available and deliverable during the first phase of housing land release during the plan period; There are a number of Local Community Services in Eythorne, the village shop, post office, sports ground and play facilities, public houses, primary school, garage, resource centre and a number of small local businesses; There is achievable access to the site; The site is situated within a Special Landscape Area, although it is submitted that development of this site, in a sensitive manner, would neither harm nor be detrimental to the character and setting of the rural area; Has the potential to improve the nature conservation interests of the area, maintaining existing hedgerows and trees; The site is not within an area liable to flooding; There is no evidence that the site is archaeologically sensitive.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the problematic access arrangements and the pedestrian connectivity to the services and amenities in Eythorne.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SHL040 (IC)		It is outside the settlement confines; in Conservation Area; The only feasible access to the site is onto a very narrow section of Coldred Road that is only wide enough for a single vehicle to the west. The section of road is also prone to the retention of surface water, making it a particular hazard in freezing temperatures (Eythorne Parish Council). Support - the site is well situated close to both the village centre and main residential areas, the public transport network and areas of Public Open Space; the Conservation Area designation does not preclude development of this site, albeit that careful attention to detail would be required. Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The fields surrounding the village of Eythorne are rich in cropmarks. These cropmarks show enclosures, trackways and field-systems as well as ring-ditches. Given the potential of the area it is possible that there may be archaeological remains on the site which might be affected by development. Development with archaeological measure		
SHL088	Land to the east of Adelaide Road, Elvington	Total reps: 6 Presently an overgrown site of little landscape value, would benefit from being redeveloped sympathetically; There are issues with the access to the nearby road which would need to be resolved; The redevelopment of this site would boost the local housing offer. The site is within special landscape area but contributes little in its present overgrown state; The site and access to the road are owned by Dover District Council.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village and wider landscape impact.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL088 (IC)		It is outside the settlement confines; The site consists of Grade 1 Agricultural Land and, as such, makes a significant contribution to the local economy; Any further development in Elvington must be considered in the context of the existing difficulties in access to/from the village. Apart from minor country lanes, there is only one suitable access road - Adelaide Road/Church Hill. This has serious congestion around the village school and is too narrow to permit two-way traffic past parked cars. The exit to Shepherdswell Road/Wigmore Lane at the site of the former White Horse public house is also very difficult due to restricted site lines to the west; The topography would not permit highway access from Terrace Road; The land currently forms a green corridor between the villages of Elvington and Eythorne. The two communities have distinct historic, cultural and socio-economic heritages that would be lost if the two communities were merged; The site is on open rolling downland and any		
SHL088 (IC)		development would have a very negative impact on the visual attractiveness and wildlife habitats of the landscape; The scale of proposed housing is totally out of keeping with the Village. The entire parish has only 973 dwellings. SHL088 together with SHL089 would yield 535 extra dwellings. This would destroy the rural character of the village and put insufferable strain on all elements of the local infrastructure. 8. The site is crossed by High Voltage Overhead Transmission Lines; The topography of the site would lead to serious flooding of the adjacent Tilmanstone Colliery Sports Ground with a possible loss of sports amenities (Eythorne Parish Council).		
SHL088 (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The fields surrounding the village of Elvington are rich in cropmarks. These cropmarks show enclosures, trackways and field-systems as well as ring-ditches. Given the potential of the area it is possible that there may be archaeological remains on the site which might be affected by development. Development with archaeological measures may be possible on this site (KCC).		
SHL063	Sweetbriar Lane, Elvington	Total reps: 6 This site, presently an arable field linking the village with a sports ground, could enhance links between the two. The land is in a special landscape area but could enhance the village's housing offer if sympathetically developed; The area does form a buffer between the village and the sports ground, but the sports ground would itself also provide a barrier against further development of this site. The site is within a special landscape but could enhance the villages housing offer if sympathetically developed; The site and access to the road to both road frontages are owned by Dover District Council.	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL063 (IC)		It is outside the settlement confines; The site has 2 public rights of way crossing/bordering it; The site is designated as a Ground Water Source Protection Zone 2; The site is a Special Landscape area and, having been left uncultivated for some years, has some important chalk downland indicator species; The site is crossed by High Voltage Overhead Transmission Lines; Any further development in Elvington must be considered in the context of the existing difficulties in access to/from the village. Apart from minor country lanes, there is only one suitable access road - Adelaide Road/Church Hill. This has serious congestion around the village school and is too narrow to permit two-way traffic past parked cars. The exit to Shepherdswell Road/Wigmore Lane at the site of the former White Horse public house is also very difficult due to restricted site lines to the west; The road access is off Sweetbriar Lane and is on a narrow bend which is a single lane width with the only passing room a private individual's driveway (Eythorne Parish Council).		
SHL063 (IC)		This site appears on KLIS as neutral grassland and is therefore likely to be unimproved and contain a higher biodiversity than the other sites. If this site is to be developed we recommend that at least part of this habit be retained and enhanced for biodiversity. Ecological surveys should be undertaken to assess the ecological value of the site before planning permission is granted. Areas of tree cover and copses are also present on site and may form an integral part of the biodiversity value. We have no objections to any other site being developed as KLIS records the habitat as improved grassland. Many of the sites appear to contain tree belts which link into the larger copses and ultimately into the ancient woodland habitat. These features should be protected strengthened and buffered within the development design. Consideration should be given to the presence of reptiles within any detailed planning application (KWT).		
SHL063 (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Cropmarks immediately to the north of the site in question appear to show an area of substantial interlinked enclosures, possibly a settlement, with connecting track-ways and field-systems. It is possible that associated remains extend into the site in question. The site was previously the location for a sewerage works and this may have had a localised impact on archaeological survival. Development with archaeological measures may be possible on this site (KCC).		
SHL089	Land to the west of Adelaide Road, Elvington	Total reps: 6 The site is a large arable field on the edge of Elvington currently occupied by a farmer on a Farm Business Tenancy, thus vacant possession can be easily achieved; The site is within a special landscape area but a sympathetic development could enhance the area; The site and access to the road are owned by Dover District Council.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village and wider landscape impact.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL089 (IC)		It is outside the settlement confines; The site consists of Grade 1 Agricultural Land and, as such, makes a significant contribution to the local economy; Any further development in Elvington must be considered in the context of the existing difficulties in access to/from the village. Apart from minor country lanes, there is only one suitable access road - Adelaide Road/Church Hill. This has serious congestion around the village school and is too narrow to permit two-way traffic past parked cars. The exit to Shepherdswell Road/Wigmore Lane at the site of the former White Horse public house is also very difficult due to restricted site lines to the west; The topography would not permit highway access from Terrace Road; The land currently forms a green corridor between the villages of Elvington and Eythorne. The two communities have distinct historic, cultural and socio-economic heritages that would be lost if the two communities were merged; The site is on open rolling downland and any		
SHL089 (IC)		development would have a very negative impact on the visual attractiveness and wildlife habitats of the landscape; The scale of proposed housing is totally out of keeping with the Village. The entire parish has only 973 dwellings. SHL088 together with SHL089 would yield 535 extra dwellings. This would destroy the rural character of the village and put insufferable strain on all elements of the local infrastructure. 8. The site is crossed by High Voltage Overhead Transmission Lines; The topography of the site would lead to serious flooding of the adjacent Tilmanstone Colliery Sports Ground with a possible loss of sports amenities (Eythorne Parish Council).		
SHL089 (IC)		Scale 1 Development of this site (or part of) should be avoided to Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Crop marks within the northern/western part of the site show clear evidence for an enclosure, track-ways and a ring-ditch. There are further extensive cropmarks immediately to the west of the site in question. No archaeological remains are known from the southern part of the site, although based on the surrounding area this part is likely to have a high archaeological potential. Development should be avoided on parts of the site where significant cropmark concentrations lie. Development with archaeological measures may be possible on the southern part of the site (KCC).		
SHL051	Land at Shooter's Hill, Eythorne	Total reps: 4 The northern part of the site is presently used for grazing horses, but is capable of being vacated on a minimum of 1 years' notice; Meadow Way has a hammerhead that could provide an alternative road access for all or part of this site; Initial discussion held with Kent Highway Services have identified issues with the curved frontage, the height of the bank and lack of public footpaths on that side of the road, but none of these issues are considered to be major obstacles; The site and access to the Shooters Hill are owned by Dover District Council.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village, adjacent Listed Building and the problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL051 (IC)		<p>Outside the settlement confines; The site is totally land-locked and currently there is no feasible access to the public highway; The land forms part of the green corridor between Upper and Lower Eythorne. In an earlier Government Inspector report (2001) on the suitability of adjacent land for development it was emphasised that the integrity of this 'green wedge' must be retained; The majority of the site consists of a green field that has never been subject to development (Eythorne Parish Council).</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The fields surrounding the village of Eythorne are rich in cropmarks. These cropmarks show enclosures, trackways and field-systems as well as ring-ditches. Given the potential of the area it is possible that there may be archaeological remains on the site which might be affected by development. Development with archaeological measures may be possible on this site (KCC)</p>		
EYT01E	Extension to Tilmanstone Spoil Tip	Commercial development of the spoil tip would be welcomed particularly if it brought 'High Skill Level' employment to the district. Development would need to take into account the already poor status of the road from the development site to the A256 and measures would be needed to prevent heavy commercial traffic from using rural roads.	The Employment Update concluded that the site's location is not considered sustainable employment uses.	The site is considered unsuitable for development and should not be allocated in the pre-submission local plan
NS01TIL (IC)	Land off Barville Road, Tilmanstone	<p>Total reps: 3</p> <p>It is outside the settlement confines and does not functionally require such a location; An industrial development of such scale contradicts the provisions of CP 1; It is adjacent to the hamlet of Tilmanstone; Some units on the adjacent industrial/office development of the former Tilmanstone colliery site are still unoccupied more than 7 years after completion. Of the industrial units that have been let, three of the major ones are no longer operating. The economic viability of such a location for further development must therefore be subject to serious misgivings; The area suffers from drainage and sewerage problems; Barville Road is now the only major route in to/out of the Parish and, as such, bears an enormous amount of traffic. The design and layout of the existing road is completely inadequate for the existing volume of traffic as well as being inadequate for the HGV traffic accessing the existing site. Any further industrial/retail development would necessitate large scale infrastructure investment (Eythorne Parish Council).</p>	The Employment Update concluded that the site's location is not considered sustainable employment uses.	The site is considered unsuitable for development and should not be allocated in the pre-submission local plan

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Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01TIL (IC)		Scale 1 Development of this site (or part of) should be avoided to Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The area to the north and east of the site are rich in cropmarks which show evidence for buried archaeological remains and landscapes. Within the site itself one complete and one partial ring-ditch is visible indicating the presence of a ploughed-out burial mound. Development should be avoided on parts of the site where significant cropmark concentrations lie. Development with archaeological measures may be possible on the southern part of the site (KCC).		
NS01TIL (IC)		There is already a large area on the other side of Pike Road allocated for industrial. Why bring the industrial area closer to houses in Pike Road and the hamlet of Tilmanstone? Many existing units have never been let and even more units are now empty due to the recession. With the development of Whitfield and the White Cliffs business park over the coming years, units in a rural setting would surely be less desirable than those at Whitfield. Barville Road needs to be upgraded before any industrial development. Pike Road narrows at the point where access to the site would need to be. When development first occurred there was a stipulation that the build had to be at low level. Therefore Tilmanstone Salads and the brickworks were 'dug out'. For some reason later development was allowed to be built at high level thus making the industrial site visibly unattractive and noisy at times. This proposed new site would further reduce the attractiveness of the countryside and possibly increase the noise levels to the surrounding houses and hamlet of Tilmanstone. The land is adjacent to a hamlet (Tilmanstone Parish Council		
NS01TIL (IC)		This site is adjacent to an ancient woodland shaw. This feature should be buffered within the design of the development with the buffer being at least 20m in width (KWT).		

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Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01EYT (IC)	Land off Kennel Hill, Eythorne	Total reps: 9 It is outside the settlement confines; The site is on open rolling downland and any development would be totally out of keeping with the topography of the area; The site consists of Grade 1 Agricultural Land and, as such, makes a significant contribution to the local economy; Monkton Court Lane is already subject to serious flooding (fully documented in Parish archives). Any building on this green field site would hamper water soak away and, without major infrastructure improvement, exacerbate the existing flood risk; Access to/from the site would, presumably, be on to Kennel Hill; The highway infrastructure would need a complete re-design as there would be a significant volume of traffic that would need to go through the existing village due to the closure of the A256 turn offs; The scale of proposed housing is totally out of keeping with the Village status as defined by CP 1. The proposed area of development equates to approximately 30% of the area of Upper Eythorne. Building on such a scale would be totally out of keeping with the Parish Council's vision for development through to 2016 (Eythorne Parish Council).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the village, wider landscape impact and pedestrian connectivity.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
NS01EYT (IC)		Kennel Hill is narrow, unlit and no footpath exists. The site is located adjacent to the Historic Park and Garden to the south of the village.		
		Support - Additional residential development at Eythorne would help to balance the existing and proposed employment provision within the settlement; would help to support, sustain and provide opportunities to enhance existing services and facilities; adjoins the existing settlement boundary; this area of countryside is not subject to any specific landscape designations; it is not envisaged that the whole of this area would be utilised for development. The higher ground to the east would be used for structural planting with housing located on the lower slopes; it would reduce the pressure on areas to the north, by maintaining the green wedge and sense of separation and openness between Upper and Lower Eythorne; development of the land at Kennel Hill would not have an adverse impact on the Eythorne Conservation Area, as this is focused on The Street to the		
NS01EYT (IC)		west; the site would be screened by the existing dwellings in Kennel Hill; the site comprises arable farm land and is considered not be of nature conservation or ecological importance; the hedgerow network that partly surrounds the site would be retained; well located with regard to the existing facilities; regular bus service to Dover and neighbouring settlements (bus stop located close to the proposed site); the site has sufficient frontage to Kennel Hill to provide a vehicular access with appropriate visibility splays; Kennel Hill provides direct access to the A256; site is readily available.		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01EYT (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from the site itself, but the wider surrounding landscape is generally rich in archaeological remains. Given the size of the proposed development site it is possible that presently unknown archaeological remains may be present within the site which could be affected by development. Development with archaeological measures may be possible on this site (KCC).		

Hougham

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 2 There are a number of sites in the south of the district that could either individually or in combination have the potential to adversely impact the safety/operation of the trunk road network, for example: Capel-le-ferne (SAD01 and SHL091) and West Hougham (NS01HOU) are located close to the A20 and Elvington & Eythorne (SHL088, SHL089 and NS01EYT); St Margarets at Cliffe & Bay (SHL073 and SAD28); and Shepherdswell (SHL075) are located close to the A2. As with the sites identified in other areas of the district if any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. We would expect to see mitigation measures put forward, as appropriate, to address any identified impact on the A20 and A2. These might include modal shift measures, such as contributions to improved public transport (Highways Agency).	KCC Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	
All Sites	Interim Consultation	No objection to the development of these sites in principle (KWT). All sites fall within the Kent Downs AONB and lie outside of the existing built confines. As such, Natural England recommends that where significant direct and indirect impacts upon the AONB will result, the site should not be allocated (Natural England).	The site analysis forms (examining each site individually) have included an analysis of the impact any development would have on the setting of the AONB, wider landscape impacts, biodiversity interests and access arrangements.	
HOU01	Land to the north east of Broadsole Lane and to the rear of Jubilee Cottage, The Street, West Hougham	Total reps: 4 Safe vehicular and pedestrian access to Broadsole Lane, The Street and Lady Garne Road; No intrusion into open countryside; No practical use to agriculture; retention of hedgerow planting and the restoration of the area around the pond would respect the existing loose knit character of the adjoining areas; No adverse effects on existing residential amenity; The site is available and has no physical constraints which would prevent development taking place.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and the character of the village edge.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Hougham

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
HOU01 (IC)		<p>Appears to contain woodland. Part of this habitat should be retained within the development design (KWT).</p> <p>The site lies wholly within the AONB and is poorly related to the village's settlement limits. West Hougham is a small village with very limited service provision and development of this scale is therefore inappropriate in such a sensitive and unsustainable location.</p> <p>Within AONB, large site which would have a major impact on the AONB and the character of the community. This large allocation is not justifiable using AONB criteria as set out in the Management Plan (Kent Downs AONB).</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval to Scale 5 No known archaeological potential on the site or part of it. No archaeological remains are known from the immediate vicinity of the site. The site does however lie close to the historic core of the village and it is possible that unknown archaeological remains may be present on the site. Development with archaeological measures may be possible on this site (KCC).</p>		
SAD29	Land at West Hougham (north of Apsley House and Flint Cottages)	<p>Total reps: 4</p> <p>The site is currently in use for waste management activities and its redevelopment would be compatible with the requirement for development in the AoNB to improve the natural beauty of the area in accordance with PPS7.</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and the wider landscape impact.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
SAD29 (IC)		<p>Poorly related to the village's settlement limits. West Hougham is a small village with very limited service provision and development of this scale is therefore inappropriate in such a sensitive and unsustainable location.</p> <p>Scale 5 No known archaeological potential on the site or part of it. No archaeological remains are presently known at the site (KCC).</p>		

Hougham

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NSHOU01 (IC)	Land to the north of Lady Garne Road, West Hougham	<p>Total reps: 3</p> <p>Within AONB, large site which would have a major impact on the AONB and the character of the community. This large allocation is not justifiable using AONB criteria as set out in the Management Plan (Kent Downs AONB).</p> <p>Poorly related to the village's settlement limits. West Hougham is a small village with very limited service provision and development of this scale is therefore inappropriate in such a sensitive and unsustainable location.</p> <p>Scale 5 No known archaeological potential on the site or part of it. No archaeological remains are presently known at the site (KCC).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, the wider landscape impact and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>

Ringwould Kingsdown

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 1 Tipping point for Deal maximum 6,000 residents / 2,400 units. Need to consider impact of all Deal locality developments (NHS Eastern and Coastal Kent).	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted
KIN03	Land at the end of Victoria Road, Kingsdown	Total reps: 21 The site falls into AONB and SLA; effect the character and appearance of the locality; loss of greenfield land. Previous planning applications refused due to landscape designations. Support. CPRE object. This site lies immediately adjacent to our property at Kingsdown Wood and we would strongly oppose residential development in this location. The change of boundary does not appear to be a sensible 'rounding off' of the urban area. The site is also bounded by public bridleways to the east and west and development would adversely affect the amenity of these rights of way (The National Trust).	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and its setting and damage Green Infrastructure interests.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
KIN03		The existing footpath forms a natural boundary. We see no purpose in extending the village envelope to give space for only 1 additional dwelling (Ringwould with Kingsdown PC). It has been the subject of a number of planning application which has been rejected. This land functions as a buffer between the village and the plots of land which a number of people are seeking to develop. The site lies in an area of considerable archaeological potential relating to cropmarks seen through aerial photography. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation) Loss of countryside; loss of woodland which has been the home to rabbits, foxes, badgers, green woodpeckers, barn owls and nightingales.		

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Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
KIN03		<p>The function of this land is being a buffer between the village and the plots of land which a number of people are seeking to develop.</p> <p>Greenfield site; To amend the confines here may set a precedent for other similar applications without good reasons which could undermine the local development plan.</p> <p>Not served by the road network and would require road access to be built from existing unadopted roads.</p>		
KIN06	Site to the west of Kingsdown Park Holiday Village	<p>Total reps: 2 It will ruin the views for the innumerable people that pass along the cliff walk and will mar the whole ambience of the area.</p>	The site analysis form demonstrates the site is unsuitable for development. This has included an analysis of the impact any development would have on the landscape.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
KIN07	The Scout Camp buildings and land running southwards from Woodlands, The Avenue to the junction of Kingsdown Hill and Oldstairs Road, Kingsdown	<p>Total reps: 2 It will ruin the views for the innumerable people that pass along the cliff walk and will mar the whole ambience of the area.</p> <p>Would have a major impact on the environment and visual aspect of Kingsdown and its surrounds. The scout camp can be viewed from the ANOB and Special Landscape Area. They have been purchase for speculative development which should be resisted.</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, biodiversity interests, problematic access arrangements and damage Green Infrastructure interests.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
KIN02M	Former Scout Camping ground, The Avenue, Kingsdown	<p>Total reps: 2 It will ruin the views for the innumerable people that pass along the cliff walk and will mar the whole ambience of the area.</p> <p>Would have a major impact on the environment and visual aspect of Kingsdown and its surrounds. The scout camp can be viewed from the ANOB and Special Landscape Area. They have been purchase for speculative development which should be resisted.</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, Heritage Coast designation, biodiversity interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan

Ringwould Kingsdown

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
KIN03C	Land between Innisfree & Glendale Lodge, Glen Road, Kingsdown	<p>Total reps: 4 Support (Ringwould with Kingsdown PC)</p> <p>Cropmark evidence suggests that a substantial ring-ditch exists within the indicated site boundary. In the event that the site was to be redeveloped it is possible that we would advise the refusal of planning permission on this site (KCC Heritage & Conservation).</p> <p>It should be noted that cropmark evidence suggests that a substantial ring-ditch exists within the indicated site boundary. In the event that the site was to be redeveloped it is possible that we would advise the refusal of planning permission on this site (Kent County Council).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be considered as an amendment to the settlement confines (as the capacity of the site is for fewer than 5 dwellings).</p>
SHL056	Properties along Bayview Road, Kingsdown	<p>Total reps: 55 Local opinion states that in the past the village envelope ran down the line of the rear gardens of Queensdown Road and not the edge of Bay View Road. We would not wish to see new development fronting Bay View Road as it would have a detrimental impact on the scenery (Ringwould with Kingsdown PC)</p> <p>House building should not be allowed along Bayview Rd and I would like to propose a 'zone of transition' between the built up area of the village and the Area of Outstanding Beauty along Bayview Rd.</p> <p>The rear gardens of Queensdown Road fill the gap to Bayview Road, which provide a soft edge between the Downs and the bungalows. Any development in this gap would be clearly seen from the abutting open downland beyond; Bayview Road is not suited for more residential development given the narrowness of the track, lack of footways, drainage, and substandard function with Victoria Road; Kent Downs, SLA and AONB; vulnerable fringe area.</p>	<p>Nationally, there are planning measures in place to ensure that inappropriate development would not take place (NPPF paragraph 53, National Parks and Access to the Countryside Act[1949]).</p>	<p>Development of the site would be strongly resisted through national planning policies. Local policies should not seek to duplicate these and therefore no amendments should be made in the pre-submission local plan</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL056 (IC)		<p>I support the proposal that the land in question should be REMOVED from the permitted development area; Gardens are now regarded as "greenfield" sites; Development of the site would have an adverse impact on an area of outstanding natural beauty; The existing village infrastructure is inadequate to support this development.</p> <p>The series of roads leading to Bayview Road are unadopted and are thus maintained by two current residents.</p> <p>Natural edge to the village of Kingsdown.</p> <p>Kingsdown is already deficient in infrastructure, road access and shopping/public transport/medical amenities; Bayview Road is unadopted and maintained privately.</p>		
SHL056 (IC)		<p>The Parish Council fully supports the request to exclude development in this area, which adjoins an AONB and, as such development of this scale would have a detrimental impact on the local environment. It would also represent a significant increase in the number of properties in this area, an over intensification in the context of the local infrastructure. Traffic is a particular problem in Kingsdown, and the number of incidents relating to traffic management reported to Kent Highways has increased considerably over the last year. Should this area be developed, the traffic problems are likely to increase and there will be particular issues relating to traffic movement over the unadopted and unmade roads in the immediate vicinity (Ringwould with Kingsdown PC).</p>		
SHL056 (IC)		<p>This development is within 433m of Dover to Kingston Clifves SAC and SSSI. Consideration will need to be given to the impact of the development on these sites both individually and in-combination with development within the rural south, Dover District and East Kent. Avoidance mitigation and compensation measures will need to be devised to ensure no impact on the SAC from this development. Protection of DO31 Walmer and Kingsdown Golf Course LWS The above site is adjacent to DO31 Walmer and Kingsdown Golf Course LWS. If this site is publicly accessible it is likely that this sizeable development may impact on this LWS. We recommend that the site be buffered and natural open space provided within the development design (KWT).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL056 (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies on the edge of the village and there are numerous cropmarks showing in the fields to the south and west. These cropmarks include ring-ditches, track-ways and enclosures. Archaeological remains including prehistoric flints and cut features have been previously identified within the site. Development with archaeological measures may be possible on this site (KCC).		
KIN04	Land to the south of Northcote Road, Kingsdown	Total reps: 1 Would have a major impact on the environment and visual aspect of Kingsdown and its surrounds. The scout camp can be viewed from the AONB and Special Landscape Area. They have been purchase for speculative development which should be resisted.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape, biodiversity interests and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
KIN05/LDF017	Land between the Village Hall and The Bothy, Upper Street, Kingsdown	Total reps: 7 Would have a major impact on the environment and visual aspect of Kingsdown and its surrounds. The scout camp can be viewed from the ANOB and Special Landscape Area. They have been purchase for speculative development which should be resisted. Keep the wall. Its part of the character of Kingsdown. Recommend that this site becomes a car park and not used for building. Houses proposed should be 'affordable'. Sensitive site (CPRE). Retention of the front wall. It is oppressive and denies the opportunity for a pavement. Residential development should be kept back from the road. Strongly support part of the area being used to extend or redevelop the village hall. Strongly support the use of part of the area for a car park (Ringwould with Kingsdown Parish Council).	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. Development of land to the rear of the site, which is raised, should be limited and preferably used for gardens and landscaping. A site specific policy will be included within the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
KIN05/LDF017		<p>The access is restricted by a flint wall and already serves five dwellings and a Holiday Park any further development of the land would need limited and off set against an improvement to local facilities e.g. the Village Hall and Car park (Kent Highway Services).</p> <p>The site lies close to the prehistoric and Roman find spots. Development of the site should include provision for a programme of archaeological works (KCC Heritage & Conservation).</p> <p>Support.</p>		
NS01KIN (IC)	Land to the rear of Ivy Cottage, Upper Street, Kingsdown	<p>Total reps: 13</p> <p>No frontal access; garden grabbing; unsuitable for an area which boasts conservation and listed properties.</p> <p>Access to the site is poor; there is no provision for parking; over development of a very small site; conservation area.</p> <p>AONB; facilities such as water, telephone lines etc are already under stress.</p> <p>The Parish Council opposes any proposal to develop this small area of land. Access is felt to be unsuitable, being a very narrow access point onto Upper Street which is already the subject of significant concerns about traffic movement. It would be over intensive development with an impact on the surrounding conservation area, the house would be in elevated position and as such have a severe visual impact on the vicinity. The Parish Council believe, that given the current issues with traffic management along Upper Street, the Rise and neighbouring roads, any such infill development which would increase traffic movement should avoided (Ringwould with Kingsdown Parish Council).</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the adjacent Conservation Area, the existing urban grain and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan
NS01KIN (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The village of Kingsdown is surrounded by numerous cropmarks which show evidence for buried archaeological remains and landscapes in the surrounding fields. A Romano-British occupation site is known to the south where pits, post-holes and ditches associated with 1st - 3rd century AD pottery were recorded. Development with archaeological measures may be possible on this site (KCC).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 3 The MODs principle concern relates to ensuring that tall structures especially tall buildings do not cause an obstruction to air traffic movements at MOD aerodromes or compromise the operation of air navigational transmitter/receiver facilities located in the area. As you will be aware air traffic approaches and technical installations at MOD aerodromes are protected with statutory safeguarding zones which identify height consultation zones in the area surrounding MOD aerodromes relative to topography and distance from the site (s). The MOD statutory height safeguarding zone for the district of Dover is for the main operational base RAF Mansion. On reading the Dover district Site Allocations Document, I can confirm the MOD has no statutory safeguarding concerns subject to development in 'Lydden' being no higher than 45.7m above ground level (Defence Estates).	Noted	Noted
All Sites	Interim Consultation	Protection of the Natura 2000 and Ramsar Network Due to the impacts from the WUE on Lydden to Temple Ewell Downlands SAC the Trust would recommend that further development is not allocated within Lydden (KWT). New surgery development scheduled for delivery in Sep 2011 - capacity provided	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted
SHL042	Land at Canterbury Road, Lydden	Total reps: 3 Within village confines; not greenfield; The development of the land represents the rounding off of built development for the village and helps to support local facilities. Moreover it represents only minor additional development.	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL042 (IC)		<p>The proposal is right on the boundary of the AONB and as such would need sensitive design. The site is poorly related to existing development, would sit badly in the views over the site from the AONB boundary and set a precedent for development of neighbouring areas not suggested in this consultation (Kent Downs AONB).</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site is located just to the north of Canterbury Road, which is the route of the main Roman road between Dover and Canterbury. To the south of the road a number of cropmarks have been recorded whilst fields to the north-west include lynchets of probable medieval date. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
Box 52	Land at Floreat, Old Roman Road, Martin Mill	Total reps: 8 Site in a small hamlet with existing residential development on all four sides; garden land that does not contribute to agriculture or the open countryside; It is within the Special Landscape Area, but this designation washes over all the surrounding settlements including those with designated village confines; in a sustainable location being within a short distance to the Martin Mill railway station; It is recognised that there have previously been highway objections to the further use of Old Roman Road and its junction but these are seen as supporting objections and not ones that would be sustained in their own right.	The site is located within a hamlet. Policy CP1 of the Core Strategy states that hamlets are not suitable for further development unless it functionally requires a rural location.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
Box 52 (IC)		Access to the site is poor and Green Lane, an unadopted road, has a poor surface. Three properties would bring with them a disproportionate increase in traffic to an area that has enjoyed a settled existence over a long period (Langdon Parish Council). Would adversely impact on the rural character; turning a rural greenfield location into a brownfield site; Neither the roads nor the infrastructure is sufficient to support such a large urban development. Such an increase will have an impact on class numbers and put additional strain on the local primary school; the land already has a perfectly useable property sited on it; development is not in keeping with any of the surrounding properties; impact on the Old Roman Road. Planning permission has already been refused for one dwelling. Question whether the sewage, electricity and water supply is adequate, no mains gas in the village.		
Box 52 (IC)		Access and poor sight lines from the junction with Station Road during opening hours at the Ugly Duckling were the main reasons for refusal. The public house is now a private dwelling and the parking issue no longer applies. However access to the site continues to be poor and Green Lane, an unadopted road, has a poor surface. Three properties would bring with them a disproportionate increase in traffic to an area that has enjoyed a settled existence over a long period (Langdon Parish Council). Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. No archaeological remains are known from the site itself, however there are a number of cropmarks in the fields surrounding the village (including ring-ditches, trackways and enclosures) which suggest a general background potential for prehistoric and Romano-British remains. Development with archaeological measures may be possible on this site (KCC).		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 1 Capacity within Deal (NHS Eastern and Coastal Kent)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted
SAD30	Land adjoining Raspberry Cottage, Church Lane, Ripple	Total reps: 13 The development area immediately abutts my property. Please note that the land adjacent to my house for a width of approx 4 metres has been in the sole use of my property and formed a part of my property as a drive, access and garden for more than 30 years. This land is therefore my property and I have rights over it. It therefore cannot form part of any development; agricultural land; narrow lane is unsuitable for any further development; unacceptable traffic for such a narrow country lane; To build a new development extending this historic row of cottages is completely inappropriate and would destroy the location and setting of our property; lack of facilities to cope with any additional development, i.e. the school in Ripple has recently been closed and there is no village shop.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape, problematic access arrangements and development could create unsustainable traffic movements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD30		<p>Building modern houses up tight to this historical building will be very much out of character.</p> <p>Development does not fit with the national policies or some of DDC's own Core Strategy policies for rural areas; Greenfield site and loss of agricultural land; outside the existing village confines; no public transport, development would generate travel; Residents would have to travel by car to work, shops or school; parking problems; No footpaths/walkways in Church Lane, which is a single track road; no mains drainage; no employment opportunities in or around Ripple.</p> <p>Illogical extension of village into the open countryside comprising ribbon development; issues of containment and future development and encroachment into countryside (CPRE).</p> <p>The site lies in an area of archaeological potential relating to cropmarks seen through aerial photography. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation).</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD30		<p>Ripple has been previously refused affordable housing because of the lack of amenities, which are still very limited; The village is already dangerously busy from traffic avoiding the A256 traveling between the Deal area and Whitfield/A2.</p> <p>Parking for residents of Portland Terrace is already a problem and use has to be made of the parking facilities of the pub.</p> <p>There are few, if any, local attractions for children within the village and vandalism among local youths has been a problem to date.</p> <p>Whilst the Parish Council is not against some new development within the village, it does have concerns about the proposed residential development at Church Lane, Ripple (Map 56), with the main concerns regarding to the width of the road, parking and the general infrastructure of the immediate area (Ripple Parish Council)</p>		

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	<p>Total reps: 6</p> <p>There are a number of sites in the south of the district that could either individually or in combination have the potential to adversely impact the safety/operation of the trunk road network, for example: Capel-le-ferne (SAD01 and SHL091) and West Hougham (NS01HOU) are located close to the A20 and Elvington & Eythorne (SHL088, SHL089 and NS01EYT); St Margarets at Cliffe & Bay (SHL073 and SAD28); and Shepherdswell (SHL075) are located close to the A2. As with the sites identified in other areas of the district if any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. We would expect to see mitigation measures put forward, as appropriate, to address any identified impact on the A20 and A2. These might include modal shift measures, such as contributions to improved public transport (Highways Agency).</p>	<p>KCC Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.</p>	
All Sites	Interim Consultation	<p>Protection of DO36 Woods near Shepherdswell LWS - Kent Wildlife Trust has no objection to any of the identified sites being developed. DO36 Woods near Shepherdswell LWS, designated for its ancient woodland is around 300m from the nearest development and may suffer from recreational pressure due to increased development. The Trust recommends that monies be obtained to ensure the LWS is managed to increase its resilience to recreational impacts (Kent Wildlife Trust).</p> <p>Inadequate road access, limited foul drainage capacity and poor bus service (Shepherdswell with Coldred Parish Council).</p> <p>The road at Whittington Terrace, Cox Hill tends to flood.</p> <p>Capacity within branch site at Shepherdswell and current nurse led service at Elvington (NHS Eastern and Coastal Kent).</p>	<p>The site analysis forms (examining each site individually) have included an analysis of the impact any development would have on the setting of the AONB, wider landscape impacts, biodiversity interests and access arrangements.</p>	Noted
LDF18	Land off Mill Lane, Shepherdswell	<p>Total reps: 4</p> <p>Support (Shepherdswell Parish Council)</p> <p>Support (CPRE).</p> <p>Sight lines may be an issue as could require third party land (Kent Highway Services).</p> <p>The site lies in an area of archaeological potential relating to cropmarks seen through aerial photography. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHE02	Land between 68 and 96 Westcourt Lane, Shepherdswell	<p>Total reps: 8</p> <p>Lies on the outskirts fo the village; special landscape area; detrimental to the amenity of the area; extra traffic; Westcourt Lane is a narrow, single-way road and has no footpath.</p> <p>Greenfield site.</p> <p>The traffic has already increased in volume and speed since the re-development of the old Tilmanstone Colliery site and the closure of the A2 - Barfreston Road junction.</p> <p>Detrimental landscape impact on the village edge/boundary.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape, problematic access arrangements and development could create unsustainable traffic movements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
NS01SHE (IC)	Land to the west of Coxhill	<p>Total reps: 5</p> <p>The site lies outside of the village confines; would cause additional traffic problems on a narrow and busy road; greenfield site; no footway.</p> <p>Most suitable site put forward in Shepherdswell as it has an access to a main road but the road from the A2 is a single track road; the road is inadquate; congestion no Coxhill will become intolerable; provision should be made to accommodate the public footpath which runs right through the centre of the site.</p> <p>Public Right of Way ER81 is missing from the site allocation map.</p> <p>The location of houses at that point would seek to slow traffic as it came into the village; the road is well used already and in good condition; excellent train service and easy access to the A2; a thriving post office and Co-Op store and for those stores to survive in the future an increase in population can only be for the good.</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan.</p>
NS01SHE (IC)		<p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Aerial photographic images show some cropmarks in the fields on the opposite side of Coxhill Road. The cropmarks include a possible small enclosure. Metal detecting finds from the area include early medieval and medieval finds. Development with archaeological measures may be possible on this site (KCC).</p>		

Shepherdswell

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS03SHE (IC)	Land at 50 Mill Lane, Shepherdswell	<p>Total reps: 4</p> <p>The development is totally inappropriate as it is in an elevated position outside the village confines; will destroy the soft boundary of the village; inadequate access.</p> <p>The location of houses at that point would seek to slow traffic as it came into the village; the road is well used already and in good condition; excellent train service and easy access to the A2; a thriving post office and Co-Op store and for those stores to survive in the future an increase in population can only be for the good.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies on the north-west side of the village of Shepherdswell where extensive cropmark remains can be seen. Nearby cropmarks include ring-ditches, rectangular and circular enclosures, fieldsy-stems and track-ways. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the wider landscape and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
SHE04V	Land at 4 Mill Lane, Shepherdswell	<p>Total reps: 4</p> <p>The site lies within the village conservation area and is close to listed buildings.</p> <p>Parking is already difficult in this part of the village.</p> <p>The location of houses at that point would seek to slow traffic as it came into the village; the road is well used already and in good condition; excellent train service and easy access to the A2; a thriving post office and Co-Op store and for those stores to survive in the future an increase in population can only be for the good.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Numerous cropmarks showing evidence for buried past landscapes in an around the village can be seen on aerial photographs. These cropmarks include ring-ditches, rectangular and circular enclosures, fieldsy-stems and track-ways. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be considered as an amendment to the settlement confines (as the capacity of the site is for fewer than 5 dwellings).</p>

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
All Sites	Interim Consultation	Total reps: 2 There are a number of sites in the south of the district that could either individually or in combination have the potential to adversely impact the safety/operation of the trunk road network, for example: Capel-le-ferne (SAD01 and SHL091) and West Hougham (NS01HOU) are located close to the A20 and Elvington & Eythorne (SHL088, SHL089 and NS01EYT); St Margarets at Cliffe & Bay (SHL073 and SAD28); and Shepherdswell (SHL075) are located close to the A2. As with the sites identified in other areas of the district if any of the sites outlined above have the potential to materially impact on the trunk road network they will need to submit a robust Transport Assessment and Travel Plan. We would expect to see mitigation measures put forward, as appropriate, to address any identified impact on the A20 and A2. These might include modal shift measures, such as contributions to improved public transport (Highways Agency).	KCC Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	
All Sites	Interim Consultation	All sites are within the AONB and would have a detrimental effect on the AONB or the character of St Margaret's (Kent Downs AONB). All sites fall within the Kent Downs AONB and/or the South Foreland Heritage Coast and lie outside of the existing built confines. As such, Natural England recommends that where significant direct and indirect impacts upon the AONB will result, the site should not be allocated (Natural England).	The site analysis forms (examining each site individually) have included an analysis of the impact any development would have on the setting of the AONB, wider landscape impacts, biodiversity interests and access arrangements.	Noted
STM03	Land at the junction of Station Road and Nelson Park Road, St Margaret's	Total reps: 3 CPRE Support. The site lies in an area of archaeological potential relating to cropmarks seen through aerial photography. Provision should be made for a programme of archaeological works in advance of development of the site (KCC Heritage & Conservation).	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be considered as an amendment to the settlement confines (as the capacity of the site is for fewer than 5 dwellings).
SHL073	Land adj Townsend Farm, St Margarets at Cliffe	Total reps: 6 Brownfield; This land has been the site of a railway, railway siding, a munitions dump, an army encampment complete with Nissan huts and an underground hospital, the remnants of which still exist; A portion of the original site has already been given building permission; A new access could also serve as a possible entry/exit for St Margaret's Country Club which will allow traffic to and from the Country Club to avoid using the narrow, congested High Street.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and Conservation Area.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SHL073 (IC)		<p>Too big an impact on AONB and visual impact degradation (St Margaret's at Cliffe PC).</p> <p>Three separate representations were submitted on behalf of RC Claringbould & Sons in July 2010. The representations sought separate consideration of three sites within the overall SHL073 area. It is requested that the merits of these three separate land parcels are considered separately in the analysis to be undertaken by Planning Officers. The site adjoins the existing village and is enclosed on 3 sides by: existing housing at Ash Grove playing fields a holiday camp. Vehicular access is available from Townsend Farm Road.</p>		
SHL073 (IC)		<p>Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Previous archaeological investigations within the site have identified the presence of a possible Bronze Age ring-ditch and a number of Anglo-Saxon burials on the northern end of the site. Development should be avoided on the northern part of the site where a Bronze Age burial mound and an Anglo-Saxon cemetery is known. Pre-determination evaluation would be necessary to determine whether development is possible within the remaining part of the site (KCC).</p>		
SAD28	Land between The Drove way and Salisbury Road, St Margaret's	<p>Total reps: 6</p> <p>The village has a regular bus service to Deal, Dover and Canterbury; train stations at Martin Mill and Walmer; development would be sustainable with good local services, transport links and areas of employment; no constraints on the land and it can be released for development when required.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB and problematic access arrangements.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
SAD28 (IC)		<p>Inadequate road access to the site, detrimental effect on the AONB. Why not rejected as STM09 (St Margaret's at Cliffe Parish Council).</p> <p>Although we have no objection to the majority of the sites we are concerned regarding the impact of SAD28 on the Dover to Kingston Cliffs SAC both individually and in combination with other development planned for the surrounding areas. This site is within 187m of Dover to Kingston cliffs SAC and SSSI. With 78 houses there is likely to be a sizeable impact on the sensitive ecology. This will need to be assessed through the strategic HRA process with appropriate avoidance mitigation and compensation measures formulated. This site may be too near to the designated sites and may need to be excluded from development (KWT).</p>		

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD28 (IC)		Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Past development to the south-west of the site between Salisbury Road and The Drove way has revealed evidence for both prehistoric and Anglo-Saxon burials. There is also evidence for Iron Age occupation. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).		
STM09	Land to the north of Salisbury Road, St Margaret's Bay	Total reps: 1 The village has a regular bus service to Deal, Dover and Canterbury; train stations at Martin Mill and Walmer; development would be sustainable with good local services, transport links and areas of employment; no constraints on the land and it can be released for development when required.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB, Heritage Coast, biodiversity interest and problematic access arrangements.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
SHL043	Land to the rear of Reach Meadow and south of Sea Street, St Margaret's at Cliffe	Total reps: 3 It would form an attractive extension to St Margaret's residential offer; vacant possession can be achieved; The site is within a special landscape area but a sympathetic development could enhance the area; The site and access to the road are owned by Dover District Council and is a medium term development prospect.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB and the setting of St. Margaret's at Cliffe and St. Margaret's Bay.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
SHL043 (IC)		Detrimental effect on AONB (St Margaret's at Cliffe Parish Council) Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies to the north of a Bronze Age barrow cemetery which acted as a focus for later early medieval burials. There is also evidence for Iron Age occupation and Romano-British burials. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).		
STM02C (IC)	Land behind The Lindley, Station Road, St Margaret's at Cliffe	Total reps: 4 Incorrect site outline shown, only 585 sq m put forward.; site is well shielded by mature trees hedges	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
STM02C		<p>AONB.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. There is extensive cropmark evidence from the fields to the west of Station Road that suggests that the area was occupied in prehistoric times. Cropmarks of enclosure, linear features and ring ditches have been found nearby. Development with archaeological measures may be possible on this site (KCC).</p> <p>Outside village confines (St Margaret's at Cliffe Parish Council).</p>		
STM01/STM07	Land to the rear of Jean, Kerry Croy, Eriskay & Little Orchard, St Vincent Road, Nelson Park	<p>Total reps: 6</p> <p>The site has the same policy constraints, i.e. AONB and SLA designations as the site proposed for allocation at STM03; The site is well screened and below the skyline where development, particularly single storey, would have little impact in the landscape.</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the AONB.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
STM01/STM07 (IC)		<p>Why not rejected for same reason as STM01? (St Margaret's at Cliffe Parish Council)</p> <p>AONB.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. There is extensive cropmark evidence from the fields to the west of Station Road that suggests that the area was occupied in prehistoric times. Cropmarks of enclosure, linear features and ring ditches have been found nearby. Development with archaeological measures may be possible on this site (KCC).</p>		
STM04	Land to the north of Nelson Park, St Margaret's at Cliffe	<p>Total reps: 3</p> <p>Why has Nelson Park not been developed over the years as it was sold years ago as building land?</p>	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and would be against the existing urban grain.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
STM04 (IC)		<p>The site is poorly related to the village's settlement boundaries.</p> <p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies in an area that is rich in cropmarks. Immediately to the north of the site, and apparently projecting into the area in question, there are cropmarks showing a ring-ditch, trackway and rectilinear enclosures/track-ways. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>		

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
SAD27	Land to the south west of St Margaret's Country Club	Total reps: 4 The site is within the ownership of Park Resorts and can be made readily available for development. The land is designated as falling within the AONB but is well screened. The area would be used for the siting of holiday lodges. Bring positive economic impact to the local area.	The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB, wider landscape impact and consideration of the economic benefits of increasing the number of static caravans.	The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.
SAD27 (IC)		St Margaret's Resort is large enough (St Margaret's at Cliffe Parish Council). AONB. Support - Providing and supporting tourism in the district; available and unconstrained in terms of flooding; the site is within an AONB however the site does not exhibit any of the characteristics typically associated with AONB landscape; the site could be accessed from the local highway network independently of any improvements; an extension to an existing and established holiday park; expanding existing facilities will have a low impact on the surrounding areas as the necessary infrastructure is already in place; site self contained within established landscape boundaries; would inject business into the local economy and bring additional trade to shops and businesses in St Margaret's; Sustainable village with church, shop, hall, public houses, fire-station, school and houses all located around the main route through the village; Rail station located approximately 1.47 miles north west of the site; the nearest bus stop is located 321 metres from the site.		
SAD27 (IC)		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies on the edge of downland that is rich in archaeological remains, with enclosures and ring-ditches seen in the field just to the south and west. Development with archaeological measures may be possible on this site (KCC).		

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01STM (IC)	Land at 2 Townsend Farm Road, St Margaret's at Cliffe	<p>Total reps: 3</p> <p>The boundary includes one property within the village confines and excludes another which was built at the same time. This representation seeks a revision to the village confines to include the dwelling and its garden within the village confines. The property does not abut open countryside.</p> <p>Over development of site (St Margaret's at Cliffe PC).</p> <p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies immediately adjacent to a known Bronze Age burial mound and an Anglo-Saxon cemetery. The extents of this cemetery are not presently known and it is possible that such remains may extend into the site in question. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development. This has included an analysis of the impact any development would have on the setting of the AONB given that the capacity of the site is for under five units.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan</p>
NS02STM (IC)	Land at 2 Townsend Farm Road & Ash Grove, St Margaret's at Cliffe	<p>Total reps: 4</p> <p>The boundary includes one property within the village confines and excludes another which was built at the same time. The local needs housing development at Ash Grove has been completed and thus the built confines of the village extend beyond the current boundary. This representation seeks a revision to the village confines to include all of the existing dwellings within the village confines.</p> <p>Over development of site (St Margaret's at Cliffe PC).</p> <p>The site lies within the AONB.</p> <p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies immediately adjacent to a known Bronze Age burial mound and an Anglo-Saxon cemetery. The extents of this cemetery are not presently known and it is possible that such remains may extend into the site in question. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>	<p>The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.</p>	<p>The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. An individual policy to set out possible access options, together with areas of higher ground which should remain undeveloped will be included.</p>

St Margaret's at Cliffe

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS03STM (IC)	1 The Paddock, Townsend Farm Road, St Margaret's at Cliffe	Total reps: 3 Over development of site (St Margaret's at Cliffe PC). The site lies adjacent to the AONB Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies immediately adjacent to a known Bronze Age burial mound and an Anglo-Saxon cemetery. The extents of this cemetery are not presently known and it is possible that such remains may extend into the site in question. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).	The site analysis form demonstrates that in principle the site is suitable for development. The issues raised by the consultation are capable of being resolved through the design process, they are not a barrier to development and therefore do not alter the overall conclusion.	The site is considered to be suitable for residential development, and should be allocated in the pre-submission local plan. An individual policy to set out possible access options, together with areas of higher ground which should remain undeveloped will be included.

Sutton

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
NS01SUT (IC)	Hopehaven' Roman Road, Maydnesole	<p>Total reps: 4 Would like to keep open the option of building a house at the southern end.</p> <p>Site is in a hamlet. Against development of this site (Sutton Parish Council).</p> <p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies adjacent to the Roman road between Dover and Richborough. There are extensive cropmarks immediately to the south of the site which are bisected by the Roman road and seem to represent an extensive Iron Age settlement. There are also a number of probable Bronze Age burial mounds nearby. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>	<p>The site is located within a hamlet. Policy CP1 of the Core Strategy states that hamlets are not suitable for further development unless it functionally requires a rural location.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
NS02SUT (IC)	Chapel Lane, Ashley	<p>Total reps: 4 Site is in a hamlet. Against development of this site (Sutton Parish Council).</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies adjacent to the main Roman road between Dover and Richborough. There are numerous cropmarks in the fields to the north and south of the village, although no remains are presently known from the site itself. Development with archaeological measures may be possible on this site (KCC).</p> <p>Detrimental landscape impact; development lacks sustainability; no rural need for a development on this site.</p>	<p>The site is located within a hamlet. Policy CP1 of the Core Strategy states that hamlets are not suitable for further development unless it functionally requires a rural location.</p>	<p>The site is considered unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>

Rural North Representations Summary Table

Ash

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	Total reps: 3 Kent Wildlife Trust has no objections in principle to any of the sites identified within Ash. However we would wish to highlight the possible impacts on DO21 Ash Levels and South Richborough Pastures LWS if all sites were delivered. Consideration should be given to protection of the above sites with monies for management and buffering obtained as mitigation for any impact (Kent Wildlife Trust).	The area covered by DO21 Ash Levels and South Richborough Pastures LWS is predominantly private land with few public rights of way. The main impact pathways as described in the citation for DO21 are concerned with the management of water levels.	Noted.
All Sites	Interim Consultation	A number of sites in neighbouring Local Centres (Ash & Eastry), the Rural Service Centre of Sandwich and the District Centre of Deal have potential to impact on Worth. Planned local infrastructure provision is less than half required for the Adopted Core Strategy of 14,000 new homes in the district. If all the new homes already identified as required by the Medium Growth Strategy in the North of the district are developed, there is great concern that the A258 and local road network is not adequate to carry the anticipated increase in traffic without increasing danger to existing residents and road users. Further development to meet requirements of the High Growth Strategy demands major infrastructure improvements in the North of the District if it is to be sustainable (Worth Parish Council).	Kent Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	Noted.
246 All Sites	Interim Consultation	Tipping point reached at 612 residents / 250 units. Capital investment would be required to enhance facilities at Ash. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
SHL026	Land at Chequer Lane, Ash	Total reps: 6 Unless other reasonable options are considered and tested, including further site options at the North and West of Ash (Molland Lane and Chequer Lane) and a robust SHLAA is produced, the result could eventually be a failure against Soundness Test 7. There is simply not enough evidence provided to underpin the Council's assertion that there are insufficient sites available in Local Centres. It is just that possible alternative sites, such as site interests at Molland Lane and Chequer Lane, haven't been considered and tested. Well situated to provide easy access via foot or cycle to all the local services and facilities that exist within Ash; easy access to the public transport services; no listed buildings.	The SHLAA is considered to be robust for the purpose it was designed for. Further assessment work for each site has been undertaken and this is reflected in the site analysis form. The form demonstrates that this site is suitable for residential development.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>High quality farmland.</p> <p>This site is bounded by the A256 and the traffic noise and pollution make it particularly unsuitable for housing development. A large housing development at this site would alter the character of the area.</p> <p>Lies directly adjacent to the village's settlement boundary and is adjoined by development to the south and by the village bypass to the north clearly defining the site limits. The site is not affected by any significant environmental constraints; the site is well situated to provide easy access via foot or cycle to all the local services and facilities; easy access to the public transport services; located within walking distance of the village centre and to the school; appropriate access can be achieved onto Chequer Lane; there are no constraints in respect of infrastructure provision; no impact on conservation areas; no Listed Buildings; no adverse impact on neighbour amenity; greenfield site in single ownership.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval to Scale 5 Development with archaeological measures may be possible on this site (KCC).</p>		
SHL081	Land at Molland Lane, Ash	<p>Total reps: 4</p> <p>Well situated to provide easy access via foot or cycle to all the local services and facilities that exist within Ash; easy access to the public transport services; no listed buildings.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape and would introduce a hard urban edge to the rural setting of the village.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>At the extreme western end of the village and will start to turn Ash into an unattractive linear settlement.</p> <p>The document mistakenly suggests the site has capacity for 6 dwellings whereas it has capacity for 46 dwellings; directly adjacent to the village's settlement boundary and is well related to the village centre; there are no environmental constraints; easy access via foot or cycle to all the local services and facilities that exist within Ash; easy access to public transport; no constraints in respect of serving the Molland Lane site with adequate infrastructure provision; no impact on the Street End Conservation Area, and very limited impact upon The Street and Guilton Conservation Areas; vehicular access is proposed from Molland Lane and the existing tree and hedge screen around the site is proposed to be retained; no Listed Buildings; greenfield site in single ownership; the site is available for development now.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
ASH03	Nursery site, including 103 Sandwich Road and 98 New Street, Ash	<p>Total reps: 2</p> <p>The grounds cited by the Council for its rejection should be reviewed.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to there being no suitable access and development having a detrimental impact on the wider landscape and setting of the village.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
	Interim Consultation	<p>The site has road frontage to Saunders Lane, Sandwich Road and New Street. It also has existing access points on to Saunders Lane; Saunders Lane is a well used lane but it is narrow and with no footways; rejection of this site for the above reasons appears to have been undertaken without any detailed analysis. A suitably designed scheme could bring community benefits and could be designed to mitigate any detriment to the landscape or the character of the village; there is no reason why this site could not be developed in 0 - 5 years.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
LDF04 (including individual sites ASH04, ASH06, ASH07, ASH09, ASH10 & ASH11)	Land between Cherry Garden Lane and 79 Sandwich Road (including 52 New Street to the south)	Total reps: 31 Landowner support. Additional assessments required on physical infrastructure due to large scale recent development on adjacent sites; loss of services, employment, agricultural land; supporting biodiversity is an important factor; Access onto Sandwich Roads need assessment (Ash Parish Council). CPRE consider that there is potential for further development within the area shown to the south of Sandwich Road, Ash, but that the orchard land should be excluded and retained (possibly as a community orchard). This would probably limit the site capacity to nearer 50 dwellings. Any further development in Ash should be phased for after 2012. Multiple ownership; loss of existing buildings used for employment purposes; demolition of three existing dwellings; contrary to the principles of sustainability. Main access to the site should be from Sandwich Road, should be no access of any sort onto Cherry Garden Lane; need to confirm the role of Pipping Close in providing the second access. Emergency vehicle access from Cherry Garden Lane.	Ash has been identified as a Local Center in the Settlement Hierarchy, the secondary focus for development in the rural area, based on the high number of facilities and services in the settlement. This site is located between two recent developments identified in the 2002 Local Plan. The site consists of five individual sites. Each of these sites have been assessed and are considered suitable for development, either separately or as one. Only one site, ASH09, would need to be developed in conjunction with the adjacent site as there is no suitable access to it. ASH10 is also developed. Although it would be preferable to have one comprehensive development, this may not be possible as one site (ASH07) has current employment use. This would essentially split the overall site. Access would be still possible to each of the remaining sites (please see responses to consultation on specific access options).	The site is considered to be suitable for development, either as one large site or as smaller sites. Access issues are also resolvable if the sites are developed separately. Access options would be finalised during the Development Management process.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Sandwich Road, Ash (Southern Water).</p> <p>The level of development will require two points of access or a loop design road layout with a short connecting road to the existing highway network. There would still be a requirement for an emergency access which could be served off New Street. A transportation Assessment would be required (Kent Highway Services)</p> <p>Serious question marks about its availability to deliver housing; constrained by multiple ownership.</p> <p>The site has potential for Iron Age, Roman and Saxon remains. Development of the site should include provision for archaeological evaluation and mitigation measures (KCC Heritage & Conservation)</p> <p>Well located to the existing settlement; not subject to flooding; accessible to the immediate road network; excluded from environmental and ecological designations: previously developed Prominent site; hedges and biodiversity; reducing local employment through relocation of 2 existing business users</p> <p>Support development but suggest 17 Phippen Close as an alternative main and/or emergency access. Access from Sandwich Road is not possible due to existing development (employment and residential), leaving site landlocked. KCC has agreed a suitable scheme.</p> <p>Currently in employment use; known to be in a number of different ownerships, which raises doubt about suitability, sustainability and deliverability of the site for development.</p>	<p>There are no plans to move the employment use in the next five years but the owners have indicated that it may be a possibility in the longer term. This, together with the large capacity of employment land in the District, particularly at Sandwich, indicates that it would not be possible to insist on retaining this use in the long term.</p> <p>Of the five sites, there is only one which is agricultural land (ASH06) and this consists of an orchard with associated sheds. The remaining sites are either developed (ASH07 & AS10), a privately own field (ASH04) or horse paddocks (ASH09). The need to retain this small orchard does not outweigh the housing requirement set out in the Core Strategy.</p>	
		<p>Please also see comments relating to Access Options to LDF04</p>		
SHL002	Land at Guilton Farm, Ash	<p>Total reps: 6 Support. Include land at Guilton farm within the confines of Ash.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Would have an adverse impact on the setting of the Listed Building.</p> <p>Revising the village confines as requested will include buildings and land which are already in residential use within the village and would not result in incursion into the open countryside.</p> <p>The site lies within the conservation area and the development of the site could have an adverse affect on the character and appearance of the conservation area. The site is situated away from the main part of the village and its development will consolidate an area of ribbon development.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies to the south of the line of the Roman road from the town and port of Richborough to Canterbury. To the south-east of the site is the Scheduled Monument of Guilton early medieval cemetery. Guilton Farm itself is shown on the first edition Ordnance Survey map and may be of local historic interest. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The site analysis form demonstrates that the inclusion of the site in the settlement confines would be unsuitable due to the possible impact additional development would have on the Conservation Area, Listed Buildings and on the wider landscape.</p> <p>There is policy support (DM4 in the Core Strategy) for conversion of buildings to dwellings adjacent to the confines</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the Submission Plan.</p>
251	SHL002V (IC) Land at Guilton Farm, Ash (variation on the boundary of SHL002)	<p>Total reps: 4</p> <p>At the extreme western end of the village and will start to turn Ash into an unattractive linear settlement.</p> <p>Previously developed land; Development of the existing agricultural building and immediately surrounding land to the south, would not result in intrusion into the wider open countryside.</p> <p>Part of the site lies within the conservation area; the site is situated away from the main part of the village and its development will consolidate an area of ribbon development.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies to the south of the line of the Roman road from the town and port of Richborough to Canterbury. To the south-east of the site is the Scheduled Monument of Guilton early medieval cemetery. Guilton Farm itself is shown on the first edition Ordnance Survey map and may be of local historic interest. Development with archaeological measures may be possible on this site (KCC).</p>	See above	See above

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SAD24	Former Council Yard, Molland Lea	Total reps: 4 This land currently houses the local Scouts Hall, any development on this site should make provision for the replacement of this facility (Ash Parish Council). Support (CPRE). A programme of archaeological works should be provided in advance of development of the site (KCC Heritage & Conservation).	The site analysis form demonstrates that the site is suitable for development in conjunction with SHL026.	The site is considered to be suitable for residential development and should be allocated together with the larger site SHL026 in the pre-submission local plan. Reference to the scout hut to be added to supporting text.
	Interim Consultation	9th Deal (Ash) Scouts have a lease on the Scout hut, Molland Lea, Ash with DDC property services and request that the hut and car parking area are not included in the local development Area Framework site allocation.	The issue is noted. This is a well used social use that should be retained. Will seek the retention or relocation of the scout hut in any development.	
SHL019	Land at Great Pedding Farm, Nr Ash	Total reps: 2 1) Ash is identified as a Local Centre in the Preferred Options Document; 2) Other proposed sites are outside the confines of Ash; 3) the buildings are no longer required for agricultural purposes; and 4) Would not involve the loss of open countryside and provide further choice in housing.	The site is located over two kilometres from the centre of Ash in a rural location. The site would be contrary to Core Strategy Policy CP1.	The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	Support. The site is no longer required for agricultural purposes. Redevelopment would not involve the loss of open countryside. The site is also reasonably well located in relation to the village of Ash.		
SHL014	Land between A257 Ash Bypass and Old Sandwich Road, Guilton Farm	Total reps: 4 This site is well located to Ash. Is currently within agricultural use and therefore is not constricted by any land contamination issues. Not located within the floodplain. Ideally located for B8 distribution uses. The site is unconstrained.	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape, setting of the Conservation Area and Listed Buildings and concern with increased pedestrian movements along an 'A' road.	The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>At the extreme western end of the village and will start to turn Ash into an unattractive linear settlement.</p> <p>Outside of the existing village confines; bounded by the A256 and traffic noise and pollution make it an unsuitable site for housing.</p> <p>Guilton Conservation Area; extra traffic from the access roads would make the roads even more dangerous.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
SAD25	Land to the east of 47 New Street, Ash	<p>Total reps: 3</p> <p>The site can be developed with a safe access. Close to public transport and a wide range of village facilities. Would contribute a significant number of dwellings which would take pressure off outlying rural areas.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape and setting of the village through the loss of a soft edge.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>
	Interim Consultation	<p>The site is very difficult to access from New Street due to the topography.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
SHL011	Site at Millfield	<p>Total reps: 6</p> <p>Single ownership; well screened; It has an adequate access and all site services are laid to the turning head in Millfield; poor grade agricultural land (former derelict orchard); Jack Foat Trust committed to providing for local housing need; flood risk - negligible; access - good; historic environment - none.</p>	<p>The site analysis form demonstrates that only the northern part of the site is suitable for development due to the detrimental impact on the wider landscape and setting of the village.</p>	<p>The northern section is considered to be suitable for development and should be allocated for development in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>The site owners are happy to offer a higher proportion than the norm of affordable housing; Another housing needs survey has recently been carried out in the village which identifies the need for 22 more units; The site is next to existing affordable housing; low grade 'waste' agricultural land; Close to the existing housing facilities and within walking distance of the bus services through the village for access to schooling and shopping facilities in Sandwich.</p> <p>The road network leading to the site is relatively poor.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The purpose of this Plan is to identify suitable residential sites. This part of the site is suitable for development, either for open market or affordable homes. If the site is developed, a contribution to the provision of affordable housing would be required (Core Strategy Policy DM5).</p>	
SHL013	The Vineries and 115 New Street, Ash	<p>Total reps: 4 Ash has a wide range of services; land between the Vineries and the village confines to the west, has already been developed with additional properties and no.'s 111, 115 should now be included in the confines; further development of the land would provide much needed new housing without incursion into the open countryside adjoining Ash.</p>	<p>The site analysis form has demonstrated that there is little scope for further development due to existing dwellings and a recent planning permission to redevelop a demolished building. If further development was permitted through the change of confines this would have a detrimental impact on the setting of Ash and the wider landscape.</p>	<p>The extension to the Settlement Confine is considered to be unsuitable and should not be included within the pre-submission local plan.</p>
	Interim Consultation	<p>The site lies away from the main part of the village and some distance from the majority of the village's shops, services and facilities; its development will necessitate the demolition of a number of existing dwellings.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
SHL004	Land opposite the junction of Durlock Road, Guilton	<p>Total reps: 17 This site is currently within agricultural use and therefore is not constricted by any land contamination; not located within the floodplain; within reasonable walking distance of local facilities and convenient for the bus route.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the setting of the Conservation Area, Listed Buildings and on longer views of the village.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Prime agricultural land; Access and egress from the proposed development would be extremely dangerous.</p> <p>The site is located within an existing conservation area; impact on the setting of listed buildings; greenfield site; increase the ribbon development of the village.</p> <p>It may be possible to have limited, sensitive development without damaging the particular character of the area.</p> <p>Areas of open space from the road are very important.</p> <p>Would compromise the traditional appearance of the village; implications for traffic volume and would certainly present a challenge as it faces the junction with Durlock Road.</p> <p>The site is situated away from the main part of the village.</p> <p>The principal roads - Gilton, The Street, Chequer Lane, Queens Road, Sandwich Road and New Street are all two lane tracks one of which is permanently occupied with stationary vehicles.</p>		
SHL004 (IC)		<p>Would reverse much of the benefit achieved in recent years by the construction of the Sandwich by-pass (A257); sited on a sharp bend making access difficult.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p> <p>At the extreme western end of the village and will start to turn Ash into an unattractive linear settlement.</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
ASH01	Land at 99 Sandwich Road, Ash	Total reps: 1 Suitable access can be achieved; potential biodiversity value is not supported by any evidence	The site has been subject to a past planning application, which was refused on the grounds that development would be detrimental to the setting of the Listed Building. If the Settlement Confines were amended to include this and the neighbouring properties (See SHL012), the issues raised at the planning application would still be a consideration for any other applications.	The site should not be allocated for development but the settlement confines should be changed to include land at 99 Sandwich Road and the neighbouring properties.
NS01ASH (IC)	Land to the rear of Queens Road, adjacent Recreation Ground, Ash	Total reps: 3 High quality farmland. This site is bounded by the A256 and the traffic noise and pollution make this site unsuitable for large scale housing development. Poorly related to existing development in the village; Its development will detrimentally impact on the open setting and character of the recreation ground. Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for development due the detrimental impact on the wider landscape and the setting of the village. Queens Rd is also considered to be unsuitable for development at this scale.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NS02ASH (IC)	Land to the rear of properties on Sandwich Road and adjacent Recreation Ground, Ash	Total reps: 3 High quality farmland. The site is poorly related to existing development in the village; Its development will detrimentally impact on the open setting and character of the recreation ground. Access into the site also appears to be poor. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for development due to poor access and a detrimental impact on the setting of the Conservation Area and wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
ASH02V (IC)	Land to the rear of 47 New Street, Ash	<p>Total reps: 3</p> <p>Will be unable to use the Millfield access and will only add to highway problems on this narrow stretch of road.</p> <p>The road network leading to the site is relatively poor and would not satisfactorily accommodate the traffic envisaged; detrimental impacts on the conservation area and nearby listed buildings.</p> <p>The development of this site would fill in a gap within the built development along New Street, since the site is surrounded by residential development on three sides; development would form a logical extension to the village confines. Access is proposed to be gained from the northern part of the site off New Street and discussions are taking place with the owner of this parcel of land immediately adjacent to New Street; Emergency access could be taken from Moat Lane to the south.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape and the setting of the village, the urbanisation of PRow and poor access.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
SHL012 (IC)	Land at Sandwich Road, Ash inc 99 Sandwich Road	<p>Total reps: 2</p> <p>Support limited development to the rear of the adjoining houses; Sandwich Road is a natural Boundary for the Village.</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>	<p>The site analysis form demonstrates that the Settlement Confines could be changed to include existing development, especially if LDF04 is allocated.</p>	<p>The site should not be allocated for development but the settlement confines should be changed to include land at 99 Sandwich Road and the neighbouring properties.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
NS05ASH (IC)	Corner site between Three Chimneys and Holly House, Moat Lane, Ash	<p>Total reps: 3</p> <p>Members of Ash Parish Council stated at their September 2010 meeting that they agreed that this derelict site should be included as being within the Village confines. The site is almost in the centre of the village - the main street and village church are only a few yards away.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. The site lies close to the junction of a number of Roman roads from Sandwich, Richborough and Woonesborough heading towards Canterbury. Roman cremation burials have been found close to this road junction to the east. St Nicholas' Church Ash incorporates Roman tile in its construction and it is reported that a Roman building has been previously identified on the church site. Development with archaeological measures may be possible on this site (KCC).</p>	The site analysis form demonstrates that the site is unsuitable for development due to poor access and having a detrimental impact on the setting of the Conservation Area and Listed Buildings. The site is also too small to allocate.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Aylesham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
AYL01 / SHL083 (IC)	Land to the north of Aylesham Local Plan Expansion Area	Total reps AYL01: 8 SHL083: 6 The provision of a further 500-1,000 dwellings would be appropriate in terms of the scale of the existing and proposed expansion to Aylesham and help support the viability of existing and new services and facilities.	The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape. Aylesham already has 1,000 dwellings allocated and this should be developed in the first instance before any further land is allocated.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
		Would have a detrimental effect on the surrounding countryside. Any development would be obvious from the B2046 and the railway. It would also present a quite unsuitable urban appearance to the neighbouring village of Adisham. The whole character of the northern edge of Aylesham would be changed. The addition of over a thousand more houses seems to us to be highly illogical. The land is of high agricultural value. (CPRE)		
		Not sustainable - few local jobs, road infrastructure is totally unsuitable. Narrow country road which is totally unsuitable for the existing amount of traffic- an additional 1100 on top of the 1200 already planned will place untenable demands on this already inadequate road. In addition, it would mean an enormous combined suburb for Aylesham of 2300 houses which is far too big for our village - it would irrevocably change the character of it. (Aylesham Parish Council)		
		The residential development would be confined to the lower, eastern part of the site, taking account of the Local Plan Inquiry Inspector's comments on the potential visual impact of development on this land. Residential development would be confined to some 15 hectares of land with open space/woodland provided on the remainder. Additional development would help reinforce the role of Aylesham.		
		Planning Inspector's report of July 1999, this site was refused. That development here would have a wide and adverse visual impact, a prominence increased during the winter months with illumination and loss of leaves from trees, and at the scale proposed would be wholly out of keeping with the land astride the B2046 the scale of development on the skyline would introduce an extensive and unacceptable change to the landscape quality of the land to the West. As there are few signs in the present or medium term economic climate to suggest employment opportunities commensurate with the 1200 houses already planned, let alone the indicated additional 1100 units. (CPRE)		

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Importance of retaining best and most valuable agricultural land. Draft proposals will impinge upon the adjoining countryside within the Canterbury District area. (CPRE)</p>		
		<p>Integration with the proposed Green Infrastructure Framework will enable a more robust allocation of sites with greater consideration of potential impacts on areas of biodiversity importance. This will help to secure the protection and enhancement of the green infrastructure network.</p> <p>Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies in an area that is rich in cropmarks. These cropmarks, which show evidence for buried archaeological landscapes, include enclosures, ring-ditches, field-systems and trackways. Finds from the area include prehistoric worked flint scatters, an Iron Age coin and early medieval brooch. Development should be avoided on parts of the site where significant cropmark concentrations lie. Pre-determination evaluation would be necessary to determine whether development is possible within other parts of the site. (KCC Strategy & Planning)</p>		
		<p>May result in negative impacts upon the setting of the Kent Downs AONB. Assessment of the proposals upon the AONB is undertaken if the site is to be taken further through the allocation process.</p>		

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	Total reps: 3 A number of sites in neighbouring Local Centres (Ash & Eastry), the Rural Service Centre of Sandwich and the District Centre of Deal have potential to impact on Worth. Planned local infrastructure provision is less than half required for the Adopted Core Strategy of 14,000 new homes in the district. If all the new homes already identified as required by the Medium Growth Strategy in the North of the district are developed, there is great concern that the A258 and local road network is not adequate to carry the anticipated increase in traffic without increasing danger to existing residents and road users. Further development to meet requirements of the High Growth Strategy demands major infrastructure improvements in the North of the District if it is to be sustainable (Worth Parish Council).	Kent Highways has actively been involved with the site selection process and have considered the impacts on the wider road network. No issues have been raised relating to the road infrastructure in the north of the district.	Noted
All Sites	Interim Consultation	Kent Wildlife Trust has no objections to the developments in principle as they are all located on agricultural land or semi improved grassland. However Eastry is situated within 2km of the Thanet coast to Sandwich bay the SPA of the same name being at around 4km distance. The sites are therefore the residents nearest coastal site. The developments proposed are all relatively sizable sites ranging from 35-174 houses. It is likely that the developments will have an impact on the above designated sites both individually and in-combination with other developments within Dover district and east Kent. This will need to be assessed through the strategic HRA process with appropriate avoidance mitigation and compensation measures formulated (Kent Wildlife Trust).	The District Council is working on a mitigation strategy for development throughout the District and this has been a consideration in the site selection process.	Noted
All Sites	Interim Consultation	Tipping point reached at 367 residents/ 150 units Growth would need to be picked up by Eastry branch site and Ash surgeries with Capital investment. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
LP002	Eastry Hospital	<p>Total reps: 7 CPRE support (CPRE)</p> <p>Max 40 dwellings unless significant road improvements are made. Will improve the look and feel of the village. (Eastry Parish Council)</p> <p>Foul sewer capacity assessments have indicated that there is capacity available to accommodate the proposed development at Eastry Hospital. (Southern Water)</p> <p>Should be a Transport Assessment. Reference is made to a threshold of 40 dwellings prior to off site highway works being required. Where has this figure emerged from. No reference to access in the options table under issues. (Kent Highway Services)</p> <p>The clause requiring development to preserve the Listed Building and its setting is welcome. Provision for archaeological evaluation and mitigation of the site is appropriate. (KCC Heritage & Conservation)</p>	<p>Since the consultation, there has been a resolution to grant planning permission for 80 dwellings together with offices. The issues raised have been considered as part of the planning application.</p>	<p>The site is covered by an existing saved policy in the 2002 Local Plan. Although the numbers in the planning application have risen, this policy is still relevant for future planning applications if they were to be submitted.</p> <p>??? Employment???</p>
EAS02M	The Pines, Thornton Lane	<p>Total reps: 2 Should be included for residential development.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to detrimental impact on the wider landscape and would introduce a hard urban edge to the rural setting of the village.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
EAS05	Land to the west of Gore Lane	<p>Total reps: 6 CPRE object.</p> <p>This site lies adjacent to the projected line of a Roman road. Provision should be made for a programme of archaeological works in advance of development of the site. (KCC Heritage & Conservation)</p>	<p>The site analysis form demonstrates that the site is suitable for development in principle for up to three units between the existing properties. The site is, however, too small to be allocated but could be included within a change to the Settlement Confines.</p>	<p>The site is considered to be suitable for limited residential development and the Settlement Confines should be changed to include the land and adjoining properties in the pre-submission local plan.</p>

Eastry

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>From the post office to the chemist there is only single lane traffic due to parking on one side of the road; The road is only 3.5m wide for approximately 30m.</p> <p>No footpath. Outside settlement confines; would adversely affect the rural character of Gore Lane; Large potential additions to the population of Eastry will create problems for primary school places and the already overstretched Doctors surgery.</p> <p>It is very close to adjoining listed properties and trees.</p> <p>We do not want our property (land) included in the site allocations document.</p>	<p>As the change to the confines is not an allocation, this does not mean that existing properties are expected to be redeveloped. The change would provide policy support if development proposals came forward.</p>	
SHL059	Land at Eastry Court Farm	<p>Total reps: 8 Will improve the look and feel of the village. The Parish Council (Eastry Parish Council)</p> <p>Re-use these agricultural buildings for suitable (B1) commercial purposes or for other farm diversification purposes. (CPRE)</p> <p>The Parish Council is in full agreement with this policy. (Eastry Parish Council)</p> <p>"Development is limited to the conversion of the existing traditional barns and through limited new build. To respect the character and quality of the site environs and historic environment;"</p> <p>Amendment sought to the boundary as shown on attached Map B.44(a).</p> <p>Include the existing site access onto Church Street</p>	<p>The site analysis form demonstrates that the site is suitable for limited development. The site is, however, extremely sensitive, being located on the edge of a rural village and adjacent to a Conservation Area. The Heritage Strategy should, therefore, be an initial reference for any development. It is proposed that the confines be amended and a policy drafted to ensure suitable development.</p> <p>Using the site for parking in addition to residential is not suitable due to the impact on the special character of the Conservation Area.</p>	<p>The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>This site has a very high potential for important remains associated with the Saxon development of Eastry. It is very important that provision is made for pre-determination evaluation works within the site area. (KCC Heritage & Conservation)</p> <p>This area is already getting crowded by residents cars and the main village car park is also usually full at busy times. That access is limited to Church Street.</p> <p>Must also include car-parking facilities for 60 cars. Parking in Church Street is very difficult.</p> <p>Provision of a new parking area on the site for visitors to the Church and Church Street residences.</p> <p>The poor state of the unadopted portions of road. Blend with the appearance of the Church St. conservation area.</p> <p>Farm should be cleared, enhanced and reinstated.</p> <p>Does not extend to include the established and mature boundary which presently exists in the North-East corner.</p> <p>Should encompass 1 & 2 Eastry Court Farm Cottages.</p>		
EAS02 (IC)	Interim Consultation Land at Eastry Court Farm	<p>Total reps: 2</p> <p>The access is of insufficient standard to withstand any additional units on the site; detrimental impact on the conservation area; will be visible from the A256 and have a detrimental impact on the landscape (Eastry Parish Council).</p> <p>The proposed allocation in the Preferred Options paper suggests an estimated capacity of 5 dwellings for the site because of the presence of Listed Buildings and a Conservation Area. Although the Church Commissioners do not wish to over-develop the site, we do not think that 5 dwellings is a justified number. We will be producing a Masterplan for the site.</p>		
		<p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL028	Land adjacent to Thornton Lane	Total reps: 5 Not subject to flooding. The site is accessible via an existing access. Existing residential use on the site. Previously developed land. Well located to the existing settlement of Eastry. Site is deliverable, available, suitable, achievable. The site is not constrained by environmental, conservation or ecological issues.	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on Listed Buildings and the wider landscape. Access is also poor.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	The access is unacceptable and the road network leading to the site would require substantial improvements. Development would have an unacceptable impact on the landscape (Eastry Parish Council). The site is a very large, partly backland site. Its development would result in a major expansion of the village into the countryside to the south west. It is some distance from existing facilities and services in the village. It is considered that development of the scale suggested would not be appropriate for Eastry in addition to the sites already identified.		
		Scale 1 Development of this site (or part of) should be avoided to Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Pre-determination evaluation would be necessary to determine whether development is possible within the site. Development on the site of the cemetery should be avoided (KCC).		
SHL094	Boystown Place	Total reps: 11 Could sympathetically developed to enhance the area. Could enhance the village's offer of houses and would not be out of character with its rural setting. Rough scrub with a few mature trees which could be incorporated into any design. The site and access to the nearest highway is owned by Dover District Council and would be developed in the short term. (Dover District Council)	The site analysis form demonstrates that the site is unsuitable for residential development due the loss of open space and tree coverage which contributes to the setting of the Conservation Area and Listed Buildings. This loss would also have a detrimental impact on the townscape in this area.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>This piece of amenity land gives a soft edge to the village; unacceptable impact on the street scene and a detrimental impact on the Conservation area and the adjacent listed buildings. The Council would like this site designated as open space (Eastry Parish Council).</p> <p>Adjacent to an SSSI; the site contains many trees providing habitat for wildlife; valuable village amenity; would provide a very hard edge to the village approach.</p> <p>An important 'green island' in the north part of the village.</p> <p>Should be dedicated inperpetuity as public open space; narrow road with a sharp incline.</p> <p>Increase in traffic in the heart of the village.</p> <p>Currently designated as open space.</p> <p>This part of the Boystown Place estate was left by the contractors as amenity land and passed to Eastry Rural District Council purely for maintenance.</p>		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		
SHL022	Land at Heronden Road	<p>Total reps: 5</p> <p>It is not easy to add new housing sites to the village of Eastry due to its existing unusual shape and topography. There will always be a degree of highway and other environmental concerns. However, the sites proposed seek to minimise these difficulties and put forward effective locations for sustainable development.</p>	<p>The site analysis form demonstrates that the site is unsuitable for residential development due to poor access and road network leading to the site and the detrimental impact on the wider landscape and Conservation Area.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Access would be difficult due to curvature of the road and the restriction on sight lines. Detrimental impact on the wider countryside and the Conservation area (Eastry Parish Council).</p> <p>It lies beyond the natural boundary to the settlement area.</p> <p>The site is considered to be poorly related to the main part of the village and is some distance from the village centre and the associated shops and facilities; development will result in an incursion of the village into the countryside to the south west.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies on the edge of the modern day village of Eastry. An early medieval cemetery lies to the south-west of the site and a Late Bronze Age or Early Iron Age pottery sherd has been found nearby. Development with archaeological measures may be possible on this site (KCC).</p>		
SHL024 (IC)	The Old Chalk Pit, Heronden Road	<p>Total reps: 5 Poor access, the immediate highway network is unsuitable due to a poor junction and narrow roads. Detrimental impact on the landscape and on the setting of Eastry (Eastry Parish Council).</p> <p>The site is considered to be poorly related to the main part of the village and is some distance from the village centre and the associated shops and facilities. The site is poorly related to the settlement boundary since it only adjoins development along part of its northern boundary.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies adjacent to an Old Chalk Pit which may partially extend into the site in question. An early medieval cemetery is recorded to the east of the site near Upper Cross Farm. Development with archaeological measures may be possible on this site (KCC).</p>	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on the wider landscape and poor access. This site is completely different in character to the adjacent former chalk pit site (see below) as it is on rising ground which is highly visible.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL025	The Old Chalk Pit, Heronden Road	Total reps: 6 It is not easy to add new housing sites to the village of Eastry due to its existing unusual shape and topography. There will always be a degree of highway and other environmental concerns. However, the sites proposed seek to minimise these difficulties and put forward effective locations for sustainable development. The existing business ceased trading in 2007 and there have been problems in letting the premises for business use.	The site analysis form demonstrates that the site is suitable in principle for residential development but as there is an existing freight business, development will be in the longer term. There are no Highway objections to the access as the site is currently being used for haulage.	The site is considered to be suitable for residential development in the longer term and should be allocated in the pre-submission local plan.
	Interim Consultation	Poor access, the immediate highway network is unsuitable due to a poor junction and narrow roads. Detrimental impact on the landscape and on the setting of Eastry (Eastry Parish Council). The site is considered to be poorly related to the main part of the village and is some distance from the village centre and the associated shops and facilities. Moreover, the site is poorly related to the settlement boundary since it only adjoins development along part of its northern boundary. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site largely lies within an old chalk pit which will have removed any archaeology that may have been present. The northern part of the site appears to have been unaffected by past quarrying. An early medieval cemetery is recorded to the east of the site near Upper Cross Farm. Development with archaeological measures may be possible on this site (KCC).	Although the site is located on the edge of the village, it is within walking distance to the nearest bus stop and the local school.	
SHL018	Land between Roman Road and Sandwich Road	Total reps: 3 Well related to the settlement confines and visually enclosed with adequate access to Woodnesborough Lane.	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on the Listed Building and rural character of this area.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	This will constitute an intrusion into the countryside and have a detrimental impact on the landscape (Eastry Parish Council). Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL064	Gore Field	Total reps: 11 Would not harm the character of the village. Would provide additional open space.	The site analysis form demonstrates that the site is suitable for residential development.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.
	Interim Consultation	<p>From the post office to the chemist there is only single lane traffic due to parking on one side of the road; The road is only 3.5m wide for approximately 30m.</p> <p>No footpath. Outside settlement confines; would adversely affect the rural character of Gore Lane; Large potential additions to the population of Eastry will create problems for primary school places and the already overstretched Doctors surgery.</p> <p>This will constitute an intrusion into the countryside and have a detrimental impact on the landscape. The road network leading to the site is unsuitable due to narrow roads (Eastry Parish Council).</p> <p>The school and local health services can't cope with the existing demand, there are limited local services and the bus service is unsuitable for improvement/increased service on its current route.</p> <p>Most school classes are oversubscribed; there does not appear to be any increases in the number of jobs being created in this area.</p>	Many of the issues raised through consultation can be mitigated or are concerns relating to the general principle of additional development in Eastry, which can also be mitigated.	
		<p>Would there be commitment to better provision services such as Broadband with these developments?</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. The site lies on the edge of the modern day village of Eastry. Whilst no archaeological finds are known from the site itself the general area has a good potential for Prehistoric, Romano-British and early medieval remains. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL053	Lower Gore Field, Gore Lane	<p>Total reps: 14</p> <p>Would not harm the character of the village. Would provide additional open space.</p>	<p>The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on the wider landscape and would result in poor urban design.</p>	<p>The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.</p>
	Interim Consultation	<p>Would affect the habitat of many wild birds and animals; taking away the rural aspect which is currently so attractive to many people; the road in Gore Lane is notorious for flooding even after a small amount of rain, often making the road impassable; the road is narrow.</p> <p>From the post office to the chemist there is only single lane traffic due to parking on one side of the road; The road is only 3.5m wide for approximately 30m.</p> <p>No footpath; Outside settlement confines; would adversely affect the rural character of Gore Lane; Large potential additions to the population of Eastry will create problems for primary school places and the already overstretched Doctors surgery.</p>		
		<p>This will constitute an intrusion into the countryside and have a detrimental impact on the landscape. The road network leading to the site is unsuitable due to narrow roads (Eastry Parish Council).</p> <p>The level of traffic is unsafe; inadequate road network.</p> <p>Intrusion into the countryside; Detrimental impact on the landscape particularly impacting on the conservation area and listed buildings. The road network leading to the site is unsuitable due to narrow roads therefore increasing the risk to road users which is already at an unacceptable level.</p> <p>The development of this site would result in the extension of ribbon development in a location some distance from the village centre and most of the village's services and facilities.</p> <p>There is no footpath apart from one small section.</p>		

Eastry

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		
NS01EAS (IC)	Land opposite Little Walton off Sandwich Road, Eastry	Total reps: 5 Development would have an unacceptable impact on the landscape and a detrimental impact on the Conservation area and the adjacent listed buildings (Eastry Parish Council). Within the village conservation area. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on the wider landscape and the setting of the Conservation Area and Listed Building.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NS02EAS (IC)	Land at Coronation Cottage, Mill Lane, Eastry	Total reps: 3 This site is currently an industrial area and the Council would like to see it protected as employment land (Eastry Parish Council). Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for residential development due to the loss of employment land. It is however, proposed that the settlement confines be changed to include the site so that if it can be demonstrated that it is not possible to retain employment it could be developed at a later date.	That the site be included within the settlement confines in the pre-submission local plan.
SHL027	Hammill Brickworks, Hammill Road	Should be allocated for either housing, employment or mixed use in recognition of its development potential.	The site is divorced from the settlement and would be contrary to Core Strategy Policy CP1	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	Objects to the wholesale development of this site for housing with the 172 homes indicated. It would, however, support the conversion of some of the existing buildings to keep their historic and architectural appearance intact. Continued use of the site for employment purposes would be acceptable (Woodnesborough Parish Council).		

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Goodnestone

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	Total reps: 1 Capacity provided for within new Aylesham Health Centre. Full range of Primary Care services in place and established as of 2009 - GP, Dentistry and Pharmacy. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
SHL030 (IC)	Site to the rear of Hospital Meadow Cottages, Park View Close, Goodnestone	Total reps: 2 Kent Wildlife Trust has no objection to development. However this site does contain woodland which although not ancient in origin is likely to contribute to the network of fragmented ancient woodland in the area and provide a stepping stone for the species which use this habitat. We recommend that a portion of this habitat be conserved within the development design (Kent Wildlife Trust). Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	Since these representations were made, a planning application has been granted for 8 dwellings which has been implemented. The issues raised during the consultation would have been considered as part of the planning application.	As the site has been granted planning permission and this has been implemented, the site is now no longer part of the Consideration for the Land Allocations Local Plan.
SAD32	Land at Yew Tree Farm, Boyes Lane.	(5) The site on the other side of Boyes Lane has proved that new development can fit comfortably into a village as attractive as Goodnestone. The development of this site, which is outside of the Conservation Area, will ameliorate the approach the village from the East. It is currently occupied by an unattractive and utilitarian former farm building. It has its' own established access is well screened from Boyes Lane and from The Street respectively by the contours of the land and Yew Tree Farmhouse and a period farm outbuilding. Using this site for residential development will reduce commercial vehicle movements through the village and the surrounding narrow lanes. In order for villages to survive, they need to evolve, and in the case of Goodnestone, it is our view that they also need to expand.	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact on the wider landscape and the setting of the designated heritage assets.	The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.
		1. Goodnestone is a very small village and the recent Fitzwalters development and the proposed Hospital Meadows estate will mean a significant increase in housing already. I think Goodnestone has already more than contributed its fair share to the County's "apparent" housing need. 2. The narrow lanes approaching the village, particularly Boyes Lane, would not be able to cope with additional traffic. 3. There is very little public transport and public amenities to support additional housing (or employment).		

Goodnestone

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>4. Parking in the village and around Boyes Lane is already restricted, particularly with the narrow lanes. 5. The proposed site is very natural and picturesque and further housing would not help the aesthetics of the village at all. 6. Does the village need more second home owners who disappear during the week? I disagree with some of the comments made in the comment supporting the proposal. The site is not well screened from Boyes Lane and there is no commercial vehicle movement from the Farm, the current site appears dis-used hence the request for redevelopment to provide further funds to the Fitzwalter's Estate</p>		

Great Mongeham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	Total reps: 2 Capacity within existing sites in Deal plus new surgery development scheduled for completion June 2011 in Sholden. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
MON04C	Mongeham Farm	Total reps: 6 Support. The inclusion of the derelict barn will allow for the removal of a safety hazard and an eyesore. CPRE Support. Mongeham Farm, Great Mongeham. Cherry Lane (part) from the junction with Northbourne Road to junction with Pixwell Lane, Great Mongeham. (CPRE) Development should be sympathetic to the Listed Building to the north of the site and the character of the Conservation Area. Iron Age / Roman remains lie to the west of the site. Development of the site should include provision for a programme of archaeological works. (KCC Heritage & Conservation).	The site analysis form demonstrates that the site is suitable for limited and sensitively designed residential development. It is proposed that the settlement confines are changed to include the site.	The site is considered to be suitable for limited residential development and the settlement confine changed to include the site in the pre-submission local plan.
LDF050	Stretch of Cherry Lane from the junction with Northbourne Rd to junction with Pixwell Lane	Total reps: 4 Support. The inclusion of existing properties, built some time ago in Cherry Lane, into the Village Confines makes sense (Map B50) CPRE Support. Mongeham Farm, Great Mongeham. Cherry Lane (part) from the junction with Northbourne Road to junction with Pixwell Lane, Great Mongeham. (CPRE) Development should be sympathetic to the Listed Building at Great Mongeham Farmhouse. A Roman settlement site lies just north of the proposal site. Development of the site should include provision for archaeological evaluation and mitigation measures. (KCC Heritage & Conservation)	The site analysis form demonstrates that part of the area identified should be included within the settlement confines to assist in redevelopment. The whole area is not considered to be suitable as this could have detrimental impact on the setting of the Listed Buildings, Conservation Area, and GI network.	Part of the suggested area is considered to be suitable for inclusion in settlement confine and should be included within the pre-submission local plan.

Great Mongeham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL007	Hillside Farm	Total reps: 4 Protect and enhance existing listed buildings and their setting and improve the character of the village overall.	The site analysis form demonstrates that the site is unsuitable for residential development due to poor access and the detrimental impact on the Conservation Area, Listed Buildings and wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	The site has poor access, development would have a detrimental impact on the conservation area and the near by listed building. The site is too far from the main populated centre of the Village (Great Mongeham Parish Council). Progressive dereliction of the existing farm buildings makes reuse of the farmyard for housing an attractive option within the existing walls. The farmhouse and garden should not be redeveloped. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. No archaeological remains have been recorded from within the site itself. An Iron Age and Romano-British settlement site is known to the west and finds of Roman, early medieval and medieval date have been made in the surrounding fields. The farm itself is shown on the first edition Ordnance Survey map and may be of local historic interest. Development with archaeological measures may be possible on this site (KCC).		
SAD03	Rear of 220 Mongeham Road	Total reps: 3 The site would create additional housing capacity without harming the character of the village.	The site analysis form demonstrates that the site is unsuitable for residential development due to the detrimental impact backland development on the Conservation Area and Listed Buildings.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

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Great Mongeham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>The site has no access, development would have a detrimental impact on the conservation area and the near by listed building (Great Mongeham Parish Council).</p> <p>Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
NS01MON (IC)	Land to the rear of Great Mongeham Farm, Pixwell Lane, Great Mongeham	<p>Total reps: 4</p> <p>The site would need to be accessed via Cherry lane, which is a very narrow road with poor visibility, Pixwell lane is also very narrow and would not be of sufficient standard to take the traffic associated with 11 home (Great Mongeham Parish Council).</p> <p>The site should be restricted within the established hedgelines.</p> <p>The site is poorly located in relation to the settlement boundary and in relation to existing development within the village; inappropriate incursion into the countryside; the village is already designated for a relatively significant level of development and further development of this scale would not be appropriate given the village's role and position within the District's settlement hierarchy.</p> <p>A large, redundant agricultural building; The existing barn is visually very prominent and no longer performs any useful agricultural purpose; redevelopment would result in the removal of a derelict and unsightly structure from the landscape.</p>	The site analysis form demonstrates that the site is unsuitable for residential development due to poor access and the detrimental impact on a Listed Buildings and on the wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

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Great Mongeham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>A Bat, Owl and Protected Species survey concluded that there were no signs of any bat or owl activity either recently or historically within the barn. The site is located close to the settlement confines of Great Mongeham. Located approximately 1.5km from the urban areas of Deal and Walmer; Accessed by several modes of transport including on foot, by bicycle, motor vehicle and bus. The anticipated traffic generated by the proposed use will be little more than that when it was operating as a farm, whilst the vehicles are likely to be smaller than those associated with farming and therefore far more suited to the local road system; Utilise the existing farm access to Pixwell Lane; the site is readily available.</p>		
		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		

Nonington

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendations
All Sites	Interim Consultation	The Trust has no objection to the development identified within this village (Kent Wildlife Trust).	Noted	Noted
All Sites	Interim Consultation	Nurse led service within village, plus additional capacity at Shepherdswell branch site. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted.
SHL015	Prima Windows, Easole Street	The site is currently used by Prima Systems Ltd who are looking to relocate and expand; Nonington as a village suitable to accommodate development; It would bring about substantial improvements to the appearance of the Listed Building; It would meet local demand for additional housing; It reinforces the role of Nonington as a village; Previously developed land.	The site analysis form demonstrates that the site is suitable for sensitively designed residential development.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.
	Interim Consultation	Support. The company needs to secure its future by finding an alternative location on a recognised industrial site and financing the relocation through redeveloping the factory for residential purposes. The existing use generates significant light and heavy vehicle movements and noise associated with the manufacturing process. These all have a significant impact on the village and on the immediate surrounding neighbours. Redevelopment would definitely improve the setting of the adjacent listed building and would involve the development of previously developed land. Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		
NON01V (IC)	Land off Vicarage Lane, Nonington	Total reps: 2 The site is poorly related to the village's settlement limits and existing development. Access is currently poor and there could be detrimental impacts upon nearby listed buildings and conservation areas. Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is unsuitable for residential development due to poor access and the detrimental impact on the Conservation Area, Listed Buildings and wider landscape.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Nonington

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendations
NS01NON (IC)	Land to the rear of Lynton, Mill Lane, Nonington	Total reps: 1 Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).	The site analysis form demonstrates that the site is, in principle, suitable for residential development. The site has also had a recent planning application granted for one dwelling.	The site is considered to be suitable for limited residential development and the settlement confine changed to include the site in the pre-submission local plan.
NS02NON (IC)	Land at Home Farm, Nonington	Total reps: 1 Impact would be minimal; would not impinge on the countryside character; it is deliverable immediately and without major infrastructure; would contribute to the health and vitality of the rural area.	The site is divorced from the settlement and so would be contrary to Core Strategy Policy CP1.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Northbourne

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
BET01	Barns at Homes Farm, Betteshanger	Total reps: 1 The intention would be to carry out a residential conversion of the barns, not to develop the whole site area with '53 to 71 dwellings' as per the statement in the Site Allocations document.	The site is divorced from the settlement which is classed as a hamlet (unsuitable for further development) and so would be contrary to Core Strategy Policy CP1.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
NOR01	Former Kent Salads Site, Northbourne	Total reps: 2 Seeking the inclusion of the existing industrial site in Northbourne (former Kent Salads Site) for a limited redevelopment, with regard to: Existing difficulties in securing inward investment. Difficulties attracting occupiers to the rural area. The cessation of an employment on the Northbourne site would consolidate the focus of employment provision on Betteshanger. Support the inclusion of Northbourne as a Hamlet.	The site is divorced from the settlement, which is classed as a 'hamlet' (unsuitable for further development), and so would be contrary to Core Strategy Policy CP1.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	Brownfield site in a sustainable location with good access to community facilities and public transport; deliverable in 6-10 years.		
SHL041	Land formerly occupied by White Horse Public House, The Street, Finglesham	Total reps: 2 Previously developed site. Would provide much needed new housing for Finglesham. Would provide accommodation for the workforce of the nearby industrial land. Helps to support village facilities such as the local shop, the pub and the local bus services.	The site is divorced from the settlement, which is classed as a hamlet (unsuitable for further development), and so would be contrary to Core Strategy Policy CP1.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	Welcome housing development in this area but the proposed density is completely out of keeping with the rest of the dwellings in Finglesham, 12 dph would be more in keeping with the village.		

Preston

Site Code	Address	Issues Raised from Consultation	Site Analysis and SHLAA Work	Consideration for Inclusion
General	Preston	<p>1) Preston Parish Plan concluded that some future development in Preston was vital for the long term survival of the village.</p> <p>2) Work undertaken by the Village Design Statement team also identified a suprisingly high level of residents and non-residents who are currently employed within the Parish.</p> <p>3) Regard it as essential to retain and strengthen the village school, the retail shops and a diversity of local employment opportunities and also to promote the creation of new rural based businessse and appropriate diversification.</p> <p>4) Propoportinate scale of new housing would reinforce the village's role and enable young families and young adults with skills to join and contribute to a sustainable and thriving village community.</p> <p>5) Can only be determined once a Housing Needs Surbey has been undertaken.</p>	<p>Whilst the District council supports some development at Preston, no suitable sites have been suggested.</p> <p>At the time of the Preferred Options consultation in 2008, the District Council only assessed two sites in Preston for residential development, land to the west of Grove House, Grove Way (PRE01) and land north of Preston Primary School (PRE02).</p> <p>The latter has since been designated as a village green and this has now been withdrawn from the process.</p> <p>No alternative sites have been idetified by the Parish at the preferred options stage. The Parish Council is now in the process of considering sites following their 'call for sites'.</p> <p>Any sites will need to be submitted as part of the public participation on the Land Allocations Local Plan.</p>	<p>There are no suitable sites to include at this stage in the process.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	Total reps: 2 The Trust has no objection to the development identified within this village (Kent Wildlife Trust).	Noted	Noted
All Sites	Interim Consultation	Tipping point reached at 367 residents / 150 units Growth would need to be picked up by Eastry branch site and Ash surgeries with Capital investment. (NHS Eastern & Coastal PCT)	The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.	Noted
SHL008	Land north of Lower Road and East of Durlock Road	Total reps: 5 The land is 20% Grade 1, 65% Grade 2 and 15% Grade 3a. The land has not been used for food production for 30 years being no longer viable. Access would be from Lower Road. Six to ten would be sufficient on this site. Development can be designed similar to the Listed Buildings to blend with them.	The site analysis form demonstrates that the site is unsuitable for development as this would detract from the open rural setting of the Listed Building and have a detrimental impact on the wider landscape.	The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	Development of the site would be detrimental to the setting of the listed buildings and have a detrimental impact on the wider landscape; it lies outside the settlement confines; Nevertheless, a few houses fronting on to Durlock Road, and designed taking into account the nature of other buildings in the immediate vicinity, could be acceptable (Staple Parish Council). Development of the site would be detrimental to the setting of the nearby listed building and would adversely impact on the wider landscape. Limited range of services and facilities in the village. Grade 1 agricultural land; Flood Zone 3; Jubilee Road is a narrow road with a bus stop near to the entrance to the site and another one opposite.		
		Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval to Scale 5. Development with archaeological measures may be possible on this site (KCC).		

Staple

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL092	Mill Road	<p>Total reps: 4</p> <p>Area around the Village Hall at Mill Road suitable for development of small to medium scale housing.</p> <p>Staple is in danger of becoming two separate communities.</p> <p>“suitable for a scale of development that would reinforce its role...”, an influx of families to this area would provide for this and would also support local rural school.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to a poor access, no footways, is divorced from the main settlement and would have a detrimental impact on the wider landscape.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>
	Interim Consultation	<p>185 homes would in effect be a satellite village in its own right, with no real connectivity to the centre of Staple and current public transport. The area is bounded on one side by Buckland Lane, a narrow single carriageway country lane with passing places, and on the other side by Mill Road, a slightly wider single carriageway country lane. However, the only logical access route to the area is from the junction of The Street and School Lane via Mill Road where existing buildings limit the width of the road to approximately 3.3m; the added traffic would make an already difficult junction extremely dangerous (Staple Parish Council).</p> <p>The site is poorly related to the village and its settlement limits. Limited range of services and facilities in the village.</p>		
		<p>Scale 5 No known archaeological potential on the site or part of it. Given the size of the proposed site it is possible that presently unknown archaeological remains may be present within the site. (KCC).</p>		

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
SHL067(IC)	Mill Road	<p>Total reps: 4 SHL067 - is included in SHL092, but foresees a fewer number of homes (63). Essentially, it would pose the same traffic and access problems as those for SHL092 (Staple Parish Council).</p> <p>The site is poorly related to the village and its settlement limits; limited range of services and facilities in the village.</p> <p>My property has been included in a plan of agricultural land around me. This land has been put forward for development I believe but I have no intentions of selling my property and would appreciate some explanation please.</p> <p>Scale 5 No known archaeological potential on the site or part of it. Given the size of the proposed site it is possible that presently unknown archaeological remains may be present within the site (KCC).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to a poor access, no footways, is divorced from the main settlement and would have a detrimental impact on the wider landscape</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>

Wingham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	<p>Total reps: 2</p> <p>We have no objections to development on any of the sites identified within Wingham (Kent Wildlife Trust).</p> <p>Capacity within Wingham supported by main surgery site at Aylesham (NHS Eastern and Coastal Kent).</p>	Noted	Noted
WIN04	Land to the north of White Lodge, Preston Hill	<p>Total reps: 4</p> <p>Bolstering the vitality and viability of the village. The facilities currently available in the area are sustained.</p> <p>CPRE support. (CPRE Kent)</p> <p>This site lies in an area of general background potential with Iron Age remains known to the west. Provision should be made for a programme of archaeological works in advance of development of the site. (KCC Heritage & Conservation)</p> <p>Already built upon.</p> <p>The site is on a dominant ridge, and is therefore visible for many miles impacting upon the character and perception of the village. Extends strip development of the village rather than focusing on development of the core.</p> <p>Would inevitably lead to further traffic pressure. (Wingham Parish Council)</p>	<p>The site analysis form demonstrates that a change of confines to include this site would be unsuitable as development would have an unacceptable urbanising effect on the area and intensify ribbon development beyond the physical confines of the village.</p>	<p>The site is not suitable for development and the settlement confines should not be changed in the pre-submission local plan.</p>

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
LDF033/SHL003	Land adjacent Wingham Primary School, (Lady Hawarden site)	<p>LDF033 Total reps: 4 SHL003: 5 CPRE object (loss of trees and local amenity value; impact on conservation area; potential access issues). (CPRE Kent)</p> <p>Although would like to see a change to the proposed boundary to development.</p> <p>Recognise the sensitive nature of the site and the surrounding built environment and mature trees across the site and, consider that, even with the extended boundary, a limited residential development would be appropriate to the environs.</p> <p>Adjacent to a Scheduled Roman villa site and the medieval college, this site is archaeologically sensitive. Any proposals for development of this site should be accompanied by an assessment of the potential archaeological effects of the development, which should include an archaeological field evaluation. The setting and amenity of the Scheduled Monument and the Listed Buildings to the north should be considered for any application at this site. (KCC Heritage & Conservation)</p>	<p>The site analysis form demonstrates that, as the site is in a sensitive location, it is only likely to provide a development of less than five units. It is, therefore, unsuitable to allocate the site for development.</p>	<p>As the site is only likely to provide development of less than five units, it is not considered suitable to allocate this site for development. The site remains within the confines and proposals can be considered through the Development Management process.</p>
		<p>Site of an Ancient Monument and is a scheduled Ancient Monument Conservation Area, and therefore ought not to be considered for development. (Wingham Parish Council)</p>		
	Interim Consultation	<p>Access would be onto a corner on the A257 which is subject to frequent traffic accidents (Wingham Parish Council).</p> <p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. Any development within the Scheduled Monument of Wingham Roman Villa would require consent from the Secretary of State. It is possible that outlying remains associated with the villa centre or the early medieval and medieval development of Wingham may be present and pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
WIN02C	Land north of College Way	Total reps: 3 CPRE Support. (CPRE Kent) Potential of this area is unknown. (KCC Heritage & Conservation) More detail is required concerning how development will impact on the safety and flow of traffic through the village. (Wingham Parish Council)	The site analysis form demonstrates that, in principle, a change of confines is suitable to allow for one or two dwellings.	The change of confine is considered to be suitable and should be changed in the pre-submission local plan.
WIN02/SHL010	Builders Yard, High Street	WIN02 Total reps: 3 SHL010: 7 The site lies to the rear of the medieval high street. Archaeological measures may be appropriate for development of this site. (KCC Heritage & Conservation) It is my understanding that Rural Housing Trust says that there is a demand for affordable housing within the Wingham. The Builder's Yard is adjacent to the current existing affordable housing at Jasmine Place and Miles Court in Wingham. More detail is required concerning how development will impact on the safety and flow of traffic through the village. (Wingham Parish Council)	The site analysis form demonstrates that the whole site is unsuitable for development due to access, loss of trees & biodiversity habitat and would have a detrimental impact on the Conservation Area and wider landscape. Part of the site is also within a flood risk area. The analysis form does, however, demonstrate that a development of less than five units may be possible where there is existing development.	A change of confine is considered suitable for a small part of the site to allow limited development and this should be included within the pre-submission local plan.
		The access to this site is very poor; on a flood plain (Wingham Parish Council). Poorly related to the settlement boundary and existing development; inappropriate incursion into the countryside; partly adjacent to the village conservation area. This site lies adjacent to the Wingham River and is highlighted as High Risk in the SFRA. The proximity to the watercourse and risk of flooding are likely to constrain development. A detailed FRA will be required to determine if the site is suitable for development. The Wingham River is a failing waterbody (Poor Status). There is the need to consider the potential for development to have adverse effects on water quality and status of the river in the future. It is suggested that SUDS rather than direct discharges should be specified in planning conditions (Environment Agency).		

Wingham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>KLIS shows this site as containing some woodland. Some of this habitat should be preserved within the development (Kent Wildlife Trust).</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		
SHL061	Wingham Engineering Works, Goodnestone Road	<p>Total reps: 3</p> <p>Wingham is a substantial village, with a wide range of facilities, and good transport accessibility; Mixed use redevelopment would secure the long term employment future of the site; Brownfield sites; Within easy walking or cycling distance of village facilities and public transport;</p> <p>Would provide further support for existing village facilities; Opposite the recreation ground.</p> <p>Environmental enhancement, through replacement of the existing buildings.</p>	<p>The site analysis form demonstrates that the site is unsuitable for development as there are doubts about the compatibility of residential development with industrial uses. There would also be a loss of employment land.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>
	Interim Consultation	<p>The site is poorly related to the existing settlement boundary and existing residential development and is also some distance from existing services and facilities within the village. Its development would result in the loss / relocation of an important local employer.</p> <p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval to Scale 4 Low level archaeology anticipated which could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		

Wingham

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
NS01WIN (IC)	Land at Gobery Hill, Wingham	<p>Total reps: 4</p> <p>This is a very elevated site and development here would be over prominent. The access to the site would be via the main A257 which already experiences problems with speeding traffic at this location (Wingham Parish Council).</p> <p>The site is poorly related to the settlement boundary; inappropriate incursion into the countryside; partly adjacent to the village conservation area.</p> <p>Shown to be at risk in SFRA. The Wingham River is a failing waterbody (Poor Status). There is the need to consider the potential for development to have adverse effects on water quality and status of the river in the future. Should development occur here, then, among other things, it is suggested that SUDS rather than direct discharges should be specified in planning conditions (Environment Agency).</p>	<p>The site analysis form demonstrates that the site is unsuitable for development due to the detrimental impact on the wider landscape and setting of the village and Conservation Area.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>
		<p>Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).</p>		

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
All Sites	Interim Consultation	<p>Total reps: 1</p> <p>Tipping point reached at approx. 367 residents / 150 units. Capital investment would be required to provide capacity at one of two surgery sites. Need to consider impact of all Sandwich locality developments (NHS Eastern and Coastal Kent).</p> <p>The Trust has no objection in principle to the development identified for this village (KWT).</p>	<p>The need for social infrastructure has been identified in the CS. Individual requirements can be addressed through S106 or CIL.</p>	Noted
LDF02	Land at Sandwich Road	<p>Total reps: 43</p> <p>The whole of the site may be seen as outside the village.</p> <p>Ribbon development along the flat section of the Sandwich Road is acknowledged to be inappropriate and of a type that would no longer be permitted.</p> <p>Eats in to the flat, fertile plane which forms the unique setting of Sandwich and which differentiates Sandwich from Woodnesborough and the other surrounding villages.</p> <p>The number of homes would change the balance of the village leaving its traditional centre, the church, more isolated from the bulk of the population.</p> <p>Site is likely to be developed as an estate with its own access road rather than the traditional development in the village of a series of turnings each leading to a small group of houses.</p> <p>The village is characterised by its variety.</p> <p>The bus frequency outside school hours makes it unsuitable for travel to work or for regular shopping.</p> <p>There is scope within the village for incremental growth.</p>	<p>The site analysis form demonstrates that, in principle, frontage development would be suitable as this would, together with landscaping, not impact on the wider landscape. This would be likely to be fewer dwellings than the 37 stated. The site analysis form also considers the issues of the impact of development on the village, local facilities, access, footpaths, public transport and the historic environment. The LDF PAG has however, indicated a preference to an alternative site.</p> <p>The remaining issues raised through consultation are not site specific issues; the issues relate to the general principle of development in Woodnesborough.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>

Woodnesborough

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Prime agricultural land. People move to the countryside for a rural outlook and open spaces - and pay higher house prices because of it.</p> <p>Road access onto a dangerous road; Excess traffic; Development on the edge of the village would spoil the setting; Loss of views; Lack of facilities, we have lost our pub, shop and post office.</p> <p>Noise and fumes; Block out light; Building 1.5 miles away from shops, schools, Doctors etc.</p> <p>Need a buffer zone/landscaping.</p> <p>Lack of local facilities resulting in increased traffic flow; Destruction of arable land.</p> <p>Public transport cannot serve many elderly people; Loss of prime agricultural land with some important archaeological connections; Ribbon development.</p>		

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Would seriously alter the character of the village; Become part of urban Sandwich.</p> <p>The site is grade 1 farming land; Increased traffic congestion.</p> <p>An unsafe route for children to walk to school. The road network in Sandwich is not capable of accommodating the increase in traffic; There is no provision to expand local schools. Both senior schools are already heavily over subscribed; The existing GP premises in Sandwich are unable to accommodate an increase in GPs; Increased flood risk to the area; The impact of surface water drainage; Extra demand for household water with no provision for additional reservoirs; The sewerage system struggles to cope with the existing properties; There is no shop/post office in the village since it's closure earlier this year.</p> <p>The policy states that there should be provision of a village hall. This would mean duplication of an existing facility in the village.</p>		

Woodnesborough

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Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>There is insufficient space for 37 units - the density is too great.</p> <p>CPRE would support a frontage development on this site at Sandwich Road, Woodnesborough, but consider that 37 dwellings is optimistic with around 20 dwellings being a more realistic yield. We strongly support the proposal to include a new village hall as part of the development. (CPRE Kent)</p> <p>It does not benefit from good quality highway links.</p> <p>Foul sewer capacity assessments have indicated that there is no capacity to accommodate the proposed development at Sandwich Road, Woodnesborough. To reflect this current position we propose an additional point to be added to policy SA34 to offer information and early warning to developers as to the requirements of the site. (Southern Water)</p> <p>Some sites have estimated capacity and issues which do not reflect highway concerns, such as: Sandwich Road, Woodnesborough. There would be requirement for a footway along the frontage especially if a Village hall was to be provided as part of the development. This is not referred to in options or Policy SA34. (Kent Highway Services)</p>		
		<p>The site lies across the projected line of a Roman road between Woodnesborough and Sandwich and north of a medieval moated site at Grove Manor which is a Scheduled Monument. Any proposals for development of this site should be accompanied by an assessment of the potential archaeological effects of the development, which should include an archaeological field evaluation. The setting and amenity of the Scheduled Monument should be considered for any application at this site. (KCC Heritage & Conservation)</p> <p>Obscuring view as building on the green belt land and de-valuation of property.</p> <p>Increase of pollution because of an increased car use.</p>		

Woodnesborough

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Disruption/removal of birds/wildlife in the ancient hedgerows surrounding the proposed building site.</p> <p>To encourage the concept of linking the gain of a village hall plus community shop/facility with this village expansion.</p> <p>Lack of new jobs; employment being low in this area; Lack of parking.</p> <p>John Durban has given land free for a new village hall on the understanding that he can have planning permission to build his housing development; The new village hall should be built centre to top of the village where most of Woodnesborough's population live as it would be much safer to get to.</p> <p>Woodnesborough present village hall is adequate.</p> <p>Support for a new village hall and playing fields.</p> <p>This development will lead to further development on Sandwich Road which will lead to transformation of Woodnesborough into a Suburb of Sandwich and will be no longer our Village.</p> <p>Between Melville Lea to Clearbrook House and Caterways to woodlands there is not kerbside walkway.</p>		

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Woodnesborough

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>The members do not feel it is possible to build a Village Hall and 37 properties along the front of this property; Parking problems are a real concern; A small estate would be a more sympathetic use of the site; Any Village Hall should be located away from the frontage and screened to prevent disturbance to local residents and to give sufficient off road parking facilities for the use of the village hall. Members would like to see some amenity space associated with the Village Hall. (Woodnesborough Parish Council)</p> <p>Limited bus service to Sandwich (once an hour); The road does not have a pavement.</p> <p>The policy needs to provide for the residential redevelopment of the existing village hall as part of the scheme.</p> <p>The Street/Sandwich Road/Woodnesborough Road is already a rat run; parking on both sides; There are no amenities in the village since closure of the post office/shop.</p>		
WOO03	Woodash Garage site, Hammill Road	<p>Total reps: 2 PDL.</p> <p>The owner of the site is nearing retirement age and wishes to cease trading.</p> <p>Suitable development would improve the setting of the village and the adjacent Listed Buildings.</p> <p>This site is currently in a very rundown state, and it is unlikely the business will remain open for much longer. A small development of 5-8 properties would benefit the local community and still be in keeping with the street scene. Some additional housing would not be out of keeping with the street scene. (Woodnesborough Parish Council)</p>	<p>The site is divorced from the settlement and would be contrary to Core Strategy Policy CP1. The garage appears to be under new ownership and has been refurbished.</p>	<p>The site is not considered to be suitable for residential development and should not be allocated in the pre-submission local plan.</p>

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Woodnesborough

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
LDF03 / WOO02 / SHL093	Laslett's Yard, Beacon Lane. Land on junction of Marshborough Road and Beacon Lane (Laslett's Yard). Land adjoining Laslett's Yard, Beacon Lane.	LDF03 Total reps: 4 WOO02: 5 SHL093: 8 If Laslett's Yard is developed, Marshborough Road should be diverted to go due south from the north corner to Beacon Lane and make the junction safer. CPRE support. (CPRE Kent) The site can be brought forward at an early stage for development. The identified negative effects in the Sustainability Report (Volume 2) for this site are not a barrier to allocation and development.	The site analysis form demonstrates that in principle the site is suitable for development.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.
LDF03	Laslett's Yard, Beacon Lane.	This site lies in an area of archaeological potential associated with the route of a Roman road to Beacon Hill. This road follows the line of Marshborough Road and flanks the site. The historic core of Woodnesborough lies just south and includes St Mary's Church which has Norman origins and the site of 'The Mount' a probable Early Medieval burial site. Provision should be made for a programme of archaeological works in advance of development of the site. (KCC Heritage & Conservation)	Noted.	Include issue within policy.
SHL093	Land adjoining Laslett's Yard, Beacon Lane	The site would accord with PPS7; The open land is openly cultivated as 'hobby farming' and does not form part of a larger land holding. The land would not, therefore, constitute grade 1 agricultural land; Greenfield land needs to be brought forward to assist in sustaining and strengthening rural communities.	The site analysis form demonstrates that in principle the site is suitable for development.	The site is considered to be suitable for residential development and should be allocated in the pre-submission local plan.

Woodnesborough

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Further residential development as sought will not intrude into the open countryside surrounding the village. Suitable for development as an 'infill' site.</p> <p>The Parish Council strongly supports development on this site. It believes that adding this site to LDF03 will allow a good safe access to be provided. The business on the site has closed down as it was not economically viable and the Members feel a sympathetic developing of the site will improve the visual impact of the area (Woodnesborough Parish Council).</p>		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		
SHL021	Woodnesborough Nurseries, Sandwich Road	<p>Total reps: 5 Access onto Woodnesborough Road. This site access could be provided with a 'mini roundabout' on the Sandwich Road that would naturally slow the traffic through the village. Further development on this property would enhance the neighbourhood. Woodnesborough Nurseries ceased production in 2003. Southern Water Public Sewer crosses this site This site has a public footpath from Woodnesborough Road. It is fully screened from outside. The site is above the flood plain. Utilities of Gas, Electricity and Water are all available on site.</p>	The site analysis form demonstrates that the site is unsuitable for development due poor access and a detrimental impact on Listed Buildings and a Scheduled Monument.	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
	Interim Consultation	<p>Inappropriate incursion into the countryside; would also require the relocation of an existing local employer; limited services and facilities within walking distance.</p> <p>Access is on a bend in a busy road, with impaired sight lines; density of dwellings is out of keeping with any previous development in the village; in the vicinity of an ancient monument and Roman road.</p> <p>In-combination impacts on the Thanet Coast and Sandwich Bay Ramsar site will need to be considered if SHLO21 is developed (KWT).</p>		
		Scale 3 Significant archaeology could be dealt with through suitable conditions on a planning approval. Development with archaeological measures may be possible on this site (KCC).		
WOO04	Land at Fleming Road	<p>Total reps: 1</p> <p>The land is too small for any agricultural or industrial use. It has its own road entrance, telephone, water and electricity supplies. It has no useful commercial purpose.</p>	The site is divorced from the settlement and would be contrary to Core Strategy Policy CP1	The site is considered to be unsuitable for residential development and should not be allocated in the pre-submission local plan.
	Interim Consultation	No objections to this site being developed (Woodnesborough Parish Council).		
SHLO48 (IC)	Land between Stoneleigh and Nine Acres, The Street, Woodnesborough	<p>Total reps: 4</p> <p>The Council strongly supports some development on this site though is concerned about the number of units proposed. Building on this site would be highly beneficial in bringing together the two parts of the village allowing it to grow and develop a character that would be more sustainable for the future. The provision of a new Village Hall on this site or on adjacent land would also be of great advantage Woodnesborough Parish Council).</p> <p>Would result in an extension of ribbon development within the village. The village has relatively limited services and facilities within walking distance.</p>	The site analysis form raises concerns with regard to changing the character of the village through the loss of open space between the built form and a detrimental impact on the setting of the village, Listed Building and the wider landscape. However, these issues could be mitigated and a scheme could bring further benefits to the village as it could include a new village hall.	The site is considered suitable for residential development (with village hall) and should be allocated in the pre-submission local plan.

Site Code	Address	Issues Raised from Consultation	Consideration of Issues	Recommendation
		<p>Support. Highway consultants concluded the provision of a footpath to the site frontage would both improve pedestrian safety and allow the required visibility splays. Architects were instructed to assess how the site might be developed. This work has shown that the indicative site capacity is reduced slightly as a linear pattern of housing set back from the road was the most appropriate design response to retain the existing site frontage and limit the visual impact of development. In other directions the see is well contained by the surrounding topography. The site is more central and is a more favourable location for a mixed use site comprising housing and a community facility than the more peripheral (preferred site) land at the edge of the village originally identified by Dover DC. Promotional work that has been undertaken since the call for sites and the support by the Parish Council creates a powerful case for the land to be selected as the "preferred allocation" for the village.</p>		
299		<p>Scale 2 Pre-determination assessment should be carried out to clarify whether development of any part of the site is possible. The site lies at the branch of the Roman road from Dover, with one branch heading to the north-west towards Ash and Richborough and a second branch heading to the north-east towards Sandwich. A flat-topped mound known as 'The Mount' is recorded at this road junction This is believed to have been the location of a very important Anglo-Saxon grave that was excavated in the 1840s and other Anglo-Saxon burials have been found in association with the mound. Pre-determination evaluation would be necessary to determine whether development is possible within the site (KCC).</p>		



**Appendix 1
Representations Summary Tables
Preferred Options Protected Open Space Amendments**

**Planning Advisory Group
13th September 2012**

**Cabinet
1st October 2012**

Protected Open Space Map Amendments from Preferred Options Stage

Map Number	Person ID	Full Name	Organisation Details	Representation Type	Representation	Council's Response	Proposed Changes
General	301	Miss Karen Banks	RJ Barwick and Sons Ltd	Objection	Objection to paragraph 9.106. The revisions to the Proposals Map, proposing the retention, omission and revisions to areas of open space should undergo proper public consultation and examination. In this regard, the 'extensive research into the District's open space (paragraph) as required by PPG17, would not appear available for public scrutiny.	The proposed changes were subject to consultation in 2008. Explanation of the rationale behind the proposed changes is provided in the Land Allocation Pre-Submission Local Plan and that document will be subject to examination. The detailed audit of open spaces will be subject to public consultation as part of the revised Parks and Open Spaces strategy.	Add text to the LAPSLP regarding the reasoning behind proposed changes. Ensure that the open space audit is included in consultation on the revised Parks and Open Spaces strategy.
B41	544		St Margarets Bows and Social Club	Objection	The Bows Club and its landlords the Parish Council hope to sell the Kingsdown Road Bows Club site for development in order to fund a new green and club building elsewhere in the village. Negotiations with the Planning Department regarding this project have been ongoing since 2004 and both the Bows club and the Parish Council have spent considerable amounts of money in its furtherance. The possibility that 'Open Space' can be substituted for another piece of land is no comfort as the designation of the Bows Green as an Open Space will undoubtedly kill developer interest. We therefore ask you to withdraw this proposal with immediate effect.	The bowls club site is a publicly accessible open space, and forms part of the existing network of green infrastructure. As such, designation of the site is in accordance with policies CP7 and DM25 of the Core Strategy. In addition, a recent application (12/0622) has been received from St. Margaret's Bows Club for the erection of single storey side and rear extensions to the club house, so presumably the club now wishes to remain at its current location.	None
B41	338	Walter H. Boehling		Objection	The Bows Club and its landlords the Parish Council hope to sell the Kingsdown Road Bows Club site for development in order to fund a new green and club building elsewhere in the village. The current open space allocation will undoubtedly kill developer interest. Therefore please remove the Kingsdown Road Bows Club from the open space designation.	The bowls club site is a publicly accessible open space, and forms part of the existing network of green infrastructure. As such designation of the site is in accordance with policies CP7 and DM25 of the Core Strategy. In addition, a recent application (12/0622) has been received from St. Margaret's Bows Club for the erection of single storey side and rear extensions to the club house, so presumably the club now wishes to remain at its current location.	None
B41		Jane Cook (Clerk to the Parish Council)	St Margaret's at Cliffe Parish Council	Objection	The Parish Council believes it is sensible to add protection to the plot of land at the end of Slisbury Road, previously the subject of a planning application in October 2005 (DOV/05/011146). Could this be designated as a 'Designated Open Space' in order to prevent further planning proposals?	This site lies within an Area of Outstanding Natural Beauty and is identified as semi-natural chalk grassland; a priority habitat under Natural Environment and Rural Communities Act 2006. As the site is protected by national legislation it is not appropriate for designation as protected open space on the District's Proposal Map. Application 05/01146 was dismissed on appeal. Furthermore, the suitability of site for development is considered as part of SAD28 and it is not recommended for inclusion in the Submission Document.	None



**Appendix 2
Executive Summary
Retail & Employment Update**

**Planning Advisory Group
13th September 2012**

**Cabinet
1st October 2012**

RETAIL UPDATE EXECUTIVE SUMMARY

Strategic Perspectives (SP) was commissioned by Dover District Council in May 2012 to produce an updated Retail Study for the District, taking into account and updating the previous 2007 Retail Need Assessment Study (RNAS) prepared by Kent County Council and various updates in 2007 and 2008.

This study has been prepared in the context of current and emerging national and development plan policy guidance. It specifically takes into account the advice set out in the National Planning Policy Framework (NPPF) published in March 2012. The study approach has also been informed by other key material considerations, including the *Practice Guidance on Need, Impact and the Sequential Approach* (the 'Practice Guidance').

The study is informed by a combination of desk-top and primary research including

- the commissioning of a household telephone interview survey (HTIS) to help establish current shopping patterns and expenditure;
- an assessment of existing retail provision in the District;
- a detailed market share analysis of convenience and comparison goods expenditure; and
- an economic/quantitative capacity assessment for both convenience goods and comparison goods floorspace up to 2026 (and 2031).

In terms of current shopping patterns for convenience goods (food), the survey evidence shows that all the District's main centres and stores are retaining a relatively high proportion (76.3%) of shopping trips and expenditure across the study area. There is a particularly high retention rate in the Dover (94.7%) and Deal (94.7%) defined primary catchment areas (PCA). Sandwich retains slightly less convenience goods expenditure (65.1%) and this is mainly due to the attraction of convenience (and comparison goods) shopping provision in Westwood Cross, Canterbury and Folkestone. There is also a reasonable district-wide retention rate in Zone 7 (47.0%) and Zone 8 (26.6%), bearing in mind the attraction and proximity of facilities outside of the District. Compared to the results of the 2007 RNAS, the 2012 market share assessment shows that the overall retention of convenience goods shopping in the District has increased from 73.7% in 2007 to 76.3% in 2012.

For comparison goods the 2012 market share assessment shows that 44.5% of all expenditure is retained by stores and centres within the District. This is an improvement from the 38.2% retention recorded in 2007. Within Dover's PCA, "in centre" shops and facilities attract the majority of comparison goods expenditure across different categories of comparison goods expenditure. "In centre" destinations also attract a reasonable share

of comparison goods expenditure across all other zones in the study area (ranging from 3.7% in Zone 6 to 16.6% in Zone 3). In contrast "out of centre" destinations in Dover account for 13.4% of all comparison goods expenditure across the study area and only achieve a higher market share than the town centre in the sub-categories of DIY, gardening and CDs/DVDs.

Deal and Sandwich centres account for 11.6% and 1.7% of total comparison goods respectively across the study area as a whole. Sandwich Rural Service Centre has a limited role in retaining comparison goods expenditure, and accounts for less than 2% of all comparison goods expenditure across the study area. This is consistent with its role within the retail hierarchy.

Overall, comparison goods expenditure attracted to centres and stores outside of the District is mostly captured by Canterbury (27.2%), Westwood Cross (12.4%) and Folkestone (10.4%). As expected, the 'leakage' of shopping trips and expenditure is higher around the periphery of the study area (particularly in Zones 6-8).

Whilst the District's smaller centres have a much more limited draw for both main food and comparison goods shopping, they are important destinations for more frequent top-up food shopping and meeting the day-to-day needs of their local catchment populations.

The results of the market share analysis were used to inform the retail capacity assessments for both convenience and comparison goods floorspace. These assessments are informed by and take into account various key assumptions and forecasts including, *inter alia*,

- baseline population levels and population growth forecasts;
- expenditure per capita levels and forecasts;
- an allowance for special forms of trading (including Internet shopping);
- existing floorspace and 'benchmark' turnover levels;
- an allowance for the growth in floorspace 'productivity';
- planned housing growth; and
- existing retail commitments and strategic allocations.

The updated **convenience goods** retail assessment forecasts no capacity for new retail floorspace across the District up to 2026. This is explained by the significant new planned retail commitments (such as the St. James Development) and strategic allocations identified by the local planning authority in Dover Urban Area. To be consistent with the Core Strategy, the study distributes floorspace requirements between Dover, Deal/Sandwich and elsewhere in the District according to a constant market share approach. This more detailed analysis confirms that there is no capacity for new convenience goods retail floorspace in Dover up to 2026, over and above existing planned commitments and strategic allocations. However the retail forecasts do identify capacity in the Deal/Sandwich area for circa 1,710 sqm net (2,450 sqm gross) of new convenience

goods ('superstore format') retail floorspace. This suggests that there is quantitative capacity for either a new foodstore or possible extensions to existing foodstores in this area over the development plan period.

For **comparison goods** the forecasts show no capacity for new retail floorspace across the District up to 2026. This is also explained by the significant new planned retail commitments and strategic allocations identified in Dover over the development plan period. Although there is no quantitative need for additional comparison goods floorspace in Dover, there is forecast capacity for circa 5,400 sqm net (7,720 sqm gross) of new comparison goods floorspace in the Deal/Sandwich area at 2026.

It should be noted that the base year (2012) capacity forecasts for convenience goods retailing are predicated on the future redistribution of residual expenditure from the District's existing out-of-centre stores (as a result of nominal 'over-trading') to new floorspace in Dover town centre. If there are no suitable and viable sites in Dover town centre or other centres that can meet the identified capacity, then any proposals for new retail floorspace in edge and/or out-of-centre locations will need to be assessed against the sequential and impact 'tests' in accordance with the advice set out in the NPPF.

It is also important to state that the capacity forecasts should be treated with caution, particularly post-2017. This is because they are based on various layers of assumptions and forecasts with regard to the trading performance of existing centres and stores, the forecast growth in retail spending, an allowance for the growth in Internet shopping, etc. Furthermore, the forecasts do not model the potential uplift in 'retention levels' that can occur within catchment areas following the delivery of significant new planned retail floorspace (such as the St. James Development), as well as strategic allocations.

With regard to policy boundaries, the study shows that there are high vacancy rates in Dover and the centre is significantly under-represented in terms of convenience goods provision. Dependent upon good design and connections, we anticipate that the implementation of the St. James development will provide an important anchor to the south of the town centre and generate wider enhancement to the centre through linked trips. We advise that the Council investigate the potential impact of the development upon implementation to determine whether it should be incorporated within the primary shopping frontage. We also recommend designating a secondary shopping frontage north of the current primary shopping frontage to take into account the retail and other main town centre uses here.

Within Deal, the mix of uses in the Experian defined centre is comparable to national averages. We advise that the Council consider incorporating a cluster of retail uses (including several convenience units) to the north of the defined centre within the town centre boundary to afford this area policy protection and to recognise its role as a natural extension to the High Street. Due to its immediate proximity to the defined town centre boundary and its important role in retaining local expenditure, and recommend that the Council consider incorporating the Sainsbury's on West Street within the defined town centre boundary.

In Sandwich, we advise that the Council defines a primary shopping area or town centre boundary around the extent of the current secondary shopping frontage to provide clarity with respect to which sites can be defined as "in", "edge" or "out" of centre. Where appropriate, the Council considers establishing similar boundaries in the District's other local centres and around concentrated local services areas within the built up urban areas of Dover and Deal (such as Temple Ewell, Whitfield and Walmer).

It is also recommended that the District Council set a local threshold above which retail proposals will require consideration of an impact assessment to demonstrate that the application would not have a significant adverse impact on existing, committed and planned public and private investment in centres and town centre vitality and viability.

EMPLOYMENT UPDATE EXECUTIVE SUMMARY

This report presents the findings of the Dover District Employment Update carried out by Scott Brownrigg and Ramidus Consulting for Dover District Council. It incorporates relevant findings from the *Dover District Retail Update Study (Aug 2012)* carried out in parallel by Strategic Perspectives and the *Sustainability Appraisal for Land Development – Dover Employment Sites (Aug 2012)* carried out by Scott Brownrigg.

The overall purpose of the Update was to review and reassess the evidence base underpinning the Council's employment policies and site allocations in the light of changing economic circumstances and the new national planning policy context.

Policy Context

The *Dover District Core Strategy (2010)* protects land allocated or last in use for employment uses and the *Dover Local Plan (2002)* includes 16 land allocations for B1/B2/B8. The Core Strategy also includes District Objectives for promoting the development of the District's economy including through active intervention of the District Council

The *National Planning Policy Framework (March 2012)* encourages the sort of aspirational and positive approach to development contained in the Core Strategy's Objectives. Given the underlying change in economic outlook for the District, the District Council should now consider how its interventionist and targeted economic development activities will be translated into future jobs growth and any associated employment land requirements.

Review of evidence base

The Core Strategy includes an employment growth outlook of +6,500 jobs for the period 2006-26 and states that some 200,000 sqm of additional employment floorspace would be needed to support this growth. However, the economic downturn since 2008/9, the government's public expenditure deficit reduction programme, and local job losses have meant that the Core Strategy's envisaged growth since 2006 has not occurred and the economic outlook is uncertain.

It is estimated that there will be some 4,000 to 5,000 job losses in Dover District by 2018 resulting from continuing recessionary factors and the contraction of the Pfizer operations at Sandwich. For the purposes of this Study, it has been assumed that Dover District employment will only return to its 2006 level by 2026, meaning no net growth over the period 2006-26.

This Study has reviewed the *Dover District Employment Land Review (2009)* which identified a requirement for 64.7 ha of employment land for the period 2006-26. This equates to the Core strategy requirement of 200,000 sqm floorspace. In light of the changed economic outlook and the identification of methodological issues in the *Employment Land Review*, we suggest that the overall additional employment land requirement for 2006-2026 is likely to be less than 5 ha. As a worst-case scenario this requirement could reduce to zero.

In addition, the Pfizer site (Discovery Park Enterprise Zone) adds to the employment land supply by some 280,000 sqm of additional employment floorspace, with potential for a further 100,000 sqm.

Site assessments

For the purposes of this Update, 17 sites and the Deal Study Area were identified for assessment in terms of their potential to provide sustainable development for employment use. The sites include existing saved Local Plan allocation sites and several others. The combined area of the 17 sites totals some 227 ha. Including potential floorspace from existing planning consents, the sites have potential for an additional 386,000 sqm of employment floorspace.

The 17 sites and the Deal Area were assessed using Scott Brownrigg's Sustainability Appraisal for Land Development (SALD) methodology. Taking into account the SALD scores and the Core Strategy's approach to the distribution of employment land, nine sites are identified as initial priority sites for employment uses. Including existing planning consents, the sites have potential for an additional 283,000 sqm of floorspace. The nine priority sites provide a floorspace distribution similar to that in Table 3.1 of the Core strategy and thus provide a starting point for prioritising sites which reflect both the Core Strategy spatial objectives and the potential for achieving sustainable development.

The four highest scoring priority sites for employment use are:

- St James' Area;
- Discovery Park;
- White Cliffs Business Park;
- Sandwich Industrial Estate

The five other priority sites are:

- Eastry Hospital
- Ramsgate Road, Sandwich
- Aylesham Development Area
- Betteshanger Colliery Pithead
- Albert Road, Deal

There are four lower priority employment sites in Dover;

- Old Park Barracks
- Ex Channel Tunnel Workers Camp, Farthingloe
- Coombe Valley Road East
- Coombe Valley Road West

The four sites with lowest priority for employment use are:

- RM School of Music, Deal
- Pike Road, Eythorne
- PAD site (to the south of Minter's Yard)
- Marlborough Road, Deal

Sub-regional context

This Update was carried out in consultation with Kent County Council and the neighbouring authorities in East Kent of Ashford, Canterbury, Thanet and Shepway. Three joint meetings were held during the course of the Update to discuss the emerging findings.

The key sub-regional issues are:

- a general consensus on the changed economic outlook resulting in lower requirements for employment land across the sub-region (although Ashford reports continued demand for employment floorspace at Eureka Park);
- the sub-regional impact of the Pfizer contraction and the implications of Discovery Park having Enterprise Zone status;
- the implications for neighbouring centres when Dover Town increases its retail market share through the St. James' scheme; and,
- general agreement that collaboration on a new East Kent sub-regional economic outlook may be beneficial for informing emerging Local Plans and future reviews of existing plans.

White Cliffs Business Park

The 55 ha White Cliffs Business Park has potential for some 53,000 sqm of floorspace in addition to existing unimplemented planning consents of 71,800 sqm. While maintaining its function as a premier business location and sustainable location, there is potential for other employment generating uses on the Business Park which could also contribute to sustainable development. When main town centre uses are proposed at the Business Park they should be the subject of sequential testing in accordance with the NPPF.

Discovery Park

The progress of Discovery Park will have implications for employment land supply, not only for the Sandwich area, but for the District and neighbouring authorities. The site achieved one of the highest SALD scores for employment space and as such should be a priority location for employment uses.



**Appendix 3
Duty to Cooperate**

**Planning Advisory Group
13th September 2012**

**Cabinet
1st October 2012**



Regeneration Delivery
 White Cliffs Business Park
 Dover
 Kent CT16 3PJ

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Letter sent to:
 Kent County Council
 Ashford Borough Council
 Canterbury City Council
 Shepway District Council
 Thanet District Council

Contact: Adrian Fox
 Direct line: (01304) 872474
 E-mail: Adrian.Fox@dover.gov.uk
 Our ref: FP/LDF1/GEN
 Your ref:
 Date: 28 August 2012

Dear

Duty to Cooperate - Land Allocations Local Plan

Thank you for attending a meeting at Dover District Council Offices on Thursday 23rd August 2012.

Duty to cooperate

The purpose of the first part of the meeting discussed paragraphs 178-181 in the National Planning Policy Framework (NPPF). These paragraphs outline the requirements for public bodies to demonstrate that they have effectively cooperated across local authority boundaries and considered cross-boundary impacts when their Local Plans are submitted for examination.

Dover District Council's Adopted Core Strategy is the overarching policy document for the District. The primary purpose of the Land Allocations Local Plan (the Plan), which the Council is in the process of finalising, is to identify and allocate specific sites for development in order to meet the Core Strategy's requirement for housing and employment. The Plan covers the same period as the Core Strategy.

It was agreed at the meeting that under the requirements of duty to cooperate it is important to identify and consider the implications of any cross boundary issues that are of a strategic nature, rather than localised site specific issues, that have happened since the Adoption of the Core Strategy. The following issues were identified at the meeting as potentially having cross boundary issues:

Duty to Cooperate - Land Allocations Local Plan	
Issue	How DDC is addressing this
Coastal Change Management Areas (CCMAs)	The Plan will identify CCMAs which are areas likely to be affected by physical changes to the coast. The CCMAs are based on work that has already undertaken by the South East Coastal Group on the Shoreline Management Plans.

Green Infrastructure (GI)	The Plan has developed the GI work that was included in the Core Strategy and will include a policy on Open Space and standards. The work on GI is being progressed on a collaborative basis at an East Kent level working with adjacent local authorities, statutory and non-statutory agencies.
Heritage Strategy	The Plan will include text and guidance on Heritage Assets. This is based on the Dover District Council's Heritage Strategy which has recently been consulted on and involved a series of workshops.
Retail and Employment Update	In recognition that retail and employment issues are a cross boundary issue the Council invited Officers from Ashford, Canterbury, Thanet and Shepway Council's to be involved with the preparation of the Retail and Employment Update. There has now been three working group meetings held at Dover District Council Offices. Copies of the draft Retail and Employment Reports have already been circulated and we would welcome any specific comments on the Reports and whether you are broadly in agreement with the way that the study was undertaken.

As discussed at the meeting, there did appear to us to be a consensus in terms of the duty to cooperate, there were not any issues of a strategic cross boundary nature that were not already being addressed on a collaborative basis. It was agreed that any localised issues arising from the Plan could be dealt with through the statutory consultation process/Examination in Public. Please can you ensure that you confirm in writing, at an Officer level either by letter or E-mail by **5th September 2012**, that this is your understanding of the situation.

Thank you in advance

Yours sincerely

Adrian Fox
Principal Planner

From: Dave.Shore@shepway.gov.uk [mailto:Dave.Shore@shepway.gov.uk]
Sent: 31 August 2012 16:35
To: Adrian Fox
Cc: Mark.Aplin@shepway.gov.uk
Subject: RE: Duty to cooperate

Adrian

I refer to the meeting on 23rd August 2012 and your letter dated 28th August 2012 regarding the duty to co-operate in respect of the Dover Land Allocations Local Plan. I can confirm that Shepway District Council concurs with your view that there were not any issues of a strategic cross boundary nature that were not already being addressed on a collaborative basis and that any localised issues arising from the Plan could be dealt with through the statutory consultation process/Examination in Public.

Regards

Dave

David Shore
Planning Policy and Economic Development Manager

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Adrian Fox
Regeneration Delivery
Dover District Council
White Cliffs Business Park
Dover
Kent CT16 3PJ

4 September 2012

Duty to Co-operate Land Allocations Local Plan

Dear Adrian

Further to your letter of the 28th August 2012, I can confirm that we agree with the details set out in your letter.

Our view is that strategic issues which may have cross-boundary effects are dealt with in the Core Strategy, and as the Land Allocations Document proposes to meet the Core Strategy requirements it should not raise any cross-boundary issues itself.

My understanding is that you are dealing with the proposals for the Enterprise Zone at Sandwich, which would have potentially significant cross-boundary effects, outside of the Land Allocations Document.

With regard to the retail and employment work, I can confirm we have been involved in meetings regarding the production of these documents. The retail work in particular has involved the use of shared evidence, with the results of recent telephone surveys for Dover and Thanet being exchanged and used in the work. The recommendations in the draft Retail Study Update, being based upon a constant market share, raise no cross-boundary issues for Thanet.

Please do not hesitate in contacting me if we can be of further assistance.

This response is provided at Officer level.

Yours Sincerely

A handwritten signature in black ink, appearing to read "Ashley Hills".

Ashley Hills
Planning Projects Manager
Community Services



INVESTOR IN PEOPLE

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Kent
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01843 577000
www.thanet.gov.uk

From: Simon Cole [mailto:simon.cole@ashford.gov.uk]

Sent: 05 September 2012 09:54

To: Adrian Fox

Cc: Kate North

Subject: RE: Duty to cooperate

Dear Adrian,

Thank you for your letter. On behalf of Ashford Borough Council, I can confirm that I agree and am happy to support the consensus position that you outlined.

Regards,

Simon

Simon Cole
Policy Manager
Ashford Borough Council

Tel: 01233 330642

From: Adrian Verrall [mailto:Adrian.Verrall@canterbury.gov.uk]
Sent: 05 September 2012 12:47
To: Adrian Fox
Cc: Sarah Parker
Subject: Duty to Cooperate - Land Allocations Local Plan

Hello, Adrian

I think we can agree that there is a consensus in terms of the duty to cooperate, and there were not any issues of a strategic cross-boundary nature that were not already being addressed on a collaborative basis, particularly in relation to the issues we have been discussing recently.

The only issue where we think a continuing "watching brief" is required is transport. We will be receiving the results of our transport modelling in the next couple of days and clearly there are routes (A2 and A257 in particular), where new development may have cross-boundary effects. I think we raised this issue previously at Core Strategy stage in relation to Whitfield, and Sarah mentioned the transport issue at the recent meeting. This is not to suggest at this point that these issues are necessarily highly significant, but it would be useful to keep this under review as the Plans develop.

Hope this helps.

Regards.

Adrian



Adrian Fox
Principal Planner
Planning Services
Dover District Council
White Cliffs Business Park
Dover
Kent, CT16 3PJ

Kent County Council
Planning & Environment
Invicta House
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Maidstone
Kent ME14 1XX
Tel: 01622 221607

Email: Adam.reynolds@kent.gov.uk
Ask for: Adam Reynolds
Your Ref: FP/LDF1/GEN
Date: 4 September 2012

Dear Mr Fox

Duty to Cooperate – Land Allocations Local Plan

Thank you for your letter outlining what was discussed at the Duty to Cooperate meeting on 29th August which I attended.

I can confirm that it is my belief that there are no issues of a strategic cross boundary nature that are not already being addressed on a collaborative basis. To recap, there are examples of particular cooperation between KCC and your District:

Duty to Cooperate – Land Allocations Local Plan	
Issue	Cooperation between KCC and DDC
Green Infrastructure (GI)	Any work which has already been undertaken with the Biodiversity Partnership will demonstrate cooperation.
Heritage Strategy	KCC has been cooperating with DDC and English Heritage to produce a Heritage Strategy for Dover including a 'resource assessment' of the significance of Heritage Assets within Dover and those most at risk. KCC has been working with DDC for over a year, on issues including heritage as a catalyst for regeneration, and its implications for site allocations.
Retail and Employment Update	KCC Business Intelligence (BI) has been working with DDC through the PopGroup model, to assist in setting DDC future housing numbers. KCC BI no longer maintains a retail monitoring service, but annual employment land surveys have been maintained carried out jointly between DDC and KCC BI.

In addition KCC are cooperating with DDC on an ongoing basis on land use transportation modelling.

Yours sincerely,

Adam Reynolds
Planning Officer



Appendix 4 Site Forms

**Planning Advisory Group
13th September 2012**

**Cabinet
1st October 2012**

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Explanation for sites where the Group's recommendation does not concur with Officer recommendation

LDF02 (WOO01) - Land south of Sandwich Road

Officers recommended that this site should be allocated for frontage development as this would not impact on the wider landscape or any heritage assets. The Group recommended that the site should not be allocated because development would intensify linear development in this location and it would bring no benefits to the village as a whole.

SHL048 - Land between Stoneleigh and Nine Acres, The Street, Woodnesborough

Officers recommended that this site should not be allocated due to detrimental impact on the landscape and historic assets. The Group recommended that it should be allocated due to improved connectivity, local support and did not consider that there would be any detrimental impacts on landscape or heritage assets.

LDF015 – Land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel-le-Ferne

Policy CP1 of the adopted Core Strategy categorises Capel as a Local Centre. This reflects its role in serving other nearby settlements (i.e. Alkham and West Hougham). Capel's position in the settlement hierarchy was elevated from a Village to a Local Centre in light of the representation made by the Parish Council at the Preferred Option public consultation stage of the Core Strategy.

The Parish Council would welcome additional housing accompanied with improved infrastructure. Their representation reflected this desire, suggesting a further site for consideration (to bring the total for the settlement to 110 units) with the recognition that additional sites may come forward.

Officers have suggested that in terms of appraising this site (LDF015) little has altered since the Local Plan Inquiry and that development could have an adverse impact on GI, the setting of the AONB and Heritage Coast. Having reviewed all the sites submitted for consideration in Capel, and taking into account of the representations received from the Parish Council, the site is considered to be suitable for development to reflect Capel's role as a Local Centre.

LDF01 – Land behind Homeside, Eythorne; LDF011 Land to the east of Monkton Court Lane

The LDF PAG considered both sites. Eythorne is categorised as a Village in the Settlement Hierarchy. Members of the group felt that, based on the size of the village and the limited number of services and facilities available, only one site should be selected as suitable for development.

LDF011 lies on the edge of the existing built development; there is no natural boundary to the east. The site currently provides a soft edge to the village. Development of the site could have an adverse impact on the setting of the village, unless considerable care was taken with landscaping.

In contrast, LDF01 is hidden from Sandwich Road, although it is visible from the recently (1990s) constructed properties in Sun Valley Way. The site contributes to the landscape setting of the village in medium distance views from the north west. Officers have raised concerns with developing this site as there are complex landownership issues in relation to accessing the site and little has altered (in relation to medium distance views) since the Local Plan Inquiry.

The LDF PAG have concluded that the impact on the setting of the village, and on the wider landscape, would be significantly greater with the development of LDF011. Subject to further investigation of the access arrangements, LDF01 is recommended for allocation.

Dover

Commentary on sites submitted to the Council

To explain the reasons for why no site form has been produced

Site Code	Location	Total No / Outstanding	Planning Application Reference	Notes
PHS008	Whitfield Western Expansion Area			Strategic Allocation in the Core Strategy.
PHS002	Whitfield Eastern Expansion Area			Strategic Allocation in the Core Strategy.
PHS003	Pond Close Nursery, Dover			Withdrawn
LDF038	Land on the corner of Melbourne Avenue/Old Park Barracks			Developed
LDF020	Old Park Barracks, Melbourne Avenue			Developed
UCS018	Allotments and Lock-ups, Melbourne Avenue, Dover			DDC owned site, but not put forward
LDF019	Land adj to & rear of 21 Cherry Tree Avenue, Dover		Capita Symonds (May 2010) Flood Risk Appraisal of the River Dour shows site within flood zone 3b, the functional flood plain and would not be suitable for development	
LDF035	Connaught Barracks			Strategic Allocation in the Core Strategy.
PP007	Rear of Gasholder site, Coombe Valley Road	14	Expired consent (2003 permission). Application submitted 11/00287 refused. Pre-app underway Aug 2012.	
UCS001	Royal Mail Depot, Granville Street			Site in use and not put forward by the Royal Mail
PP011	Youth Hostel, 306 London Road	9	Planning Permission 10/00837	
LDF025	Land on the corner of York Street			Part of Dover Waterfront: Strategic Allocation in the Core Strategy.
PP006	Spare ground to rear of Clarendon Road at Railway line <i>also known as land r/o 69-75 and 77 Folkestone Road</i>		Planning Permission (outline) 05/00862 – expired April 2011	1 unit at 77 Folkestone Road has reserved matters consent and counted in HIA (pp for entire site extant?)
LDF037	Land adj to Westmount College, Folkestone Road	98	Part of Planning Application 08/619	Full permission expires Sept 2012.
SHL062	Melbourne Community Primary School, Melbourne Avenue, Dover			In use for KCC (Social Services Education Offices).

				Email received 07 July 2010 stating that KCC have no future plans to have this site allocated.
PHS005	Whitfield Valley, Dover/ Campsite north of Kearsney Avenue, Temple Ewell			We understand that KCC do not wish to progress with consideration of this site (2006)
LDF022	65/67 Folkestone Road	8	Planning Permission (outline) 05/00217 expired	
LDF036	Land at Barwick Road	Up to 220	07/1095	Planning Committee has agreed to vary the S106 to remove the requirement for affordable housing. Renewal of Outline application approved.
LDF07	Eclipse Recovery Services and Sorting office, Maison Dieu Road	40	10/00399 (full, with conditions discharged)	SHG, under construction.
UCS019	European Vehicle Recovery Centre, St John's Road			Await submission of planning application.
SHL033	Land rear of 94 Crabble Hill, Dover	Site developed		
LDF030	Buckland Paper Mill		06/1455	Full planning permission granted for mixed use scheme and construction has started on site of 141 dwellings. Outline application covers remainder of site (193 dwellings).
LDF028	Land adjacent to Royal Oak P.H. Whitfield	6	10/00398 and granted 08/06/2011	Developed.
SHL057	Land at Kearsney, Dover			Withdrawn at Interim Consultation
DOV02	Land to west of Bunker's Hill			Withdrawn by owner
DOV06E	Land off Honeywood Parkway	Planning permission granted for retail – bulky goods	07/00802	
DOV07	137-142 London Road including land to rear			Part of site in use. Within confines so could therefore come forward in line with

				Policy DM1 of adopted Core Strategy
DOV07C	Land to east of Sandwich Road, Whitfield			Submitted for change of confines, superseded by Policy CP11 of the adopted Core Strategy
DOV12	Land to the west of St. Alphege Road including the former rectory and church hall			Since submitting the site the rectory has been converted into flats. Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
DOV13	Part of churchyard associated with St. Peter's and St. Paul's Church			Former burial ground. Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
DOV18	Land at the junction of Archers Court Road and Roman Road, north of Pineham			Pineham is a hamlet, and therefore will not be considered unless alternative sites can be found.
SAD19B	Former Powell Print, 57 Coombe Valley Road	24	07/1354 pending legal agreement. Subsequent pre-app 2009	
SAD19E	Former motorline garage, to south of gas holder	17	09/1187 (RM)	
DOV21	Allotments to the north of Folkestone Road	40		Owned by Dover Town Council and not available (formally withdrawn)
SHL070	Land at Old Park Hill, Dover	49	Planning Application submitted DOV/12/00045	
SHL006	Charlton Green Shopping Centre, High Street		Recently changed hands at auction as Targetfollow went into administration. Likely to come forward as retail, and therefore is not being considered as part of this process	
LDF026	Esso P.F.S			Reopened and operating as Esso P.F.S
DOV44	Land to the west of Victoria Street and south of Coombe Valley Road	3		Within confines so could therefore come forward in line with Policy DM1 of adopted Core

				Strategy
SAD10	Play area adjacent to Girl Guide and Brownie Hall, Whitfield	2		Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
SAD11	Land opposite the Former Royal Oak PH, Sandwich Road, Whitfield	5		Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
SAD14	Land alongside the access road to Kearsney Railway Station	4		Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
SAD21	Norman Street Car Park	4		Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy
SAD17	Land to the west of Dublin Man-o-war PH	2 - 3		Within confines so could therefore come forward in line with Policy DM1 of adopted Core Strategy

Site Code SHL066	Address Eastling Down Farm, Sandwich Road, Whitfield	Parish Whitfield	Overall SHLAA Score 29.5 (Undeliverable)	Area 2.08 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site There is a large residential property within the site. To the immediate south lies the Whitfield Urban Expansion Area. This area is covered by an adopted Supplementary Planning Document which includes a masterplan for the area. The land immediately to the south of the site has been identified as a potential area for a cemetery/churchyard. To the north, east and west lies open countryside.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the urban boundary and the Whitfield Urban Expansion Area (Core Strategy Policy CP11).				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact Development here, just outside of the context of the Whitfield Urban Expansion masterplan could undermine the landscape mitigation provided for that expansion. The site is relatively prominent and development would exacerbate the intrusion into the countryside, with or without the urban expansion going ahead. Biodiversity Although Waddling Wood – ancient woodland- lies less than 270m to the west, there are no rights of way to, or within this woodland. The site is relatively isolated in terms of wildlife corridors, but the sheer number of buildings on the farm site and proximity of ancient woodland indicates that bat surveys would be required. Common reptiles may be present.				
EIA Screening: required due to size			Appropriate Assessment: contribution to the Thanet Coast SPA mitigation strategy required. Also screening of other impacts in the context of Whitfield must be considered.	
Green Infrastructure Development of this site is likely to be detrimental to the proposed GI for Whitfield Urban Expansion, by introducing an urban element on a rural edge.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

As part of the Whitfield urban Extension junction improvements are proposed at the A256/Sandwich Road junction. There are no firm proposals regarding the junction improvements with the A256 at this stage but it is likely to include third party land when this phasing of Whitfield is looked at. The site would be better looked at in conjunction with the Whitfield development and linked to it rather than producing a further vehicular access which would need a further emergency access if the indicative number of 62 units and could compromise the Whitfield layout.

Access to Services SHLAA Score: 1.0 – Site with no public transport, GP surgery and school within 10 minutes walk

The site is located to the north of the Whitfield Urban Expansion Area. At present Phase 1a, will include a number of facilities, and will be located to the south east of the existing urban area. This local centre would be within a ten minute walk of the site. At present the existing facilities in Whitfield, including a primary school and GP surgery, would be further than a ten minute walk. A bus stop would be within

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site lies outside of the Whitfield Urban Expansion area, for which a masterplan has recently been prepared and adopted. Prior to the scheme being completed it would be premature to consider this site for residential development.

Consider for inclusion in the Submission Document?

No

Site Code SHL077	Address Land to the south of A2, Whitfield, adjoining Herald Wood	Parish	Overall SHLAA Score 29.5 (+15 Years)	Area 20.33ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 612.3
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site The site is a flat spur of land in an elevated position above the valley of the Dour. It sits above the A2 and is screened from this by trees. It is enclosed to the south west by trees (Lousyberry Wood) but it is very exposed to the south and east where there are open fields. Beyond these, to the south, is Temple Ewell. To the north is the A2 and the site adjoins Herald Wood in the north eastern corner.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is located outside of the urban boundary. The northern slither of the site is covered by the ‘saved’ Local Plan policy which safeguards land for the dualling of the A2.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>The land slopes in a south easterly direction.</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment No considerations</p>				
<p>Landscape Impact Development of this site could have an adverse impact on the setting of the AONB as the site is reliant on tree screening (including remnants of the 1987 storm) from the AONB. There may also be an intensification of night glare, albeit against the setting of Whitfield and the A2. There would be an adverse impact on the setting of Herald Wood (a memorial to the 1987 ferry tragedy) with a heightened risk of urbanisation pressures/damage. There would be a loss of tree cover along the northern boundary if an access on to the A2 were created and this could lead to an urbanisation of this section of the A2.</p>				
<p>Biodiversity The site abuts the Temple Ewell and Lydden Downland LWS and lies within 600m of the Lydden and Temple Ewell Downs SAC and SSSI. Although there are no direct links to the SAC, indirect links exist which could result in an increase in recreational pressure on the site. The site, itself, is arable with a rough grassland fringe and could be important for farmland birds and common reptiles. There is a high population of badgers in the general environment and the site would need assessment for these.</p>				

<p>EIA Screening: required, although preliminary indications are that full EIA would be necessary. (S2.10 – urban infrastructure)</p>	<p>Appropriate Assessment: site-specific and in-combination with WUE would be required to consider urbanisation and recreational impacts on the Lydden and Temple Ewell Downs SAC, together with vehicular N deposition on the same and Dover to Kingsdown Cliffs SAC</p>
<p>Green Infrastructure</p> <p>The site is an integral part of the proposed Green Infrastructure Network and provides a link between Whitfield Urban Expansion GI and the Lydden/Dour escarpment, one of the main GI arteries in the district, identified as requiring increased conservation management. It currently provides a limited, but well-used recreational resource (PRoW ER182) which in itself is proposed as mitigation of recreational pressure that may result from development south of Singledge Lane. Development of SHL077 would result in a change of character of the setting of this footpath, effectively eliminating its use as partial mitigation for the above development on the Lydden and temple Ewell Downs SAC. Additionally, there would be directly increased recreational and urbanisation pressure on Lousyberry Wood (Temple Ewell and Lydden Downland Local Wildlife Site) to the south. The risks to biodiversity interests and recreational GI are such that development cannot be recommended.</p>	
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>Access would be problematical due to the difference in levels and would be onto the A2 trunk road which would need Highway Agency approval. The site is too close to Whitfield roundabout. No acceptable vehicular access could be found. Access onto the highway network to the south would need to cross third party land.</p>	
<p>Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school</p> <p>The site is close to the edge of Temple Ewell, but given that the site is remote from the settlement access would need to be via Public Rights of Way. The railway station at Kearsney provides connections to Dover, the north Kent coast, Canterbury and beyond to London. Both Temple Ewell and Whitfield have Primary Schools, however in order to walk to Whitfield Primary School this would require crossing the A2. This would not be satisfactory, presenting issues in relation to pedestrian safety. A GP surgery is located in Whitfield, but again this would require crossing the A2.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site does not have a safe access point onto the highway network for the amount of traffic that a development of this size would create. Access would not be possible onto the A2 due to the close proximity of Whitfield roundabout and access to the highway network to the south would be onto residential road not suitable for this amount of traffic. Any development would have an adverse impact on the setting of the AONB. The site is an integral part of the proposed Green Infrastructure Network, and is a well used resource. Furthermore, biodiversity interest (farmland birds and common reptiles) means that development should not be recommended.</p>	
<p>Consider for inclusion in the Submission Document? No</p>	

Site Code PHS001	Address Land to the west of The Avenue, Temple Ewell	Parish Dover Town	Overall SHLAA Score =	Area 1.5 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site This is an extensive wooded area, which is located on steep and possibly unstable land. It is roughly rectangular with existing residential properties to the west and The Avenue backing on the site. On the three other sides the site is surrounded by open countryside. The site lies to the north of the parish of Temple Ewell, which is part of Dover town. It is accessed through the existing residential area which is adjacent to the site, however The Avenue is a narrow unadopted road.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within Open Space or Statutory Nature Reserve or Green Wedge, Green Corridor or Historic Park. Outside development envelope and non-housing designation				
The site is divided by groundwater protection zones 2 and 3. The site lies outside, but immediately adjacent to the urban boundary.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Topography is very steep (hillside position). The wooded hillside is subject to a TPO, although it was severely damaged in the 1987 storm.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is a wooded hillside, which although severely damaged in the 1987 storm, still makes an important contribution to the wider landscape and provides an attractive setting for the edge of Temple Ewell. Development could only damage the setting of Temple Ewell and the wider approach to the outskirts of Dover.				
Biodiversity The site is part of Temple Ewell and Lydden Downland LWS. The woodland was primarily Beech, although Ash and Sycamore are filling the storm-damaged gaps. Full biodiversity surveys would be necessary, including use of the woodland edge by bats.				
EIA Screening: S2.10, urban infrastructure.			Appropriate Assessment: Essential, due to proximity of Lydden and temple Ewell Downs SAC; also contribution to Thanet Coats SPA required.	
Green Infrastructure				

The site is a LWS and has a PROW (ER182) running along the SE boundary. There are informal paths through the woodland. The site contributes in terms of biodiversity and recreation. The site is part of the protected GI of the district (Policy CP7).

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility

The only access to the site is through the existing residential area of Temple Ewell. These roads are narrow and without footways. Both the Avenue and Park Road are poorly maintained, rural in character and unadopted. Given the steep gradients on the site access would be unachievable. The junctions with London Road which would be used to serve the site are unsuitable for the proposed number of dwellings.

Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school

The site is located in close proximity to Temple Ewell which offers a number of facilities and services. Kearsney Railway Station would be within a ten minute walk of the site. However the nearest primary schools are River Primary School and Temple Ewell Primary School, both of which are further than a ten minute walk.

At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although the site is within walking distance of local services the gradient is steep, which would encourage people to use their cars for short distance trips. The proximity of the Lydden and Temple Ewell SAC will necessitate formal appropriate assessment. The site is protected for its biodiversity and its contribution to GI. The site is unsuitable for development since it is not possible to achieve a satisfactory access, trees on the site are protected and the site makes an important contribution to GI.

Consider for inclusion in the Submission Document?

No

Site Code SHL045	Address Manor Farmyard, Egerton Road, Temple Ewell	Parish	Overall SHLAA Score 41 (0-5 Years)	Area 0.74 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 22.2
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
Description of Site Located at the end of a private road, this site is overgrown. A number of redundant farm buildings, including two silos for feed, are located on the site. To the north and east are open fields, and to the south and west existing residential development. At present, the site provides a very soft edge to the urban area, and any development would have a significant impact on the landscape setting.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
A very small part of the site, alongside Malvern Cottages, is located within the urban boundary. The remainder is located out of the urban boundary, but immediately adjacent to it.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
There is a significant drop from the road into the site.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment Given the relationship of the site with the surrounding properties any development should be at a lower density than the 30dph specified. An appropriate number of dwellings would be approximately 6 to 8 units set in substantial grounds.				
Landscape Impact The location of Manor Farm is quite discrete, partly due to hedgerows screening the site from the wider Whitfield Valley. As such there may be potential for low density development, in keeping with the general rural/urban fringe setting, although there may be pressure on reducing structural vegetation to enjoy valley views. The impact on landscape character would be adverse at 30dph due to its bringing the urban form too far into the countryside.				
Biodiversity There would be potential impact on protected species. bats, common reptiles. A full biodiversity scoping survey would be necessary due to the abandoned nature of site				
EIA Screening At 30dph, screening would be necessary under S2.10		Appropriate Assessment: at 30 dph, screening for in-combination N impacts on nearby SACs would be necessary as well as contributing to Thanet Coast SPA mitigation.		
Green Infrastructure There are no PRoWs nearby and recreational GI is met by the present of the scout camp and playing fields adjacent to the site. The site adjoins the Local Wildlife Site Lousyberry Wood and there are clearly informal paths that skirt this and the plateau field (SHL077) to the north, joining PRoW ER 182. If permissive paths could be established to reinforce these connections, there could be benefit both for this site as well as the wider locality. This approach would fit with prospective development of the GI network.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct				

access to site

The only access option would be in the form of an extension of the existing private road. Egerton Road is a single carriageway width private road without formal pavements or other form of pedestrian safeguarding.

The junction with London Road is hazardous due to substandard sight lines. The sight lines are impaired by the wall located immediately to the right when leaving Egerton Road in a forward gear. Increased use of this junction is likely to increase the risk of crashes to the detriment of road safety.

KCC Highways do not consider Egerton Road suitable to accommodate an increase in traffic movements, generated by further development, in view of the lack of pedestrian safeguarding, lack of passing bays on the private road and the substandard junction arrangement with London Road. In view of this an application seeking an increase in residential properties utilising Egerton Road for access would be strongly resisted.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The nearest bus route is located on London Road providing connections into Dover. Both River and Temple Ewell are located a short distance from the site, where a variety of services and facilities are on offer, including a Primary School. Kearnsey Railway Station is located within a five minute walk of the site.

At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site currently provides a soft edge to the existing urban area. The surrounding properties are of loose urban grain, and comprise of properties set in large grounds. Advice from KCC Highways considers that Egerton Road is unsuitable for accommodating an increase in traffic movements.

In conclusion, access to the site is not considered suitable to support residential development and the development of the site should be resisted.

Consider for inclusion in the Submission Document?

No

Low density given rural fringe location and access arrangements.

Site Code SHL050	Address Manor View Nursery, Lower Road, Temple Ewell	Parish Hierarchy Secondary Regional Centre	Overall SHLAA Score 30 (11-15 years)	Area 1.13 ha Indicative No. of units @ 30 dph = 34
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Located immediately adjacent to the railway line (and a raised viaduct), this site is currently occupied by a plant nursery and comprises a main nursery building, together with a number of glasshouses. Part of the site is open countryside, and adjoins the AONB to the west. Residential properties lie to the east, and beyond the railway line to the north.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
<p>The main part of the site lies outside but adjacent to the urban boundary. A small portion of the site is the garden associated with the property, 32 Lower Road, although the property is excluded from the site. Part of the site adjoins the AONB.</p>				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
<p>The site adjoins railway line and viaduct, which lies a few metres higher, therefore noise and vibration issues would need to be examined. The land rises to the west, and there are also areas of woodland alongside the site's boundary with the AONB.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>Development should be concentrated to the east of the site, although it is recognised that any development would be against the existing urban grain.</p>				
<p>Landscape Impact</p> <p>The site is adjacent to AONB, the boundary of which lies some 55m to the west. While businesses such as nurseries are commonly found on the periphery of villages, the current usage is not exceptional. The site is not fully developable as development in close proximity to the boundary with the AONB would affect the setting of the AONB. A non-residential landscape buffer would be required and the density would need to be reduced to maintain a soft urban edge. Building heights would also need to be restricted to no more than 2 storeys.</p>				
<p>From elsewhere, the site appears to be relatively self-contained, and is bounded by the railway viaduct to the east.</p>				
<p>Biodiversity</p> <p>The presence of the railway embankment with scrub would indicate that the site may be used by bats and a scoping survey would be needed. However, unless bats roost in the outbuildings, they would not be an impediment to development.</p>				
<p>EIA Screening would be required due to landscape sensitivity <input type="checkbox"/> Appropriate Assessment: the threshold may be triggered for Thanet Coast SPA <input type="checkbox"/></p>				

		mitigation.	
Green Infrastructure			
<p>Currently, apart from greenhouses etc. the site is a horticultural field. There is no public access. The contribution of the present site to GI is minimal. In order to satisfy landscape requirements, a certain amount of GI would come forward, but its impact would be localised to any new development on the site, rather than for general use.</p>			
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site			
<p>The sight lines run over third party land. If number 32 Lower Road is included, then a suitable access can be achieved. If not, then an acceptable access can not be created.</p> <p>Land will be needed for two, possibly three adjacent properties to secure visibility at access. An access road would need to be laid out to adoptable standard which may also require land from the property adjacent to access.</p> <p>We have obtained written confirmation that the house is included within the same ownership.</p> <p>A footway runs alongside the west of the road under the viaduct and connecting to the east a Public Right of Way provides access to Kearsney Railway Station and London Road where there are bus connections to Dover Town and White Cliffs Business Park.</p>			
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk			
<p>The site is located in close proximity to Temple Ewell which offers a number of facilities and services. A bus stop is located along Lower Road, and a primary school just to the north of the viaduct.</p>			
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost			
Ownership SHLAA Score: 4.5 – Single Private Ownership			
Analysis			
<p>There is no overriding reason to prevent development from coming forward on this site. However, the site would only be suitable for partial residential development to enable a landscape buffer to be provided between the new development and the boundary of the AONB.</p>			
Consider for inclusion in the Submission Document?			Yes

Site Code SAD13	Address Land to south of Alkham Road	Parish Dover Town	Overall SHLAA Score = The site is too small to be considered in the SHLAA	Area 0.15 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score:				
<p>Description of Site</p> <p>The site is located to the north western edge of Dover. It lies to the south of Bushy Ruff/ Russell Gardens on the opposite side of Alkham Road. These gardens are designated as an historic park and gardens. This small site is square in shape, to the east lies the garden associated with Waterfall Cottage and to the south and west is undeveloped countryside. The land immediately to the west is located within the AONB. The site has been put forward for one unit, however in order to ensure the most efficient and effective use of land (in line with PPS3) the site is being considered for a scheme at a minimum density of 30dph (in line with Policy CP4 of the adopted Core Strategy).</p>				
Policy Alignment SHLAA Score:				
<p>The site lies some distance from the urban boundary, and it would not be possible to logically extend the urban boundary to include this site without including other properties and land located on Alkham Road. Bushy Ruff/ Russell Gardens are located opposite the site, these are protected by Policy DM19.</p>				
Physical Constraints SHLAA Score:				
<p>Any development of the site would have a detrimental impact on the setting of the AONB.</p> <p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment Russell Gardens, which is located opposite the site, is protected by Policy DM19. This includes the protection of views to and from the park/garden. Any development of the site would have a detrimental impact on the setting of the listed park structures and designated Historic Park.</p> <p>Landscape Impact The site is one of a patchwork of relatively small rural land holdings extending beyond Abbey Road along the Alkham Valley to Chilton Farm and beyond, comprising woods and fields, some managed for agriculture, others not. Only a few of these have housing with the highest density being opposite Bushy Ruff and Russell Gardens (3 houses). Development at 30dph would have a severe and detrimental setting to the edge of Kearsney and the approach to Dover as well as on the setting of the adjacent AONB.</p> <p>Biodiversity The site is managed as a copse, primarily of coppiced hazel. The field layer contains some non-native planting, but will support native wildlife, given its location.</p>				
EIA Screening: too small to be considered		Appropriate Assessment: too small to be considered		
<p>Green Infrastructure</p> <p>The site contributes to the general 'green' entrance to Kearsney and will give some biodiversity benefit to the surrounds. There are no PROW close to the site or real opportunities for development to enhance links. Any development would need to consider and avoid surface water run-off.</p>				

Proximity to Road Network SHLAA Score:	
<p>The site fronts Alkham Road at the point where the speed limit has just moved from 30mph, within the built up area, to a 50mph speed limit. There are sufficient sightlines to achieve an access off Alkham Road. The site submission gave an alternative option of accessing the site, namely through the existing dwelling which fronts Abbey Road. This would involve taking a road through the entire length of the garden associated with Waterfall Cottage.</p>	
Access to Services SHLAA Score:	
<p>The site lies within a 10 minute walk of Kearsney Railway Station, providing a rail service to Dover Priory, and to London via Canterbury. There is a bus stop to the east of the site which provides a connection to Dover Town Centre. The nearest Primary Schools, shops and services are located in River and Temple Ewell, however this would be more than a ten minute walk.</p> <p>At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.</p>	
Market Attractiveness SHLAA Score:	
Ownership SHLAA Score:	
Analysis	
<p>The site would not be suitable for development given that it lies some distance from the urban boundary. Any development of the site would have a detrimental impact on both the nearby Historic Park and Gardens and on the setting of the AONB. Furthermore, the submission sought the development of just one unit, however this would not make the most efficient use of the land and therefore should be resisted. Development of the site for a scheme of 5 units would create unsustainable travel patterns in order to access services, which although nearby, are not within walking distance.</p>	
Consider for inclusion in the Submission Document?	No

Site Code PHS006 & SAD23	Address Dover Harbour Sports and Social Club, Port Zone, Whitfield	Parish Hierarchy Secondary Regional Centre	Overall SHLAA Score 32 (6-10 Years)	Area 7.5 Indicative No. of units @ 30 dph = 263
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>For completeness, this form covers all the land shaded as SAD23. Part of the site is an established employment area, known as the Port Zone, and the remainder is undeveloped land, located to the south east of the site. The site comprises mainly overgrown scrub. To the south are a large number of trees. This site is allocated for employment use (B1, B2, B8) in the Adopted Local Plan and its characterised by a number of large storage sheds. Some of the business units operate over a 24 hour period so mitigating measures to reduce this impact would also have to be considered. The site may be contaminated. The site has been put forward for housing therefore the loss of employment land will need to be examined.</p>				
Policy Alignment SHLAA Score: 8.0 – Within development envelope (settlement boundaries) and/or non-housing designation or housing allocation site outside development envelope				
<p>The site is located within the urban boundary. The site is in employment use and prior to the adoption of the LAD any planning application (for a non-employment use) would be required to comply with Policy DM2.</p>				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment No considerations</p> <p>Landscape Impact The southern part of the site is in a very visible location on a plateau, relying of perimeter trees for screening, and could have a major impact on the landscape if developed. The eastern part of the site is wooded and comprises some important trees, which if removed for development, would also have a detrimental impact on landscape. Generally, the site benefits from a good tree coverage which could enable a less dense development to retain a discrete presence.</p> <p>Biodiversity That element of the site that comprises PHS006 contains buildings of an age and in an environment that indicates high suitability of bat roosting and surveys for these species is essential. The southernmost section of PHS006 is chalk grassland within the Whitfield Down and Buckland Down LWS. The field layer in the south of SAD23 and the PHS006 are both likely to support common reptiles. There are numerous important mature trees on and abutting the site. The wider SAD23 element comprises important mature trees and may support badgers which are known to occur in the general locality.</p>				

EIA Screening: Screening required under S2.10, urban infrastructure	Appropriate Assessment: In-combination Thanet Coast mitigation required. Also screening for N deposition impacts on other local SACs.
<p>Green Infrastructure</p> <p>The site currently includes a sports and social club, but this is for membership only. There are no PROW in the near, but there is potential, linked with proposed development at Old Park Hill, to create some recreational linkages to the Buckland Valley. The LWS should be protected and the chalk grassland element maintained and improved. Some of the trees are of particular landscape importance and lends a parkland ambience to the site: this should be exploited.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>From a highways perspective, the north end of the site may be suitable for development but the southern part would create a potential conflict between employment and residential traffic. Consideration would have to be given to cyclists and pedestrians through the business area. This may not be possible with current road network. Emergency access may be required dependent on the number of dwellings.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>The site is located close to major retail stores, the White Cliffs Business Park and the Port Zone business area. Bus routes to Dover town are within walking distance of this site. Dover Christchurch Academy is located less than five minutes away.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The loss of employment land will need to be considered. Due to the nature conservation interest and adjoining 24 hour noise generating employment uses, the eastern part of the site is not suitable for residential development. The southern part could be developed but is cut off from other nearby residential development by the business uses. It is also in a highly visible location in terms of prominence when viewing the site from Dover town. There is no residential development potential at this site.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS08DOV	Address Land at Wycherley Crescent and Milton Road, Dover	Parish Dover	Overall SHLAA Score 31.5 – 11 to 15 years	Area 0.56 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 17
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site				
<p>The site is very overgrown and heavily treed, with a number of mature trees on the site. To the south and north east the site borders existing residential development. From an initial observation the site slopes significantly in a north westerly direction. Contour mapping suggests that the surrounding residential land is predominately sited on one level, whilst this site has two level changes.</p> <p>The SHLAA score needs to be amended to 2.0 given that the site is located within the urban boundary.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is located within the urban boundary and within Groundwater Protection Zone 2.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
The site slopes significantly. Furthermore, it is extensively treed with a mixture of mature species and hedgerows.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
The site is an extension of a crescent sitting halfway up the Buckland Valley. Development will be seen as part of the Buckland estate and should not lead to coalescence of elements of housing on the valley-side. More locally, the setting of the development associated with the Linces is by areas of thick screening which the site is currently contributes to.				
Biodiversity				
The site is within the Whitfield Down and Buckland Down Local Wildlife Site (LWS), which is based upon chalk grassland, although the site is now predominantly scrub with trees. It is unlikely to support common reptiles or other well-known protected species. There maybe potential for offsetting development here by positive habitat management elsewhere in the LWS.				
EIA Screening: Required under S2.10		<input type="checkbox"/>	Appropriate Assessment: contribution to	

	Thanet Coast SPA mitigation strategy necessary.
<p>Green Infrastructure</p> <p>The Buckland Valley, including this site, is open access land, although the scrub nature of it hinders freedom to roam. A path runs alongside the SW boundary to the proposed site, providing a well-used link between Peverell Road and The Linces. This is likely to be used for accessing Christchurch Academy. Development proposals would have to compensate for loss of GI.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site fronts Milton Road and Wycherley Crescent, both within a 30mph speed limit. There may be issues associated with the gradient of the site in order to achieve a suitable access. No footways front the site, but they are located on the opposite side of the carriageways. Street lighting columns may need relocating along the site boundary.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>There is a nursery school at the junction with The Linces and the site is close to a bus routes where regular services operate to the town centre. Green Park County Primary School is located within a five minute walk of the site.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>The site is located within the urban boundary and is not subject to other environmental designations. The setting of the Linces is important as due to its location on the side of the valley it is visible in long distances views from viewpoints to the south west of the town, such as at Western Heights. The site is not designated open space under Policy DM25, and due to the nature of the Linces with larger properties with large front gardens, the site does not provide amenity open space to the existing development.</p> <p>In conclusion, the site is considered suitable for residential development. Due to topography the built form should be restricted to frontage development only. This would result in any change in levels predominately located within the garden of the new properties. The capacity of the site should therefore be reduced to approximately 8 units. Any development proposals would have to compensate for the loss of GI.</p>	
<p>Consider for inclusion in the Submission Document?</p> <p>Lower density</p>	<p>Yes</p>

Site Code SAD15	Address Land north of Melbourne Avenue	Parish Dover Town	Overall SHLAA Score = 27	Area = 0.54 Ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 16
Current Use Initial SHLAA Score: 1.0 – Fully occupied multiple use (eg retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site This narrow linear site fronts Melbourne Avenue, and is open to the wider countryside to both the north and south. To the immediate north the land has been put forward under reference (PHS007). Beyond this land lies the White Cliffs Business Park saved Local Plan allocation for employment uses. To the west lies Dover Christ Church Academy, and there are existing residential properties to the east. A public right of way runs alongside the northern part of the site which runs behind Durban Crescent and connects with the North Downs Way/White Cliffs Countryside Trail.				
Policy Alignment Initial SHLAA Score: 4.0 – Completely Outside Development Envelope with no other designation or non housing designation The site lies outside of the urban boundary. A Local Wildlife Site (LWS) is located on the opposite side of Melbourne Avenue.				
Physical Constraints Initial SHLAA Score: 6.0 Site with small areas of sloping land, woods or hedgerows, to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is visible in long distance views from Western Heights, although it is not particularly distinguishable as it forms part of the scrub/hedgerow that runs from Buckland valley, behind housing on Melbourne Avenue to the highly important ridgeline hedgerow linkage to those hedgerows associated with the North Downs Way. Development would be intrusive into the skyline, east of the P+O warehouse. More locally, the site offers a green break in Melbourne Avenue and development would urbanise the northern aspect of Melbourne Avenue, increasing visual coalescence between Whitfield and Dover.				
Biodiversity The site is a scrub-covered bank. The vegetation would suggest that it has established on chalk and, over time, it might be possible to re-establish chalk grassland. The site probably supports small mammals and provides roosting/refuge for common birds. It could be of significance as a part of a longer flight line for bats.				
EIA Screening: too limited to require EIA screening			Appropriate Assessment: too limited to require any assessment or contribute to any existing mitigation scheme.	
Green Infrastructure The land is not currently accessible, being scrub, aside from the PROW EB12 which runs through the site. The footpath comprises an important strategic GI link in respect of recreation, connecting the Buckland Valley to the North Downs Way, which development could jeopardise. Additionally, the scrub				

covered bank is a link across Melbourne Avenue to the Whitfield Down and Buckland Down Local Wildlife Site (LWS) with the potential to develop a biodiversity corridor alongside the PROW to join to the Long Hill and Coombe Hole, Dover LWS. The potential to join these two LWS should not be compromised.

Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Melbourne Avenue is traffic calmed, with square humps in the carriageway at staggered intervals. There are footways on both sides of the road along with street lighting. Melbourne Avenue is on a frequent bus route, with the nearest bus stop being located immediately adjacent to the western edge of the site. From here buses provide connections to Dover Town Centre and the nearby Tesco supermarket.

In order for safe access and egress to any new houses, it would be necessary for each unit to have sufficient space for turning, given that the narrowness of the site means an internal access road is unsuitable.

Access to Services Initial SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Immediately to the western boundary lies Dover Christchurch Academy. From this point, all services located within White Cliffs Business Park would be less than a ten minute walk.

Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership Initial SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Development of the site would be visible in long distance views, and would be intrusive into the skyline. The site currently offers a green break in Melbourne Avenue, and any development would increase visual coalescence between Whitfield and Dover. The site offers the potential to connect the two LWS' and this should not be lost.

Consider for inclusion in the Submission Document?

No

Site Code PHS007	Address Land between Dover Road and Melbourne Ave, Dover	Parish Hierarchy Secondary Regional Centre	Overall SHLAA Score 25 (Undeliverable)	Area 85.79 Indicative No. of units @ 30 dph = 2574
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site This is a vast area of land which stretches from the southern boundary of the White Cliffs Business Park to the railway line providing the boundary to the south and east. A small portion of the site, to the southern end, has been submitted separately for consideration as DOV24. The site undulates, with some large sloping areas and occupies a ridgeline position. There are power lines over part of the site, together with a mobile phone mast. There is also a ventilation shaft for the railway that, in running in a tunnel under part of the site sterilises the eastern boundary from development.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation The site is located outside of the urban boundary. The site adjoins the White Cliffs Business Park allocation to the north.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is very prominent when viewed from Dover town and Western Heights, overlooking the Dour Valley and providing separation of the Buckland Estate from Dover Castle. Apart from the minor intrusion of power lines, the character of the landscape is typical of the downs, albeit development at White Cliffs Business Park is compromising the ridgeline horizon when viewed from the south. Development would have a highly detrimental impact on the setting of Dover town and Dover Castle.				
Biodiversity Part of the site (to the south west) has been designated as a Local Wildlife Site (Long Hill and Coombe Hole, Dover) and is an important biodiversity component in GI of the area.				
EIA Screening: EIA would undoubtedly be necessary, under S2.10 (urban infrastructure)		Appropriate Assessment: the quantum of housing would be such that assessment would be necessary, with particular concerns for Lydden and Temple Ewell Downs SAC and Dover to Kingsdown SAC,		
Green Infrastructure				

The topography of the site will have relevance in respect of aquifer protection and prevention of surface flooding of the Dour valley and development would lessen the absorption capacity of the natural environment (ecosystem services). The North Downs Way and White Cliffs Countryside Trail runs through the site in a north-south direction and meet PRoW EB 12 creating permeability by recreational paths. The site is highlighted for increased conservation management activity in the Dover draft GI Report as it provides an important link from the coastal areas northeast of Dover to the downlands of the northwest.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access from the south is severely restricted by a narrow bridge that crosses the railway line and a single track Roman Road. There could be a possible access from the north as and when White Cliffs Business Park Phase 3 developed. Roman Road is severely restricted and unsuitable to accommodate development.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is currently some distance away from services. The site is located close to the allocated sites for Phase II and III of the White Cliffs Business Park. To the western boundary lies Dover Christchurch Academy. From this point, all services located within White Cliffs Business Park would be less than a ten minute walk.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

There is no development potential to this site. The site has very good landscape qualities and is in a prominent position so any development would have a detrimental impact (on the setting of both Dover town and Dover Castle). The site is considered to be unsuitable for future development and should be retained for landscape qualities, with part of the site designated as a Local Wildlife Site. A landowner has put forward a small portion of land at the southern end of the site (see DOV24).

Consider for inclusion in the Submission Document?

No

Site Code SAD16	Address Land south of Egerton House, Roman Road	Parish Dover Town	Overall SHLAA Score = 26.5	Area 0.63ha
		Hierarchy Secondary Regional Centre		
Current Use Initial SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site lies to the north of the railway line and within a larger site (submitted as PHS007). It is located to the immediate south of Egerton House and is currently used as horse pastures. The site is mainly flat and is bounded with hedging to the west and Roman Road to the east. Roman Road is a narrow single-track lane, which is bounded by hedgerows. Electricity wires cross the site. The site is surrounded on all four sides by open countryside.				
Policy Alignment Initial SHLAA Score: 4.0 – Completely Outside Development Envelope with no other designation or non housing designation				
The site lies outside, and some distance away, from the urban boundary. It would not be possible to logically extend the urban boundary to include this site without including a significant amount of land which is currently open countryside.				
Physical Constraints Initial SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is prominent in that it provides a green wedge between Edgerton House and the commercial paraphernalia associated with the scaffolding yard to the south. The maintenance of this space is important in preventing the appearance of untidy sprawl extending northwards into the countryside. Development would have a highly adverse impact on the landscape.				
Biodiversity The 2003 Kent Wildlife Habitat Survey indicates that the site is neutral grassland. The significance of this is unclear, but highlights the need for any development proposals that come forward to be accompanied by a biodiversity survey. The neighbouring scrub-covered hillside to the west was cleared in 2008, removing any interest that may have resided there. The site may form a significant link between two parts of the Long Hill and Coombe Hole, Dover LWS.				
EIA Screening: Screening for urban infrastructure (S2.10) required			Appropriate Assessment: site is sufficient to require contribution to the Thanet Coast mitigation strategy.	
Green Infrastructure The site is important for biodiversity and landscape integrity of GI linking Long Hill to sites to the east,				

together with maintaining the ambience of the North downs Way national trail. Development would be harmful to the wider interests of GI.

Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The only access to the site is along Roman Road, a single track, from Old Charlton Road. The track is partially unmade and there are a limited number of passing places. The footways end at the junction with Old Charlton Road and do not continue up Roman Road. The bridge over the railway would be sufficient in isolation. However, the lane leading to it in both directions is not of a sufficient width to support additional development.

Access to Services Initial SHLAA Score: 1.0 – Site with no public transport, GP surgery and school within 10 minutes walk

Given the isolated location of the site, surrounded by countryside on all sides, access to services would be predominately by car. The nearest school is St. Edmunds Catholic School which would be approximately a ten minute walk, although there are no footways. Other facilities, such as a GP Surgery and shops and services are located within Dover town centre.

Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership Initial SHLAA Score: 4.5 – Single Private Ownership

Analysis

There is no development potential to this site. The site, and its setting, have very good landscape qualities, is located in a prominent position, and is important for biodiversity. Furthermore the road network immediately surrounding the site is not of sufficient width to accommodate any additional development. To conclude, any development would have an adverse impact on the countryside and would cause harm to the wider interests of maintaining a GI network.

Consider for inclusion in the Submission Document?

No

Site Code SHL079	Address Garage site to south of road, Dunedin Drive, Dover	Parish Dover Town Council	Overall SHLAA Score 35.5 (6-10 Years)	Area 0.26 ha Indicative No. of units @ 30 dph = 8
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>This site comprises 36 garages arranged in a linear manner with hard standing in front and with steep scrubland behind (which is within the site area). These garages are currently very poor urban form, being a low density land use and do not enhance the character of the urban area. The garages are tenanted on short notice tenancies, so vacant possession could be obtained at short notice. It is understood that the garages are used for storage, rather than car parking. To the north and west lies existing residential development.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p> <p>The site is located within the urban boundary.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Beyond the garage blocks the land slopes steeply to the rear and is heavily treed. For development to take place it may be necessary for some of this area to be removed. However, if this was to occur, and development was in the form of units with garden areas then there may be issues in connection with a sense of oppressiveness resulting from the trees located above.</p> <p>If development was permitted, nos 27-33 (opposite) will need to be safeguarded in terms of overbearing and overlooking issues. Consequently, this may limit the development potential. It would also be necessary to retain the landscaping to rear.</p> <p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>Any development should reflect the existing urban, with density height and massing to reflect the surrounding buildings.</p> <p>Landscape Impact</p> <p>The trees located above are in scrub over chalk grassland, the removal of some of these trees would be subject to negotiation. If development requires a greater depth to the site, this may require excavation and loss of trees/shrubs. This is only of significance in the west where the site backs onto properties in Hobart Crescent. An assessment of this relationship should be included within a landscape assessment. Elsewhere there is sufficient depth of hillside to accommodate minor losses.</p> <p>Biodiversity</p> <p>Long Hill and Coombe Hole LWS lies to east above the bank. The bank itself is mainly scrub, but given the general location, a biodiversity survey would be essential, for chalk flora and common reptiles, in particular. The garages are unlikely to support bats. If excavation of the bank were necessary, it may be possible to undertake a small amount of chalk grassland enhancement.</p>				
<p>EIA Screening: below the trigger (0.5ha) for <input type="checkbox"/> Appropriate Assessment: below the trigger <input type="checkbox"/></p>				

EIA screening	level to contribute to in-combination mitigation
<p>Green Infrastructure</p> <p>The site is part of a swathe of steep, scrubbed-over hillside that lies between the Buckland Estate housing and Long Hill and is within the Lydden/Dover escarpment GI artery requiring increased conservation management, the site itself does little to contribute to this. The hillside shows no signs of recreational use and biodiversity interest is probably quite limited. Development here would provide an opportunity for enhancement of on- and off-site biodiversity GI.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site is located immediately adjacent to Dunedin Drive, and therefore access would be achievable. It appears unlikely that the parking required for any new units could be accommodated in a suitable fashion within the existing highway. Additional demand for parking would also be generated if the existing garages are being used for parking, as this parking would be lost as a result of the development. It is however understood that the garages are being used for storage. Furthermore, the properties located opposite the site are of relatively recent construction with private drives.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>At the time the SHLAA was carried out the County Primary School at Melbourne Avenue was open, however it has now closed.</p> <p>The site is within a five minute walk from a bus stop, with frequent services both to Dover Town centre and to the employment and facilities located in White Cliffs Business Park.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>This site has the potential for either housing or flatted development. Although, as noted, if a garden area was required then there may be issues in connection with shading.</p> <p>Any development would be subject to negotiation in connection with the retention of trees/screening on upper levels. Frontage development may be one option, but the depth of the site needs further investigation. Should the site be allocated, then a biodiversity survey would be essential for submission as part of any planning application.</p>	
<p>Recommend for inclusion in the Submission Document? Yes</p> <p>Requirement for biodiversity survey More detailed landscape assessment (assess and mitigate any landscape impacts)</p>	

Site Code NS02DOV	Address Land North of Frith Farm, St. Martin's Road	Parish Dover	Overall SHLAA Score 29.5 – (15+ years)	Area 0.22 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 7
Current Use SHLAA Score: 1.0 Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site				
<p>The site is located to the north of Dover. Residential properties are located to the north and east which are located within the urban boundary. Farm buildings are located to the south of the site, and these along with the site are located outside of the urban boundary. To the west lies the saved Local Plan employment allocation for Phase 3 of the White Cliffs Business Park, which has not yet been developed.</p> <p>The site is currently accessed from St. Martin's Road, a single-track unadopted road. There are two buildings on the site, one is thought to be an air raid shelter the other is a former stable block. The site comprises overgrown scrub, with the land sloping from west to east.</p>				
Policy Alignment SHLAA Score: 6.0 Partially outside development envelope with no designation				
Part of the site is located within the urban boundary, but the majority of the site is located outside of the confines. The site is located immediately adjacent to the White Cliffs Business Park Local Plan allocation.				
Physical Constraints SHLAA Score: 8.0 No obvious physical constraints				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
Although the landscape to the west is currently open agricultural land, this land will not remain so since it is allocated for employment uses (B1/B2/B8) to form part of the White Cliffs Business Park. Due to this designation and the extensive boundary of mature trees any development of the site is likely to have limited landscape impact.				
Biodiversity				
The site has not been assessed under the Kent Wildlife Habitat Surveys, but appears to be improved grassland (Google Earth, 2007, accessed August, 2011). The site contains agricultural buildings and is in an area that has structural vegetation that could support bats, and a scoping survey for such would be essential. Nearby at Frith Farm there is a large pond and a habitat suitability assessment for great crested newts would be necessary.				
EIA Screening: Too small a site		<input type="checkbox"/>	Appropriate Assessment: Too small a site	

Green Infrastructure	
The site is on a cul-de-sac – St Martin’s Road, but distant from any countryside footpaths. GI is unlikely to be a material consideration in taking this site forward.	
Proximity to Road Network SHLAA Score: 5.0 Less than 5 metres from road assuming direct access to site	
St. Martin’s Road is unadopted, and comprises a single track without passing spaces. It currently serves a terrace of eight properties and will in future serve an additional, recently consented, detached dwelling. It is likely to be unsuitable for serving further residential development since the road is narrow and unmade.	
Access to Services SHLAA Score: 2.0 Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk	
A bus stop is located within a ten minute walk of the site. The Duke of Yorks Military School is just over a ten minute walk from the site, although this is a state boarding school which is seeking to become an academy. The nearest GP surgery and railway station are located in Dover which is approximately half an hour by foot. The hamlet of Guston is located to the north of the site, and to the north of the A2. Facilities are limited to a village hall, church and public house.	
Market Attractiveness SHLAA Score: 3.0 - Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Whilst the site is located immediately adjacent to the urban boundary the site is some considerable distance from any current facilities and its location would be more appropriately defined as a hamlet. As a consequence of this isolated location development would result in unsustainable travel patterns. This is further compounded given there is no access to the A2 at Guston (the road goes over the A2). It must be recognised that the proximity of the WCBP will alter this area when it is fully developed.	
Consider for inclusion in the Submission Document?	No

Site Code SHL029	Address Cophorne, Dover Road, Guston	Parish	Overall SHLAA Score 26.5 (Undeliverable)	Area 0.22 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>This residential property and associated curtilage lies to the south of the A2 (which at this point is within a cutting) and fronts Dover Road, Guston. The property is surrounded by agricultural fields. The land to the west is allocated as part of Phase III of the White Cliffs Business Park (WCBP) although it has not yet been developed. The site is well screened behind trees located alongside Dover Road. The grounds of the Duke of Yorks Royal Military School are adjacent to the site to the east and south.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p>				
<p>Outside but adjacent to the urban boundary, which has been drawn to include WCBP. A small north eastern portion of the site is covered by Saved Local Plan Policy TR4 which safeguards land within a corridor for the dualling of the A2.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>The site is located close to the A2, consequently noise pollution could be an issue.</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment No considerations</p>				
<p>Landscape Impact The site is located in the countryside with limited tree cover to the east. Development in this location would introduce urban form into a rural setting which would be detrimental to the wider landscape. While the relative isolation of the site may change with the build-out of WCBP 3, it would remain an anomalous location for housing at the density indicated. Additionally, access to WCBP 3 would be from the NW, and it could be expected that a substantial landscape buffer would be used to retain the rural nature of Dover Road in the vicinity.</p>				
<p>Biodiversity The site lies at the centre of a network of hedge and tree lines and this could make it significant in terms of bat habitat. Any developer would have to undertake a scoping survey as part of any planning application.</p>				
EIA Screening: too small to be required		Appropriate Assessment: too small to be screened		
<p>Green Infrastructure A public right of way, ER58, runs adjacent to the northern boundary of the site and this forms part of a wider circular network with the A2 as its axis. Development would have to respect the setting of this PRoW.</p>				

Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility

The site is within a national speed limit and has poor visibility given that it is on a bend and the site is lower than the road. The sight lines are an issue as the site is on the inside of a bend and outside any restricted speed limit it is likely that additional land outside the site confines will be needed to achieve an acceptable splay. It is therefore doubtful that an acceptable access could be achieved. A private access road runs parallel to Dover Road. Application DOV/10/00808 for 1 unit demonstrated that access from this private road would be possible.

Access to Services SHLAA Score: 2.0 – Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk

The SHLAA score reflects the location of a bus stop at Connaught Barracks which would just be within a ten minute walk of the site. Dover Road does not, however, have footpaths and the road is narrow. Duke of Yorks Royal Military School is within a five minute walk of the site, although this has strict admissions criteria. Guston Primary School, located within Burgoyne Heights, would also be a ten minute although there are concerns regarding pedestrian safety as there are no pedestrian footways.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is in an isolated position with no facilities close by and has poor access. The property is located within the hamlet of Guston which is not suitable for further development unless it functionally requires a rural location (Policy CP1). If the site was developed there would also be a detrimental impact on the surrounding countryside. Although the site is located on the opposite side of the road the urban boundary, this has been drawn specifically to include WCBP. It is not intended that there would be any traffic from WCBP entering the site from Dover Road.

Since this analysis was undertaken the site has been granted planning permission for one residential property, located to the south of the existing property. Please see planning application DOV/11/01087 for additional details.

Consider for inclusion in the Submission Document?

No

Site Code PHS004	Address Land north of A2 and west of A258 and east of the railway	Parish Dover Town	Overall SHLAA Score = 26	Area 46.37 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 1391
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site is located immediately to the north east of the A2 and to the west of the A258 (Dover-Deal road). To the west is the railway line, which runs alongside the northern portion of the site before entering a tunnel to the south western side of the site. From the A258 there is no visual screening of to the site, thus meaning there are far reaching views across the site and beyond to the hamlet of Guston. The site slopes gradually from the A258 in a westerly direction. Immediately beyond the A258 to the east lies the AONB. To the north east the site is bounded by a dense line of trees/ shrubs and beyond that Hangman’s Lane. There are a collection of buildings beyond this lane, including Guston Mill. Lying diagonally across the site is a dismantled railway line, which was a branch line from Dover Docks to Martin Mill and lies partly in a deep cutting with tree cover. These trees are protected.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site is located some distance from the urban boundary, and one field away from the hamlet of Guston which does not have settlement confines. To the south, alongside the A2, land is safeguarded for the A2 dualling (Saved Local Plan Policy TR4).				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
It is understood that part of the site was a former waste disposal site. The site is located immediately adjacent to the AONB and any development would affect its setting.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The disused railway is a Heritage Asset, and development of the site would have significant implications on its setting.				
Landscape Impact The AONB lies immediately adjacent to the site across the A258. Development of this site would greatly affect the setting of the AONB, bringing detrimental issues of urbanisation and further night sky pollution. More generally, there are far reaching views across the site from the A258 to the hamlet of Guston and the wider countryside and development here would have an adverse impact on the landscape character.				
Biodiversity Biodiversity is predominantly limited to marginal features – hedges and verges, although the railway cutting is of importance as a wildlife refuge and supports a woodland chalk flora. The general area supports a number of farmland birds.				

EIA Screening: required under S2.10	Appropriate Assessment: a full range of assessments would be required, given the proximity of a number of European sites.
<p>Green Infrastructure</p> <p>A number of footpaths cross the site (ER56, 59 and 61) and the disused railway cutting is a landscape feature. Development would require extensive GI provision, including ground water protection and surface water controls. These, in turn, could enhance biodiversity. Allowing for this at the same proportion as for Whitfield would substantially reduce the housing number that the site could support.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site is bounded by the A2 (south), A258 (east) and north (Hangman’s Lane). The A258 is the main Dover-Deal road and is restricted (for most of this length) to 50mph. There are no footways along the A258. There is a high crash record on the A258 and there would be problems with junction spacing from the Duke of York Roundabout. There is likely to be a policy objection under DM12 of the Core Strategy and as such it is highly likely that KCC would resist a new access on either the A258 or Hangman’s Lane.</p>	
<p>Access to Services SHLAA Score: 2.5 – Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The nearest services are located immediately adjacent to the Duke of Yorks roundabout. A public house and petrol station would provide basic facilities. The nearest school is the Duke of Yorks Royal Military Boarding School, although admissions are heavily controlled. The nearest state primary school would be Guston Primary School, located in Burgoyne Heights, although this would not be within walking distance since it would be too dangerous for pedestrians to cross the Duke of Yorks roundabout.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is not suitable for residential development since it lies some distance from the urban boundary. Any development would have a detrimental landscape impact particularly given the adjacent AONB. Furthermore, KCC Highways would have an objection to development of the site on the grounds that junction spacing would be problematic particularly given the high crash records on the A258.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS13DOV	Address Land to the west of Duke of York's School	Parish Dover Town Council	Overall SHLAA Score 29 +15 Years	Area 7.20 Ha Indicative No. of units @ 30 dph = 216
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Triangular, flat, piece of agricultural land and open space/sports pitch located to the east of Dover town and forms part of the Duke of York's School complex. The site has an area of scrub in the middle where the agricultural land meets the playing pitch, and a line of trees running across the southern tip of the site. Apart from a group of trees/scrub, there appears to be no physical delineation to the site on the eastern boundary (the railway tunnel, which runs under the associated grounds of the school, has been used to define this) and the land continues as playing fields. The site has dense tree/scrub cover along the western and northern boundaries.</p> <p>To the north of the site there is an agricultural field, beyond which there is the A2. Dover Road runs directly along the western boundary line. Further west, land uses consist of a small residential area, a farm and agricultural land. The agricultural land has been allocated for Phase III of the White Cliffs Business Park. The school buildings are located to the south east of the site. Apart from the gate houses (located at the southern most tip of the site), the school buildings do not abut the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p>				
<p>The site is located outside of the urban boundary. Although the land to the west is allocated for the third phase of the White Cliffs Business Park, this has not been developed and is still in agricultural use. The site is, therefore, currently divorced from the urban area.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are Listed Buildings located within the grounds of the Duke of York's Royal Military School to the east of the site. Development at this scale would have a detrimental impact on the setting of the listed school buildings. If the site boundary was revised, at the most eastern point, and reduced so that it ended with the track to the east then this impact would be significantly reduced.</p>				
<p>Landscape Impact</p> <p>The tree line along the western and northern boundaries would provide some screening but a section would have to be removed to provide access and the required sight lines. Development at this scale, however, would still be visible from longer distances and would have a detrimental impact on the wider landscape when set against the otherwise general openness of the landscape, particularly when viewed from the A2.</p>				
<p>Biodiversity</p> <p>The site has only limited biodiversity potential – field layer being either improved grassland or arable. However there are a number of trees and scrub which will provide some wildlife opportunities, such as common reptiles. An ecological scoping survey would be needed but biodiversity would not appear to be a hindrance to development. There is a pond at Frith Farm, within 50 metres of the site, and the habitat suitability for great crested newts would need to be determined. Likewise, the use of tree and</p>				

scrub belts within the site for use by bats needs assessment.	
EIA Screening	Appropriate Assessment
<p>Green Infrastructure</p> <p>The site is within the grounds of a school and not accessible to the public. Therefore the GI contribution is limited to the ambience provided for footpath ER 58 which runs along the northern boundary between the site and the A2. Although the site is bound by high security fencing, the green space within the school grounds contrasts well with the intense traffic noise and volume on the A2. Loss of the green space would further diminish the ambience and usefulness of the footpath.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The frontage of the site is onto Dover Road and abuts a Public Footpath (ER58). Dover Road is of varying width but narrows along parts of the site frontage but it still has a national speed limit of 60mph in this location. Full sight lines will, therefore, be required of 160m x 2.4m x 160m. These would be achievable but would require the removal of the trees/scrub along the western boundary (check).</p> <p>There is no footway fronting the site and the provision of one would not be of benefit as a new stretch would not connect with any other existing pedestrian footways. The site is unsustainable in terms of walking and public transport (6 journeys weekdays, no evening or weekend services).</p> <p>A Transport Assessment and Travel Plan would be required before any development could commence.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The site is located close to the Duke of York’s school, which is seeking to become an Academy, and to the Guston CE Primary School. There is also a bus route but this not frequent (see comments above).</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>Although a suitable access to the site would be achievable and the site is partially screened, the location is divorced from Dover town and public transport is poor. Development would also have a detrimental impact on the wider landscape and the setting of the Listed Buildings within the school.</p> <p>For these reasons, development would not be suitable.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS14DOV	Address Land to the south of Duke of York's School	Parish Dover Town Council	Overall SHLAA Score 27.5 Undeliverable	Area 9.39 Ha Indicative No. of units @ 30 dph = 282
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Rectangular site located to the east of Dover Town on land currently within the Duke of York's Royal Military School. The site is located to the south of the main school buildings, along the boundary with the residential properties (formerly MoD) of Burgoyne Heights. The site spans from the Dover Road to the west to the A258 to the east. There is a line of residential properties located on the far side of Dover Road. There is a row of mature trees running the length of the western, southern and eastern boundaries.</p> <p>Overall the site appears to be flat but it does start to fall in the east near to the A258. The site consists of managed grass/lawn, tennis courts, cricket pitches and maintenance yard, reflecting its current recreational use.</p>				
<p>Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation</p> <p>The land is located outside of the urban boundary and does not adjoin them. The nearest urban boundary surrounds Connaught Barracks, which is to the south of the site.</p> <p>The site is also designated as open space on the Proposal's Map. Policy DM25 (retention of open space) in the adopted Core Strategy, therefore, applies.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are 16 school buildings that are Listed. These are located north west to north east of the site. Development at the scale envisaged would have a detrimental impact on the setting of these listed school buildings.</p> <p>Landscape Impact</p> <p>The orientation of the proposed development would have a visual impact on the housing at Burgoyne Heights, but less so on Guston Road or the A258, although in the latter case, beyond the road is AONB and there will be some limited impact on the setting of the AONB. There is reasonable screening by trees to east, south and west. More significant would be the change in character of the wider area as housing would become the predominant form over green space.</p> <p>Biodiversity</p> <p>The site has limited biodiversity. There may be bat interest associated with the tree lines and habitat suitability for great crested newts would need to be assessed, given the proximity of the pond at Frith Farm. The site falls away to the west and is no managed. This relatively small area is likely to support common reptiles.</p>				
EIA Screening: S2.10 screening necessary.			Appropriate Assessment: There would be major concerns regarding nearby SACs and assessment would be necessary. Also, a	

	contribution to the Thanet Coast Mitigation strategy would be required.
Green Infrastructure	
The land is entirely enclosed in school grounds. Development would require consideration of open space provision, swales and groundwater protection matters. Any replacement for lost playing fields should be accessible to public, to provide an improvement and contribution to wider GI.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The original submission has not suggested using the existing accesses currently used by the school. A new access would, therefore, have to be considered from either the Dover Road to the west and/or the A258 to the east.	
The frontage with Dover Road falls within a narrow section and within the National Speed Limit (60mph). There is also poor alignment of the carriageway along this section and it is unlikely that sight lines would be unlikely to be achieved without removal of sections of the established mature tree line. No footways exist along this section of Dover Road to connect into.	
The western side fronts the A258 in a 60mph speed limit. Sight lines are unlikely to be achievable due to the alignment of carriageway. The site is unsustainable in terms of walking and public transport (6 journeys weekdays, no evening or weekend services). Bus provision is good (2 per hour weekdays, no evening service, 2 per hour on Saturdays, no evening service, 2 hourly on Sundays with 1 evening journey). No footway on the side of the development but a footway exists on the far side (south) of carriageway.	
The site should be discounted as it outside any restricted speed limit (except national limit) the frontage to A258 is on a section with a crash record (in last 3 years). Access off Dover Road Guston not suitable the existing school access is also unsuitable due the increased use and its close proximity to the Duke of York roundabout.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is located within the Duke of York’s school, which is seeking to become an Academy, and to the Guston CE Primary School. There are two possible bus routes, poor provision on Dover Road or good provision along the A258 (see comments above).	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
Development of this site would have a detrimental impact on the setting of the Listed Buildings located within the school and there is no possibility of providing a safe access onto the site. Development of the site would not, therefore, be suitable. The site is also identified as open space on the Proposals Map and the site is poorly served by public transport and footways to the town.	
Consider for inclusion in the Submission Document?	No

Site Code NS15DOV	Address Land adjacent to Burgoyne Heights Community Centre	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 27.5 Undeliverable	Area 1.33 ha Indicative No. of units @ 30 dph = 40
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation.				
Description of Site Flat, circular shaped, grassed, amenity space located within the former MoD residential development of Burgoyne Heights. Burgoyne Heights consists of residential properties grouped together in cul-de-sacs with open spaces between. These are positioned around one large open space (the site in question) and a community centre. Burgoyne Heights is located north of Fort Burgoyne, a Scheduled Monument. There is a wooded area between the fort and residential development. Land surrounding the fort and the former barracks has been allocated in the Core Strategy for residential development (Policy CP10). The land immediately to the south east has been identified for the provision and enhancement of play equipment, and beyond this the former playing fields will remain as open space.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation The site lies outside of the urban boundary, and is designated as Open Space on the Proposals Map. Policy DM25 of the adopted Core Strategy would therefore apply.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment Fort Burgoyne, a Scheduled Monument, is located due south of Burgoyne Heights. As there is already residential development and wooded area between the site and the Monument, it would be unlikely that additional development would have a detrimental impact. Properties at Burgoyne Heights are grouped around cul-de-sacs and back onto the main access road. Further development would either ‘front’ the road and overlook the rear gardens of the existing, or would back onto the road themselves. Unless new development produced another cul-de-sac, it would be against the grain of the current urban form. Landscape Impact				

The site is located within a residential area and is surrounded by some form of development. There would be little impact on longer landscape views if this site was development.

The site was created as amenity space as part of the original residential development (which focused on cul-de-sacs grouped around open areas) and does, therefore, contribute to the character of the area.

Biodiversity

The intensively managed grass land is unlikely to be significant for biodiversity.

EIA Screening: S2.10 screening would be necessary.

Appropriate Assessment: There would be in-combination impacts with Connaught Barracks to be assessed. Development would also need to contribute to the Thanet Coast SPA mitigation strategy.

Green Infrastructure

Although there are no PROW on the site, it is clearly used in combination with the playing fields to the southeast and thus the site provides valuable open space within the existing residential development.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access is achievable as the site is within a 30mph speed limit and the necessary sight lines could be created but junction spacing will need to be considered as there are three entrances to cul-de-sacs opposite site. The existing street lighting columns may need relocating but this would not preclude development.

A footway borders the proposed development land but there are no footpaths to Burgoyne Heights from the town.

The Local Bus route (593) is a limited service supported by KCC connecting Dover and Deal. Alternative service runs along A258 and is part of the stagecoach diamond route (Dover, Deal, Sandwich and Canterbury).

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk.

Guston Church of England Primary School is located at the entrance to Burgoyne Heights and is, therefore, within five minutes walk away. Burgoyne Heights also has a community centre, which is adjacent to the site. The bus stop is also within five minutes walk away, being adjacent to the Community Centre. There are no shops in this area, the nearest are in the town centre.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Although the site scores well being located close to a school and public transport routes, Burgoyne Heights is in a location that is divorced from the main town with no footways (the distance from the site to the town would be too far in the first instance). Development would, therefore, encourage the use of the private motor vehicle. In sustainability terms this site would not suitable.

The site is also identified as public open space which, if lost, would be to the detriment to the amenity of the surrounding properties. In addition any development of the site would also potentially conflict with the current urban form.

The site is, therefore, unsuitable for further development.

Consideration for inclusion in the Submission Document?
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No

Site Code SHL095	Address Land at Stanhope Road, Dover	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 30.5 (11-15 Years)	Area 0.88 ha Indicative No. of units @ 30 dph = 26
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>This site is located in a predominately residential area, lying south of the railway line. It is designated in the Core Strategy as open space and is located within the urban confines. The site is overgrown scrubland, and it is clearly marked that it is KCC land with no public access. A maintenance/management scheme may be required from KCC to open the land up for public use. However, prior to this it will be necessary to ascertain if the open space requirement still exists.</p>				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park				
<p>The site is located within the urban boundary, and is protected Open Space. Any development of the site would be required to comply with Core Strategy policy DM25 ‘Open Space’.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>The site lies adjacent to the railway line, therefore noise/vibration will need to be investigated. There is also noise from scaffolding yard and neighbouring commercial uses. This site has a direct view point from Western Heights</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>The site is clearly visible from Western Heights. However, to the north of the site is a loose agglomeration of built form (scaffolding yard, allotments etc.) which would ameliorate the impact of infilling the ‘Y’ Between Stanhope Road housing and the backs of housing on Astley Avenue. The site boundaries comprise scrub and trees and a few further trees (Hawthorn, probably) occur in the more central part of the site. The use of some of this structural vegetation to break the built form and reduce the density of dwellings would allow the site to merge into the general vista.</p>				
<p>Biodiversity</p> <p>The site will hold common reptiles and maybe important at a local level for common birds. Being unmanaged, the field layer flora component is rank and will hold few species of interest. It is unlikely that biodiversity issues would militate against development. A biodiversity scoping survey would be required.</p>				
EIA Screening S2.10 urban infrastructure screening required		Appropriate Assessment: in-combination Thanet Coast SPA mitigation required.		
<p>Green Infrastructure</p> <p>The site is clearly used by locals (Google Earth 2007, accessed 2011) with an evident circular path indicative of dog-walking. As such it provides a local GI resource. However, it is also subject to fly-</p>				

tipping. Levels of current usage should be ascertained in order to determine the suitability of housing as opposed to open space. In the wider context of GI, it forms part of the hillside above Dover which is highlighted as needing active conservation. However, being on the town side of the railway divorces it somewhat from more strategic GI. If housing were to be taken forward here, an analysis of how GI north of the railway could be enhanced for local usage.

The importance of this site for open space in the highly developed ward of Buckland should be recognised, as should its potential for providing amenity greenspace to residents of the Mayfield Avenue/ Heathfield Avenue/Astley Avenue area. Although the site is fenced off, it is clearly being used by local residents for purposes such as dog walking.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is located to the north of Stanhope Road, with the road stopping at the boundary to the site. Therefore, it would be possible to extend this road into the site. If development were to take place it would require a turning head.

Stanhope Road already serves in excess of 50 dwellings. Stanhope Road is very heavily parked on both sides and protected passing areas are therefore likely to be required if substantial additional traffic is to be accommodated. May need to extend parking restrictions at junction with Barton Road to secure visibility for increased use of junction.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

GP Surgery is located in the High Street, and a variety of Primary Schools are within a five minute walk. The nearest bus stop is located outside St. Edmunds School providing a service to the town centre, however this is easily within walking distance. There are a number of facilities on offer in the town centre including the Dover Discovery Centre, and Dover Priory railway station.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Due to the topography of Dover the site is exposed and is visible in long distance views, such as from Western Heights. Any development proposal will need to carefully examine the grain, density and layout. It is important to ensure the trees located on the northern boundary are kept, therefore a tree survey may possibly be required. The site is covered by Policy DM25 and emerging green/open space standards suggest a shortfall within the ward (Buckland). Coupled to the access concerns it is not considered this site should be brought forward for development.

Consider for inclusion in the Submission Document?

No

Site Code LDF06	Address Charlton Green Sorting Office, Frith Road & Maison Dieu Road	Parish Hierarchy Secondary Regional Centre	Overall SHLAA Score 37 (0-5 Years)	Area 0.69 ha Indicative No. of units @ 30 dph = 34.5
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>The site consists of an existing two storey building, formerly used as the main Post Office sorting office. The site occupies a prominent location on the corner of Frith Road and Charlton Green, and currently suffers from road noise, since this part is on the main one-way system in Dover. To the west of Charlton Green, on the opposite side of the road, is the River Dour and an edge-of-centre retail park. To the north is the existing residential development that fronts Frith Road. The rear gardens of residential properties that are located on Salisbury Road immediately adjoin the boundary of the site. These are elevated, which means that they overlook the site.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p>				
<p>The site is located within the urban boundary of Dover. The site was last in use for employment and prior to the adoption of the Land Allocations document any planning application for a non-employment use would need to comply with Policy DM2.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p>				
<p>A contamination assessment needs to be carried out to ascertain whether there are any historic contamination issues.</p>				
<p>Flood Risk</p>				
<p>A desk top assessment of historic flooding has highlighted that this area be at 'high risk' with flooding occurring regularly. A detailed Flood Risk Assessment (FRA) will need to be undertaken and this must include a detailed hydraulic model to accurately assess the flood risk in this area.</p>				
<p>Historic Environment</p>				
<p>The site lies close to the projected line of the Roman Road linking Dover with Richborough Castle which means that there may be potential for significant archaeological remains on the site.</p>				
<p>Landscape Impact</p>				
<p>The site is entirely urban and occupies a very prominent position on the A256. As such there is the potential for a major townscape feature.</p>				
<p>Biodiversity</p>				
<p>The River Dour lies on the other side of the A256 and Charlton Green Cemetery lies to the NW. The site itself has little to indicate any biodiversity interest, but an assessment for bats should be made. Sensitive redevelopment could include urban biodiversity enhancement</p>				
EIA Screening: urban infrastructure (S2.10) screening required.		Appropriate Assessment: need to contribute to in-combination mitigation for potential impacts on Thanet Coast SPA		
Green Infrastructure				

The central urban location of the site limits both the existing GI and the potential for enhancement. The flood-risk issue could either be a constraint or an opportunity for some limited GI, depending on its severity and the opportunities for amelioration.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Vehicular access to the development should be located off a single access off Charlton Green.

The site frontage onto Salisbury Avenue is limited and any new access here would need to comply with junction spacing standards ie. no new junction or access point within 20m of a distributor road (Kent Design). Any new junction onto Salisbury Avenue would also displace existing on street parking. An access permitted from Charlton Green is preferred.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

The site lies in very close proximity to Castleton Retail Park which offers a number of retail units, including a Morrisons and Asda supermarkets. Charlton Primary School is located within a five minute walk, together with a GP surgery on the high street. There are a number of bus stops located on Maison Dieu, however the town centre is only a short walk away, and offers a number of services and facilities which includes a railway station.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site lies within an urban setting, and consequently may be suitable for a wide range of uses.

The existing building is not considered to be worthy of conversion to residential. Development of the site would therefore require demolition and rebuild.

As the site is located on the edge of an existing residential area it is considered to be most suitable for residential redevelopment, with access taken from Charlton Green.

Consider for inclusion in the Submission Document?

Yes

Opportunity to create townscape feature ie. landmark building.

Site Code SHL001	Address Land to the rear of Eclipse Recovery Services, Maison Dieu Road	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 33.5 (6-10 Years)	Area 0.26 ha Indicative No. of units @ 30 dph = 8
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>A triangular site to the rear of Southern Housing Group site. The site has no access aside from through the site at the front, which is currently being developed for 40 residential units.</p> <p>The site lies within the urban boundary, and is bounded by an existing terrace of houses along two sides. An alleyway, runs alongside the eastern side, although this is outside the boundary of the site submitted to the Council.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is located within the urban boundary.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
There would be significant overlooking issues because of adjacent properties; therefore the whole site would not be suitable for redevelopment.				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>Landscape impacts are restricted to views from the surrounding properties.</p>				
<p>Biodiversity</p> <p>The site has not been accessed, but is likely to support common reptiles (especially slow worms) given its current usage. Reports of bats near the access to the site were made some years ago, and it is possible that bats may forage on the site.</p>				
EIA Screening: under the threshold for S2.10		Appropriate Assessment: under the threshold for consideration		
<p>Green Infrastructure</p> <p>The site is currently GI – allotments and the use would appear to be high (Google Earth 2007, accessed 2011). The catchment for these allotments needs to be determined in order to ascertain whether appropriate provision can be made elsewhere, otherwise there would be an unacceptable loss of urban GI.</p>				

Proximity to Road Network SHLAA Score: 3.0 – Backland, land take required in an urban area including potential ransom strips	
The only access, which is in third party ownership, is via an alleyway fronting the junction of Salisbury Road and Park Avenue, this is not an existing access as has no dropped kerb and access is too close to the junction. A possible access could be created through the site fronting Maison Dieu Road, but this would involve third party land.	
Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school	
The site lies in very close proximity to Castleton Retail Park which offers a number of retail units, including a Morrisons supermarket. Charlton Primary School is located within a five minute walk, together with a GP surgery on the high street. There are a number of bus stops located on Maison Dieu, however the town centre is only a short walk away, and offers a number of services and facilities.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
In light of the difficulty in accessing the site, which can only be achieved if a right of access was reserved in the site fronting Maison Dieu Road, this site is not being recommended for further consideration. The Southern Housing Group's scheme shows car parking areas along their northern boundary which would need to be removed in order to gain access to the site. In any event, the significant overlooking issues presented by the properties which face the site would mean that a large proportion of the site could be undevelopable.	
Consider for inclusion in the Submission Document?	No

Site Code UCS003	Address Area of open space adjacent to the Roman Painted House, York Street	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 35 (6-10 Years)	Area 0.27 ha Indicative No. of units @ 30 dph = 8
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>The site is located on the north east side of York Street to which it has limited frontage. York Street is a dual carriageway road connecting Townwall Street to the south with Folkestone Road. The Dover Discovery Centre is located to the south and to the north the Roman Painted House and adjacent KCC car park. To the east the site is bounded by a number of commercial properties which front onto Cannon Street.</p> <p>It is an irregular shaped site, sloping gradually down from west to east, laid to grass. The site is currently fenced off with security gates, is well maintained, and contains no buildings or structures.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p> <p>The site is located within the urban boundary and contains two Scheduled Monuments.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>The site contains two Scheduled Monuments.</p> <p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment The site contains two Scheduled Monuments, with a recorded find of 13th Century coins located within the site. In addition, three more Scheduled Monuments are situated close by. The site and the immediate area is covered with Roman remains of buildings, an altar and marble head. It is a very sensitive archaeological area with an exposed archaeological monument, the remains of the Church of St. Martin's le Grande. Any development of this site would need to be very sympathetic to both buried archaeological remains and to the amenity of the exposed monument remains.</p> <p>Landscape Impact Being contained within the urban environment, there would not be any landscape constraints to development.</p> <p>Biodiversity There would appear to be no biodiversity issues or constraints to developing this site</p>				
EIA Screening: Site is large enough to require S2.10 screening		Appropriate Assessment: size is sufficient to require contribution to in-combination Thanet Coast SPA mitigation		
<p>Green Infrastructure</p> <p>The site does not contribute to GI and development would be isolated. There are no realistic GI opportunities or constraints to development.</p>				

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility	
Although there would appear to be vehicular access to the site from Cannon Street, this is a pedestrian thoroughfare which, together with the adjacent Market Square to the south, is a traffic free area. This would not be a suitable main access for the site.	
An alternative access could be provided from the north via New Street over the adjacent car park in respect of which we understand the District Council may have rights of access.	
Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school	
The site is located within a five minute walk of Dover town centre, with a number of services and facilities on offer. A GP surgery is located on the High Street, and there are a number of bus stops offering a variety of destinations. St. Mary's Primary School is located within a ten minute walk of the site, as is Dover Priory Railway Station which provides services to Folkestone, Ashford, Canterbury and beyond to London.	
Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
The site is located within close proximity to Dover town, where any number of services and facilities are located. If this site were developed then issues such as air quality and noise would need to be investigated. Given the two Scheduled Monuments are located within the site, any development of the site would be restricted. There are also concerns regarding whether a suitable access could be achieved.	
Consider for inclusion in the Submission Document?	No

Site Code SHL037	Address Albany Place Car Park	Parish Dover Town Council	Overall SHLAA Score 34 (6-10 Years)	Area 0.40 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>This car park has spectacular views of Dover Castle, and lies in close proximity to the town centre. The site is situated on rising ground, lying below the Western Heights. The site is bounded to the south, east and north by mainly terraced housing or apartments blocks. On the west side the site is bounded by the Cowgate Cemetery. The site is of an irregular shape, currently set out as a public car park with approximately 94 spaces and laid to tarmac. It is enclosed by a brick/stone wall to the west and mainly timber fencing to the other boundaries.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p>				
<p>The site is located within the urban boundary.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Regard needs to be had to the setting of the nearby cemetery. Consideration would need to be had for adjoining properties - particularly overlooking into and from. It would be necessary to safeguard the pedestrian route through site to Western Heights (and possibly retain a number of car parking spaces for visitors to Western Heights). In order to ascertain whether the site is contaminated the historic uses will need to be reviewed.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The area to the north and west, within the site, is a designated Conservation Area. A listed building is located to the east of the site.</p> <p>The site is within a very sensitive archaeological area, adjoined to the west by the Western Heights fortifications, Roman lighthouse and medieval chapel and a Scheduled Monument. Part of the Roman fort of the Classis Britannica lies partially within the site below Albany House to the north.</p> <p>Any development would need to respect the setting of the conservation area and adjacent listed buildings together with the topography and potential for archaeological remains in the area.</p>				
<p>Landscape Impact</p> <p>The site lies at the bottom of the main pedestrian access – the wide steps - to the Drop Redoubt and the Western Heights. Insensitive development, both in terms of elevations and roofscape, could blight the promotion of this entry to the Drop Redoubt. It's current contribution to the townscape is, however, negative.</p>				
<p>Biodiversity</p> <p>There is no biodiversity interest in the site itself, although the adjacent Cowgate Cemetery may provide bat roosting opportunities. If development included gardens, there could be a very minor increase in biodiversity.</p>				
<p>EIA Screening: Site sensitivity as well as dph would indicate screening is necessary</p>		<p>Appropriate Assessment: in-combination mitigation for Thanet Coast SPA required.</p>		
<p>Green Infrastructure</p>				

Although the site itself provides no GI, its current and future role as a car park for people using Western Heights needs to be considered. The need for car parking may increase to provide access to the GI and maintain a link between the town centre and the countryside that development may intrude upon. In purely GI terms, this site may be better disposed towards civic amenity (i.e. left as open space or a civic square), than housing.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site has an existing public access from York Street via Princes Street leading into Albany Place. Since this is currently an operational car park any redevelopment will create less vehicle movements.

Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school

The site is located within a five minute walk of Dover town centre, with a number of services and facilities on offer. A GP surgery is located on the High Street, and there are a number of bus stops offering a variety of destinations. St. Mary's Primary School is located within a ten minute walk of the site, as is Dover Priory Railway Station which provides services to Folkestone, Ashford, Canterbury and beyond to London.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

This site presents an opportunity to redevelop a current car park. A sufficient amount of car parking will need to be retained in order to enable pedestrian access to Western Heights. It is suggested that the smaller, and separate, car parking area should remain in its entirety for this. Redevelopment of the larger car park would need to have regard to the setting of the adjoining Conservation Area, the Scheduled Monument, Listed Buildings and archaeological remains. Coupled to this overlooking issues will need to be examined since neighbouring properties are in close proximity.

Consider for inclusion in the Submission Document?

Yes

Part of the site to be retained as a car park for Western Heights.

Site Code DOV25	Address Land at Durham Hill	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 28.5 (+15 Years)	Area 0.34 ha Indicative No. of units @ 30 dph = 10
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>The site is flat and bounded on two sides by retaining walls; however, the site sits much higher than the road level. To the south of the site lies Cowgate cemetery. To the east is a relatively new row of terraced properties fronting Durham Hill. To the west lies the western heights Scheduled Monument (SM), to the north are two storey flats owned by DDC.</p>				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park				
<p>The site is located within the urban boundary, and is designated as open space (covered by Core Strategy policy DM25) and is also within a Conservation Area.</p>				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
<p>The site lies at a higher level than the road, and rises to the west.</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment The site is within Western Heights Conservation Area and is adjacent to a Scheduled Monument (SM), which is west of the site. The development of the site would have a detrimental impact on the open character of this part of the Conservation Area and the setting of the SM.</p>				
<p>Landscape Impact The site is flat and bounded on two sides by retaining walls. It is likely to be a chalk cut platform. It is well located with respect to other buildings. If the site were developed this could lead to pressure on the Western Heights, a Scheduled Monument.</p>				
<p>Biodiversity The site abuts the Western Heights Local Nature Reserve and Local Wildlife Site. It is likely that the site is abandoned chalk grassland and there is potential for restoration. The site is likely to support reptiles and a good range of invertebrates. There are numerous anthills. Full ecological surveys would be needed.</p>				
EIA Screening: Proximity to sensitive sites indicates screening necessary		Appropriate Assessment: projected dph suggests that Thanet Coast SPA mitigation would be triggered.		
Green Infrastructure				

The site provides a step-change in levels between Cowgate Cemetery and Durham Hill. It is relatively isolated in biodiversity terms, but does need assessment. Its role otherwise in GI is currently negligible. Development might provide an opportunity for creating a link between Cowgate Cemetery and Durham Hill increasing the permeability to Western Heights, as well as an enhancing pedestrian linkage between the railway station and the Albany Place car park.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Due to the gradient of Durham Hill it would be difficult to find a satisfactory point of access which would provide adequate sight lines. The site is at a higher level than the road and, therefore, there would be difficulty in achieving a suitable access given the gradient.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

The site is located within a five minute walk of Dover town centre, with a number of services and facilities on offer. A GP surgery is located on the High Street, and there are a number of bus stops offering a variety of destinations. St. Mary's Primary School is located within a ten minute walk of the site, as is Dover Priory Railway Station which provides services to Folkestone, Ashford, Canterbury and beyond to London.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

There is a problem with access to the site due to change of gradient and poor sight lines. There would also be an adverse impact on the Conservation Area, the setting of the Scheduled Monument, and a potential loss of biodiversity. Furthermore, development of the site could lead to development pressure on the Western Heights. Consequently, the site is not suitable for development.

Consider for inclusion in the Submission Document?

No

Site Code NS11DOV	Address Western Heights	Parish Dover Town Council	Overall SHLAA Score Not scored in the SHLAA due to constraints	Area 49.10ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 1473

Current Use SHLAA Score:

Description of Site

The Western Heights is a landscape curiosity. A highly modified ridgeline overlooking Dover Town, its character has undergone constant change. Prior to the 19th century it was predominantly a grazed chalk downland. The 19th century saw it transformed into a massive half-sunken fortification with the Citadel to the west and the Drop Redoubt to the east with open 'fields of fire' between, above chasm-like connecting ditchwork. Since WW2 the fortress has fallen into decline, with its chalk grassland slopes subject to scrub invasion and woodland growth, predominantly of Sycamore, occurring wherever it can get a foothold. Abandonment has led to demolition of parts, vandalism and a general aura of neglect, except for the area around the Citadel which is owned by the Home Office and has been used variously for secure holding of people. This use has been accompanied by the presence of highly intrusive fencing.

The site is located in a prominent position, overlooking the western docks. To the north lies existing residential development, the town centre lies to the east, and the A20 (the main thoroughfare to the docks) to the south. Open countryside, submitted as NS10DOV, lies to the west. In all instances, due to the topography the site of Western Heights is raised above adjacent land.

Policy Alignment SHLAA Score:

The site is located outside, but immediately adjacent to, the urban boundary. The majority of the site is designed as a Scheduled Monument and is located within a Conservation Area (its extent is slightly greater than that of the Scheduled Monument). In addition, a number of parcels on the site are covered by Policy DM25, that is protected Open Space.

Physical Constraints SHLAA Score:

Historic Environment

Almost all of the Western Heights is a Scheduled Monument ('Fortifications, Roman lighthouse and medieval chapel on Western Heights') and a Conservation Area (the 'Western Heights Conservation Area'), and contains two Listed Buildings – the Citadel's Officers' Quarters (listed as the 'Administration Block, Dover Young Offenders' Institution', Grade II), and the 'Grand Shaft stairs and attached railings' (Grade II)

Landscape Impact

Reflecting its chequered history, the current condition of the Western Heights is poor, while it has high sensitivity, indicating that any landscape interventions should restore the previous landscape, and for heritage reasons this should be the landscape associated with its military use. Development that would compromise restoration should be resisted.

Biodiversity

There is considerable biodiversity interest on the Western Heights, including chalk grassland, together

with its associated invertebrates and reptiles, and the presence of bat roosts.

Various parts of the site lies within LWS DO32 Dover Western Heights, including the land to the north-east of the Drop redoubt, the Detached Bastion and land to the south east of the Officer's Quarters. In addition the western end of the site lies within LWS DO12 Great Farthingloe Downs. These areas are listed for chalk grassland, a priority habitat.

The fortifications are known to provide winter roosts for a number of bat species and there may also be summer roosts.

Any development proposals should avoid protected areas as well as maintain and enhance biodiversity.

EIA Screening: Essential due to site sensitivity

Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary, together with screening in respect of in-combination Air quality impacts on Folkestone to Etchinghill Escarpment SAC and Dover to Kingsdown Cliffs SAC.

Green Infrastructure

Some parts of the site are within the core area of Green Infrastructure and are protected under CS Policy CP7, including open spaces within the fortress. Furthermore, certain north-eastern parts of the site are Local Nature Reserve and Open Access Land (CRoW Act 2000). The site is frequently used for recreation such as dog walking, but also for anti-social behaviour.

Any development should respect the existing GI and maintain its integrity. If GI is proposed to be lost to housing, full compensation would be necessary which ensured the maintenance of the integrity of the local GI.

Proximity to Road Network SHLAA Score:

Access to the site is from Western Heights Roundabout, via South Military Road or from the east via Durham Hill and North Military Road.

Access to Services SHLAA Score:

The nearest Primary School is located at Aycliff, although this would be more than a ten minute walk from the site. All other services and facilities are located within Dover town and would be within a ten minute walk from the eastern portion of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

There are a number of conservation issues which need to be taken into account in any development proposal. Unless sensitively undertaken any development would have a detrimental impact on the Scheduled Monument, Conservation Area and biodiversity interests. Without the presentation of additional evidence it remains unclear whether any development proposal would manage to conserve and enhance this unique site.

Consider for inclusion in the Submission Document?

No

Site Code NS01DOV	Address Redundant Transport Depot, South Military Road, Western Heights, Dover	Parish Dover	Overall SHLAA Score 22.0 - Undeliverable	Area 0.65
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 20

Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc
Description of Site

The site is located to the south west of Dover, with access from South Military Road. South Military Road is sufficiently wide for two cars to pass, and provides access to Western Heights. The topography of the land is such that the gradient of the road is steep in places. A chalk scar lies to the north west, which is outside of the site boundary and is within a Local Nature Reserve.

A number of buildings, which appear to be in a fairly good condition, are located on the site which are surrounded by hard standing. The building nearest to the entrance is of brick and tile construction, possibly former office space, whilst the others are storage buildings/ warehouses. The site is currently vacant having previously been used as a transport depot for a freight services company.

Policy Alignment SHLAA Score: 1.0 - Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation

The site is located outside of the urban boundary, but is within a Conservation Area and Scheduled Monument. The buildings are excluded from the Scheduled Monument.

[saved LP policy DD23 – Chalk Scar]

Physical Constraints SHLAA Score: 1.0 - Sites close to cliff or coastal areas liable to erode

Whilst the SHLAA scored 1.0 the site is located a reasonable distance inland. However, the site is surrounded by the Western Heights Local Nature Reserve, designated in 1994, with the purpose to maintain and enhance their special wildlife and geology.

Flood Risk

The site is located within Flood Zone 1 which would be appropriate for residential development.

Historic Environment

Development of this site could have an impact on the setting of the Scheduled Monument and its setting, given its proximity. This would need to be investigated further.

Landscape Impact

The site is where the earlier South Front Barracks (1860's) were situated in a deep chalk cutting. This situation created an extremely limited visual impact and that remains today. The buildings existing on the site today are associated with haulage and are only partially visible from South Military Road. There would be some visual link to Dover Harbour except for the presence of self-sown Sycamore woodland to the east. Development of the site would have limited landscape impact, although care would be needed in respect of building height relative to the lip of the cutting with the North Downs Way running near the boundary to the northwest.

Biodiversity

The site is occupied by modern buildings, which are only likely to have a low bat interest, although the Western Heights is important in respect of these species. The chalk cliffs will hold some chalk flora

interest, but this will be somewhat limited.	
EIA Screening would be necessary under urban infrastructure (S2.10)	Appropriate Assessment: there would be a need to contribute to the Thanet Coast SPA mitigation strategy.
<p>Green Infrastructure</p> <p>The site is almost entirely self-contained. The North Downs Ways (and prospective National Coastal Access Path) runs near to the NW boundary, but a considerable height above the site. A remnant of the South Lines ditch work runs from the western edge of the site down towards South Military Road, but this has not been investigated; there may be limited off-site historic restoration and access provision opportunities here. There is no substantial biodiversity connectivity to the wider area.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>Access to the site from the A20, is via South Military Road. This is steep and there are no footways from the site in either direction. There are concerns that the site lines would not be sufficient if the existing access needed to be utilised. Sight lines are limited to the north and the road lacks street lighting little opportunity to provided footway for pedestrian access therefore unsuitable for residential development.</p>	
<p>Access to Services SHLAA Score: 2.5 Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>This is an isolated site located on the edge of the built-up area of Dover, with the nearest services being located in Aycliffe. However, the Primary School at Aycliffe would not be within a ten minute walk from the site. A bus stop is located within a five minute walk, and this provides connections to Dover Town Centre.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 - Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>Although geographically the site is located almost adjacent to the urban boundary, it is not suitable for residential development on sustainability grounds. There are no footways to the site, it is some distance from nearby services, and due to the steep gradients surrounding the site it could be difficult to encourage walking and cycling to Dover town centre.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS04DOV	Address Land at St. Patrick's Road, Aycliff	Parish Dover	Overall SHLAA Score Excluded from SHLAA as too small	Area 0.14 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 4
Current Use SHLAA Score:				
Description of Site				
<p>The site is located within Aycliff, an outlying built up area of Dover. The site is bounded by St. Patrick's Road to the east, St. David's Avenue to the north and the Old Folkestone Road to the south. A footpath encloses the site to the west, and beyond this are three terraces of properties. The site comprises a narrow rectangular strip of land, which is designated as Open Space, which provides vital green space within the built up area. The site is well maintained, with a number of trees and bushes located in three circular areas.</p>				
Policy Alignment SHLAA Score:				
<p>The site is located within the urban boundary, and is designated as Open Space in Policy DM25 of the adopted Core Strategy.</p>				
Physical Constraints SHLAA Score:				
<p>There are no obvious physical constraints; however the site slopes to the south. Telephone wires run from one central pole across the site to a number of houses to the west of the site.</p>				
Flood Risk				
<p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
Historic Environment				
<p>No considerations</p>				
Landscape Impact				
<p>Aycliff is a housing estate dating from the late 1950's built on chalk. As such, it is considerably lacking in structural vegetation, and is reliant of wide verges and open spaces to frame its setting. Whilst the loss of this green space would not have a wider impact it would erode the character of the settlement.</p>				
Biodiversity				
<p>There are no biodiversity concerns for developing this site.</p>				
EIA Screening: Too small for consideration			Appropriate Assessment: Too small for consideration	
Green Infrastructure				
<p>Open spaces make an important contribution to the District's network of green infrastructure, and any change must be considered within this overall context. This site provides a link between the verges on Old Folkestone Road and St David's Avenue, consolidating the ambience of the area.</p>				
Proximity to Road Network SHLAA Score:				

The site fronts St. Patrick's Road, where there is a footway on both sides. A suitable access could be achieved given that the site is located within a 30 mph speed restriction.

Access to Services SHLAA Score:

A number of bus stops are located in close proximity to the site and the Primary School is within a five minute walk. A convenience store is located less than five minutes away on St. Giles Road. Aycliffe Community Primary School together with an on-site Children's Centre is also within a five minute walk, located on St. David's Avenue.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

The site provides valuable open space (protected through Policy DM25) in an otherwise built up environment. If the site were to be developed the requirements of Policy DM25 would need to be satisfied. One being that the site "has no overriding visual amenity interest". Given the value of the site as providing valuable open space in an otherwise built up area, then it is expected that this would be difficult to overcome. Furthermore, any development of the site would be out of keeping with the existing development, especially in terms of design.

Consider for inclusion in the Submission Document?

No

Site Code NS10DOV	Address Farthingloe	Parish Dover Town Council	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 55.34 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 1660

Current Use SHLAA Score:

Description of Site

The site is located to the west of Dover town. It is bounded by Folkestone Road (B2011) to the north, open countryside to the south and west and existing residential properties, within the existing urban boundary, to the north east. There are a number of properties immediately to the north of the site, however these are outside of the site boundary. The site is predominately open countryside, although part of the site contains the former Channel Tunnel worker's site. This site has extant planning permission for three B1 units (DOV/06/0088).

The Thatched Barn at Great Farthingloe Farm operates as a business venture, providing a function room/venue which is licensed for weddings. Located to the east is Great Farthingloe Farmhouse, an early nineteenth century three storey yellow brick building is Grade 2 listed, framed by mature sycamore trees that are subject to a Tree Preservation Order.

Policy Alignment SHLAA Score:

The site is located outside of the urban boundary, but within the AONB. Any development of the site could have a detrimental impact on the AONB.

Physical Constraints SHLAA Score:

Historic Environment

Great Farthingloe Farmhouse and adjacent outbuildings, are Grade II listed. Any development must respect the setting of these heritage assets.

Landscape Impact

Farthingloe lies within the AONB. Part of the site has been compromised by the old Channel Tunnel workers site at Great Farthingloe Farm, which has since been granted permission for commercial use and has been implemented. The remainder of the site forms the north-west face of one of the hillsides that characterises the west of Dover. The landscape quality of such ridges has been partially compromised by development elsewhere, but those are predominantly outside the AONB. Currently, the condition of the local area is good and it affords fine views of Dover Castle. Owing to the topography, the sensitivity is moderate and this suggests landscape interventions should be based on principles of conserve and reinforce.

Development, although agreed in principle for the immediate area around Great Farthingloe Farm, would be detrimental to the AONB. Extending development to other parts of the site would exacerbate this and demonstrably conflict with PPS 7.

Biodiversity

The upper slopes of the site comprise chalk grassland neutral grassland, some of which has extensive scrub. These areas form part of LWS DO12 Great Farthingloe Downs. The lower slopes appear to be improved grassland, some of which has been regularly ploughed in the past. The hillside will be important for bats moving between Western Heights and the wider countryside. The site supports a good number of bird species, as well as common reptiles and grassland invertebrates. Development

proposals which either damage or risk damage to the biodiversity interest would not be acceptable.	
EIA Screening: Essential due to site sensitivity	Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary, together with screening in respect of in-combination Air quality impacts on Folkestone to Etchinghill Escarpment SAC and Dover to Kingsdown Cliffs SAC.
<p>Green Infrastructure</p> <p>The upper slopes of the site are Open Access Land (CRoW Act 2000), LWS and AONB and contribute to the major climate change/biodiversity corridor towards Shepway. As such it is protected by CS Policy CP7. Development should neither occur here nor compromise the GI functionality of the area.</p>	
<p>Proximity to Road Network SHLAA Score:</p> <p>There is a substantial existing access which serves the site from Folkestone Road, (B2011), which includes a right turn lane.</p>	
<p>Access to Services SHLAA Score:</p> <p>There is a bus stop adjacent to Farthingloe farm (in an easterly direction from the access to the Farthingloe site), which provides connections to Dover town centre and Folkestone. The nearest Primary School is St. Martins although this would be more than a ten minute walk. All other facilities are located some distance away, within Dover town.</p>	
<p>Market Attractiveness SHLAA Score:</p>	
<p>Ownership SHLAA Score:</p>	
<p>Analysis</p> <p>The site is located within the AONB where development is only permitted on the basis of a substantiated need. In addition, any development would need to have regard to the Grade 2 listed farmhouse (and adjoining outbuildings). In the absence of any evidence to justify an overriding need, development of the site should be resisted.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAD22	Address Land to the south of Folkestone Road and west of number 455	Parish Dover Town	Overall SHLAA Score Not scored as located within AONB	Area 0.43 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score:				
Description of Site <p>The site lies to the south of Folkestone Road, which is bounded by extensive tree and scrub cover. There is a small stretch of the frontage which is enclosed with a close boarded fence. There is an existing access to number 455 which also serves the neighbouring plot. Whilst, it appears that this access is within the site boundary on the ground it appears that the access is currently in use in connection with number 455. This property lies outside of the site boundary. Overall, the site is very overgrown, with trees, scrub and brambles. Beyond the site, to the south, is a playing field and pavilion, which are allocated as open space under Policy DM25 of the adopted Core Strategy.</p>				
Policy Alignment SHLAA Score:				
The site is located outside of the urban boundary and within the AONB.				
Physical Constraints SHLAA Score:				
Flood Risk <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> Historic Environment <p>No considerations</p> Landscape Impact <p>The site lies between housing at the edge of Dover and the Farthingloe site that has an extant permission for commercial development. It is primarily on a plateau at the bottom of a steep slope from the B2011. It is clearly visible from the AONB open access land at Western Heights. Development could be seen as an extension of the urban edge, but a density of 30dph would not be amenable with the urban fringe and would have a detrimental impact on the setting of the AONB.</p> Biodiversity <p>The site is overgrown, comprising scrub and trees. The edge of the site may provide foraging/flight lines for bats and a survey should be undertaken to ensure that if this is the case, the continuity of bat habitat is not lost.</p>				
EIA Screening: if greater than 0.5 ha, screening under S2.10 needed		Appropriate Assessment: if more than 15 houses are proposed, a contribution to mitigation for Thanet Coast SPA will be required as well as potential in-combination impacts will be necessary.		
Green Infrastructure				
The GI interest in this site is limited to having a role in the green link across the B2011 Valley for biodiversity.				

Proximity to Road Network SHLAA Score:	
<p>There is a 40mph speed limit on this section of Folkestone Road. There are footways on both sides of road. A cycle route runs alongside the footway on both sides of the road and continues to Dover Town Centre. It would be possible to achieve the desired visibility to allow an access onto the site. There is a steep downhill gradient onto the site and the maximum gradient for access would need to be achieved.</p>	
Access to Services SHLAA Score:	
<p>A bus stop is located less than five minutes from the site, along Folkestone Road in the direction of Dover Town. From here, services are available to both Dover and Folkestone town centres. Vale View Community School (a Primary School and Nursery) is approximately a ten minute walk from the site.</p>	
Market Attractiveness SHLAA Score:	
Ownership SHLAA Score:	
Analysis	
<p>Development at the density proposed (30dph) would have a detrimental impact on the landscape, particularly given that the site is located within the AONB. Currently the site offers visual separation between Dover and the adjoining countryside, and this should be preserved.</p>	
Consider for inclusion in the Submission Document?	No

Site Code DOV03M	Address Land north of Folkestone Road	Parish Dover Town	Overall SHLAA Score Not considered in the SHLAA as the site is located in the AONB	Area 1.33 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 40
Current Use SHLAA Score:				
Description of Site The site lies to the north of Folkestone Road, where there is a steep bank of approximately four metres between the road and the site. In addition, a bus stop and a number of parking bays are located immediately adjacent to the site on the Folkestone Road. The site is heavily screened from the road with hedgerows/trees and comprises overgrown, undeveloped land. To the south lie existing residential areas, to the east Dover Town Council owned allotments, and to the north and west open countryside.				
Policy Alignment SHLAA Score: The site is outside of the urban boundary, within the AONB and part of the site is allocated as open space (Policy DM25).				
Physical Constraints SHLAA Score: The western part of the site is within the AONB, while the remaining eastern part will provide setting. Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact The site is predominantly within the AONB and that part outside is part of the setting. Development here would constitute an extension of the urban form into a nationally treasured landscape. Furthermore, the site sits above the B2010 on a valley side and would be highly visible from Western Heights. Biodiversity Site is located at the bottom of Stepping Down, a complex area of chalk slopes, neutral grassland, scrub and woodland that is undergoing ecological succession due to lack of management. The eastern part of the site has high potential, according to K-LIS, for chalk grassland establishment. Currently, the site will support common reptiles, common bird species and may provide foraging for bats.				
EIA Screening: The site is of a size that screening under S2.10 is necessary.		Appropriate Assessment: The site is such that a contribution to the Thanet Coast mitigation strategy is necessary. It would also be necessary to consider in-combination traffic pollution impacts on the Folkestone to Etchinghill Escarpment SAC.		
Green Infrastructure				

The site is Open Access Countryside. The ecology of the site indicates that it could benefit GI by being brought into management. In recreational terms it is well-used by dog walkers, although this appears restricted to the lower slopes. There is no clear pathway connection to the ridgeline PROW EB4, however.

Proximity to Road Network SHLAA Score:

There is a 40mph speed limit on this section of Folkestone Road, dropping to 30mph just before the eastern edge of the site. An existing access is located to the south west of the site, to Folkestone Road, however this has become overgrown and is currently only suitable for pedestrian access. It would be possible to achieve the desired visibility to allow an access onto the site. There is a steep change in gradient on the site and the maximum gradient for access would need to be achieved.

Access to Services SHLAA Score:

A bus stop is located immediately adjacent to the site. From here, services are available to both Dover and Folkestone town centres. Vale View Community School (a Primary School and Nursery) is approximately a ten minute walk from the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Part of the site is located within the AONB. Any development of the site would have a detrimental impact on the landscape, particularly on the AONB and its setting. There is also biodiversity interest on the site. Since the site is Open Access Countryside, if it is effectively managed, this could benefit GI.

Consider for inclusion in the Submission Document?

No

Site Code NS09DOV	Address Land North of Malmains Road, Dover	Parish Dover Town Council <hr/> Hierarchy Secondary Regional Centre	Overall SHLAA Score 25 Undeliverable	Area 0.92 Ha <hr/> Indicative No. of units @ 30 dph = 28
Current Use SHLAA Score: 1 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site An irregular shaped piece of undeveloped land located at the south-eastern edge (Folkestone Road area) of Dover town. The site is very overgrown and slopes steeply in a north westerly direction. There are existing residential properties along the south eastern and north western boundaries. The residential to the south east consist of two Victorian terraced roads, Lascelles Road and Malmains Road, which run at right angles from the site down the hill towards Folkestone Road. There is a change in level (roughly one metre) where the site meets the end of each road. There is an informal pedestrian access onto the site at the eastern corner from Church Road. This access is also overgrown and is little more than worn track. There is undeveloped open land to the west of the site which is part of the AONB. There are, however, two small areas immediately abutting the sites boundary to the north west and to the south west which are excluded from the AONB. The site, therefore, only abuts the AONB in one small area, which is the western most corner.				
Policy Alignment SHLAA Score: 1 - Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation The site lies outside of the settlement boundary, and is close to the AONB.				
Physical Constraints SHLAA Score: 6 - Site with small areas of sloping land, woods or hedgerows to be addressed There is signage to advise that the site is classed as Open Access Land and is therefore protected through the Countryside and Rights of Way Act (2000). Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment To the south east, located on the crest of the opposite ridgeline, there is the Western Heights Scheduled Monument. It would be unlikely that development of this site would have a detrimental impact on this monument. Development of the town has been within the valleys with undeveloped land framing the built form on the crest of the hills. Development of this site would result in the loss of this green ridgeline in this particular location, which would be detrimental to the character of the town. Landscape Impact The site is located on the crest of a ridge in a highly visible location close to the AONB. Development in this location would have a detrimental impact on the setting of the AONB and the character of Dover. Biodiversity				

<p>The site is part of the Little Farthingloe Woods and Grassland Local Wildlife Site and comprises neutral grassland, scrub woodland and, possibly, minor elements of chalk grassland. It would support common reptiles.</p>	
<p>EIA Screening: It is of an area sufficient to require S2.10 screening</p>	<p>Appropriate Assessment: Any development would have to contribute to the Thanet Coast mitigation strategy.</p>
<p>Green Infrastructure</p> <p>The site is open access land and is crossed by a major ridgeline PROW, EB4. Additionally the site is clearly very well-used, being criss-crossed with footpaths (Google Earth, 2007, accessed, August 2011). As such it is a rich GI resource.</p>	
<p>Proximity to Road Network SHLAA Score: 5 - Less than 5 metres from road assuming direct access to site</p> <p>There is no current vehicular access to the site, and it is our understanding that this would require the acquisition of third party land.</p> <p>If land ownership is not an issue, access could be achieved from Lascelles Road, Malmaims Road or Church Road. All are within a 30mph speed limit and have good footway accessibility. Rights of way may be definitive or claimed along the houses abutting the site which may need consideration. Lascelles Road and Malmaims Road are narrow and would be likely to suffer from a significant increase in vehicle movements although access would bring the benefit of a turning head to these roads which they currently lack.</p>	
<p>Access to Services SHLAA Score: 4.5 - Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is located close to Vale View primary school and a frequent bus service to the town centre. Other facilities within five minutes walk are playing fields to the east and a take-away along Folkestone Road, close to Lascelles Road. There are a couple of local shops located further along Folkestone Road (towards the town), but these are over ten minutes walk away. Dover Priory Railway Station is located just over a kilometre away.</p>	
<p>Market Attractiveness SHLAA Score: 3 - Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>The site has scored reasonably well in the SHLAA criteria in relation to access to the site, access to services and physical constraints. With regard to access, KCC Highways has also confirmed that a road access should be achievable onto existing roads, despite the change in levels. They have raised concerns that the two roads are narrow and would suffer due to the increase in traffic but the development may mitigate this by providing turning heads, which the roads do not currently have.</p> <p>The site, however, has scored poorly on policy alignment, current use and Market Attractiveness. The policy alignment score reflects the fact that the site is currently outside of the urban boundary.</p> <p>The main concerns with this site are that it is protected as a Local Wildlife Site and GI under Policy CP7, it is designated open access land and there would detrimental impact on the AONB. The indicative very high level of usage of the site by local people would confirm the maintenance of the protection it is given. For these reasons it is concluded that development should not be permitted.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code DOV23	Address Land to the north of Elms Vale Road	Parish Dover Town	Overall SHLAA Score Not scored as located within AONB	Area 1.59ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score:				
Description of Site The site is laid out as two separate, roughly square, fields which are at present fallow. The land rises gently from the road up the side of the valley, although the top field does not extend to the top of the slope. The site is some distance from the urban boundary, although a single property lies to the south of the site. Open countryside surrounds the site, and consequently it is very exposed.				
Policy Alignment SHLAA Score:				
The site is outside of the urban boundary and within the AONB.				
Physical Constraints SHLAA Score:				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact The site is an exposed hillside between fields that are commonly under arable crop. Housing in such a location would appear incongruous in any landscape, but given that the valley is one of those characteristic of this part of the AONB, it is difficult to find any justification for considering this site for housing. Biodiversity The site has little current biodiversity interest and this would not be a constraint on development.				
EIA Screening: screening would be necessary under S2.10		Appropriate Assessment: The site is such that a contribution to the Thanet Coast mitigation strategy is necessary. It would also be necessary to consider in-combination traffic pollution impacts on the Folkestone to Etchinghill Escarpment SAC.		
Green Infrastructure				
The only current contribution the site makes to GI is through landscape, although this must not be underestimated in itself. There are no links to the ridgeline PROW EB5 on Whinless Down. The site is not Open Access Countryside and has only limited potential for biodiversity enhancement.				
Proximity to Road Network SHLAA Score:				
Access to the site is via Elms Vale Road which turns into a single track access just east of Harbour School and the speed limit increases from 30mph to national 60mph a few metres west of Harbour				

School. The footpath on Elms Vale Road ends east of Harbour School and would need to be extended to the site. There are sufficient sightlines to provide an access to the site from Elms Vale Road. However, the access road, being a single track, is not suitable for the proposed number of units.

Access to Services SHLAA Score:

A bus stop is located under ten minutes from the site, on Elms Vale Road. Harbour School is also less than a five minute walk, located to the East of the site. However this is a special school for pupils aged 4 to 16. A primary school is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

The site is an exposed hillside, located some distance from the edge of the urban boundary, and within the AONB. For the scale of units proposed a satisfactory access arrangement could not be achieved. There is no justification for considering this site for residential development.

Consider for inclusion in the Submission Document?

No

Site Code SHL080	Address Land to the south side opposite Recreation Ground, Elms Vale Road	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 31 (11-15 Years)	Area 0.52 ha Indicative No. of units @ 30 dph = 16
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Convex shaped strip of land located on the edge of a 'leafy' residential area on the western side of Dover. The land rises steeply from a retaining wall on the northern boundary (Elms Vale Road) and the site consists of dense Ash and sycamore woodland. To the east and south of the site there are residential properties. Playing fields lie to the north and there is scrubland to the west of the site.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is adjacent to the urban boundary and the AONB.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed Steep slopes. Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact The site abuts the AONB and its wooded appearance currently provides an attractive green space on the edge of an urban area. Development would introduce a harsh urban edge, which would have a detrimental impact on the adjacent AONB. Biodiversity Development is unlikely to have an adverse impact on designated sites (there is, however, a Local Nature Reserve (LNR) to the north (beyond the playing fields) and an Ancient Woodland to the south west). A survey would be required as part of any application as there could be an impact on the habitat of bats and badgers.				
EIA Screening: necessary due to S2.10 and proximity of the AONB		Appropriate Assessment: in-combination mitigation for Thanet Coast SPA required.		
Green Infrastructure The major GI is to be found opposite at Elms Vale Recreation Ground and Whinless Down. This site does not contribute to either biodiversity or recreational aspects of GI, but provides an important landscape break between urban Dover and the AONB.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

Although sight lines would be achievable from Elms Vale Road, access would not be achievable due to the gradient of the site and the retaining wall. Access from Markland Road (to the south) would not be acceptable.

There are walking and cycle connections and the wider road network would be able to accommodate additional traffic from any development.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

A bus stop is located under five minutes from the site, on Elms Vale Road. Harbour School is also less than a five minute walk, located opposite the site (a special school for pupils aged 4 to 16). A primary school is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Development of this site would result in a harsh urban edge, which would have a detrimental impact on the setting of the AONB. The site currently acts as a landscape break, between urban Dover and the AONB, which should be retained. The topography of the site is also very steep and it is unlikely that a suitable access could be achieved due to this.

Consider for inclusion in the Submission Document?

No

Site Code NS07DOV	Address Land at Noah's Ark Road, Dover	Parish Dover	Overall SHLAA Score 27.5 - Undeliverable	Area 0.30 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 9
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site is raised approximately two metres from the road. It is located to the north of Noah's Ark Road and to the west of recently constructed properties on the former Eye Hospital site. There are extensive views from the site over the built up area of Dover, to the west the land remains open and undeveloped. The site is located within a Local Nature Reserve.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation				
The site is located outside, but adjacent to the urban boundary and within a Local Nature Reserve.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site lies on a ridgeline and is very prominent with clear views to Western Heights and Dover Castle as well as Dover town. The green ridgelines to the west of the town comprise one of Dover's enduring and important characteristics. Development here would remove a valuable landscape resource from the public domain.				
Biodiversity The site is designated as part of High Meadow Local Nature Reserve. The site is partly fenced along the ridge with new planting to the roadside. The land is currently horse-grazed and appears to be enriched with just occasional indicators of chalk grassland. The fencing and planting will reduce some of the grassland interest and the site is suffering from severe footpath erosion due to its high level of use.				
EIA Screening: Too small to consider			Appropriate Assessment: Too small to consider	
Green Infrastructure To the rear of the proposed site is a very well used informal pathway which links to the ridgeline PROW EB5 and the whole hillside is criss-crossed with informal paths indicating a very high use by local people for walking from one valley to the next and for general recreation. The site is protected under policy CP7.				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
Access to the site would be achievable, although a public lamp column may need to be relocated. The site is within a 30mph speed restricted area and there could be issues in connection with the gradient.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is in very close proximity to the Dover Grammar School for Boys and Astor College for the Arts and Priory Fields Primary School. There are a number of bus stops located nearby. The nearest bus stops are a reasonable walk – either further down Noah’s Ark Road or on Northbourne Road. There is a small convenience store located on the junction of Astor Aveune/South Road and a number of public houses within the Tower Hamlets area.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
Given that the site lies within the Local Nature Reserve and is located in a very prominent position any development of the site would have a detrimental landscape impact. The site functions well within the context of policy protected Green Infrastructure and should be retained as such.	
Consider for inclusion in the Submission Document?	No

Site Code NS12DOV	Address Land to the North of Edred Road, Dover	Parish Dover Town Council	Overall SHLAA Score Not considered due to size	Area 0.10 Ha Indicative No. of units @ 30 dph = 3
Current Use SHLAA Score: N/A				
<p>Description of Site</p> <p>Triangular shaped, undeveloped site, located within countryside. The site is located on a steep area of land, forming part of the valley sides and rising towards the ridge. The nearest development is located along Edred Road to the south, but these properties are separated by an area of scrub on a steep bank.</p> <p>The access appears to be via a footpath/public right of way, which is itself accessed from land associated with High Meadow flats (parking area).</p>				
Policy Alignment SHLAA Score: N/A				
The site is located outside of the urban boundary and is designated as a Local Nature Reserve.				
Physical Constraints SHLAA Score: N/A				
The site is located on a steep area of land.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No direct impact on designated sites as the nearest Listed Buildings and Conservation Area are approximately 0.2 km in London Road to the north east.				
Landscape Impact				
The site is located at the top of a hill in a prominent position. Development in this location would, therefore, be highly visible and would have a detrimental impact on the wider landscape. Development would also have a detrimental impact on the setting of the town as it would encroach into the countryside which frames the town and provides part of its character.				
Biodiversity				
The site has been identified as High Meadow Local Nature Reserve and considered to high potential for chalk grassland restoration (K-LIS) which is supported by Google Earth imagery (2007, accessed, August 2011) that indicates chalk exposure where scrub has been removed.				
EIA Screening Too small to consider		Appropriate Assessment: Too small to consider		
Green Infrastructure				
The site is part of High Meadow Local Nature Reserve which is under active management by White Cliffs Countryside Partnership. It constitutes one of the important green ridgeline 'fingers' that are so characteristic of the western side of Dover. Development would require de-designation of the Local Nature Reserve designation and would be contrary to Policy CP7.				
Proximity to Road Network SHLAA Score: N/A				
The site has no direct road access and, if it were to use the public path, would require third party land as it would have to cross the parking/access area to High Meadow flats. Development would, therefore, would not be possible as there is no direct vehicular access to the site.				

Access to Services SHLAA Score: N/A	
The site is located within 5 to 10 minutes of a bus route (63) which goes to the town centre. The site is also located close to Priory Fields School, but this would take longer than ten minutes to walk.	
Market Attractiveness SHLAA Score: N/A	
Ownership SHLAA Score: N/A	
Analysis	
The site is not suitable for development given that there is no direct vehicular access to the site. Coupled to this the site is in a very prominent position in the wider landscape and any development would have a detrimental impact on this. The site is also designated as a Local Nature Reserve.	
Consider for inclusion in the Submission Document?	No

Site Code NS16DOV	Address TA centre, London Road, Dover	Parish Dover Town Council	Overall SHLAA Score 37 0-5 years	Area 0.33 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 10
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
Description of Site				
<p>Rectangular shaped site located in the central urban area of Dover town. The site is located where there is a junction between two parallel roads, Beaconsfield Road (effectively a narrow service road) and London Road (the A256). The site consists of three buildings; one large 'L' shaped building fronting Beaconsfield/London Road, which is of a modern appearance (1980s?) and two smaller outbuildings located to the side and rear of the site. The central part of the site appears to be hard standing. The site has mature trees located in the southern corner and also along the south western and south eastern boundaries. There is a wall to the rear of the site (south western boundary) along George Street. There appears to be a considerable change in levels between this road (higher) and the site (lower).</p> <p>The vehicular entrance to the site lies between the main building and side building and is access from the junction described above. London Road is on Dover's one-way system which requires vehicles to turn left when exiting the site.</p> <p>The surrounding area is mainly residential with terraced properties to both the east and west, some of which are Grade II listed. To the rear, adjacent to the site on George Street, are 1960's Dover District Council owned flats.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is located within the urban boundary, immediately adjacent to a Conservation Area.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
The site itself is flat but there is a high bank to the rear due to the change in levels at that point.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
When viewed from London Road, the terraces of properties to both the north west and south east are listed. To the south west, where the site fronts George Street the site is enclosed by a historic wall, which is considered a Heritage Asset. Any development of the site must not only bear in mind the constraints of the adjoining listed buildings, the conservation area and the historic wall, but should also front London Road.				
Landscape Impact				
The site is located at the bottom of a valley in an urban area. There would be no detrimental impact on the wider landscape, but it would be important to maintain some degree of screening of the properties on George Street to avoid compromising both the Dover Road street scene and the outlook from properties on George Street.				
Biodiversity				
The majority of trees on the site are Sycamores. Biodiversity interest is likely to be limited to species that can utilise Sycamore.				

EIA Screening: Too small to be of concern	Appropriate Assessment: Too small to be of concern
<p>Green Infrastructure</p> <p>The GI of the site is limited to the tree coverage to the rear and this has relevance in landscape protection.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site abuts London Road at the front of the site and George Street, to the rear. The existing access point off London Road is acceptable (fronts one way section of residential access road with corner protection traffic regulation orders).</p> <p>There are no traffic regulation orders on George Street to the rear. Possible access point off George Street but high flanking wall is likely to be protected and will restrict sight lines. George Street is at a higher level than the site, this could make a frontage development difficult unless the land is built up, however the front of the site (London Road) is at road level. The site may then need to be split if frontage development is desired or a graded road will be required to allow access from George Street.</p> <p>Site is within reasonable walking distance of town centre amenities and good bus routes. No traffic regulation orders on any of the approaches.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>Barton Junior School and the Peter Street/High Street surgeries are located within 5 minutes walk away. There are also a variety services, including shops (including a superstore), a community hall, takeaways and bus stops are located on London Road.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>The site is located within the Urban boundary and is located close to local services including a Doctor's Surgery and local schools. The vehicle access would also be suitable for the size of development envisaged. Any development would have to respect the close proximity to the Conservation Area. There would need to be retention of at least some of the trees which would limit development o the site.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>Yes</p>

Site Code LDF031	Address Land enclosed by Coombe Valley Road, Elgar Road and Prospect Place	Parish Hierarchy Secondary Regional Centre	Overall SHLAA Score = 37	Area 0.9 ha Indicative No. of units @ 30 dph = 27 Indicative No. of units @ 40 dph = 36
Current Use SHLAA Score: 5.0 – Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>LDF031 is bounded by a terrace of residential properties to the east and south, the gas holder to the west and Coombe Valley Road to the north. To the north side of Coombe Valley Road is a Jewsons yard. The site is currently vacant and on the market, to let, for open storage. It is cleared of buildings and mainly laid to concrete enclosed with steel palisade fencing. The site is largely overgrown with buddleia and brambles.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site lies within the urban boundary. The site was last in use as an employment site (open storage) and prior to the adoption of the Land Allocations Document any planning application (for a non-employment use) would be required to comply with Policy DM2.</p>				
<p>Physical Constraints SHLAA Score: 3.0 – Within or partially within Flood Zone 2 or with pylons and utilities or contamination issues</p> <p>The Health and Safety Executive has recommended specific maximum densities for residential development dependent upon the distance from the gas holder site. Approximately half of the site is located within the Inner Zone, and the remainder within the Middle Zone. Within the Inner Zone the HSE would advise against development at more than 40 dph, but ideally would consider 30 dph to be more suitable in this location. Within the Middle Zone the HSE will not advise against development in this location.</p> <p>An investigation of possible levels of contamination would need to be undertaken prior to any development to assess the nature, extent and cost of remediation should any contamination be present.</p> <p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>No considerations.</p> <p>Landscape Impact</p> <p>The site is within the built up area of Dover. It is bounded to the east and south by Victorian terraces, Edgar Road and Prospect Place and Coombe Valley Road to the north. The site appears to have been part of the gas works, with a gas holder present to the west. The site is level with Prospect Place above it and Edgar Road rising above it, southwards. There is scrub vegetation dotted across the site including trees to the bank up to Prospect Place. The site is derelict brownfield and in poor condition. It has low sensitivity, being set down in a levelled hillside. Development would provide opportunities to improve condition, although consideration needs to be given to neighbouring properties.</p> <p>Biodiversity</p>				

The site may support common reptiles in its margins and there is a possibility of bats roosting in neighbouring properties, although the site itself would be poor foraging. There would be no biodiversity constraints to redevelopment.

EIA Screening: would be necessary due to size

Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required and dependent on the number of other sites coming forward in Coombe Valley, specific screening may also be required.

Green Infrastructure

The Coombe Valley suffers from varying degrees of dereliction, somewhat exacerbated by the intermixing of housing and commercial sites. Redevelopment offers a real opportunity for provision of significant green infrastructure improvements. Alone, or in combination with other sites, some introduction of green infrastructure would be beneficial.

Proximity to Road Network SHLAA Score: Less than 5 metres from road assuming direct access to site

The site has frontage to Coombe Valley Road, with an existing access to the site. Coombe Valley Road has restricted access from London Road via a traffic light controlled single track road beneath the narrow railway bridge, immediately to the east of the site.

Comments relate to the whole Coombe Valley Area

There are likely to be issues with the signalised bridge on Coombe Valley Road for an additional 500 dwellings over that already approved but not built. A transport assessment would be required collating these sites as it is difficult to look at each in isolation and judge the cumulative effect on the bridge.

Alternative routes into and out of this area are not likely to be that attractive either due to their widths or traffic orders. Eric Road and Oswald Road are traffic calmed, St Radigunds Road is one way from London Road to Magdala Road and Bunkers Hill is one way towards London Road. Abbey Road which connects Coombe Valley with the rural area of River could be used but this is single track for much of its length.

There is a bus route around Coombe Valley and the London Road stops connect into the wider bus route system.

It is difficult to state at what time the railway bridge pinch point would reach a limit as other factors would need to be taken into account. The inclusion of robust travel plans would be one element and the adjustment of the signal timings could also have an effect.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

The Triangles Community Centre is located beyond Buckland Hospital to the west. There are a number of bus stops in close proximity. The bus services provide connections to the Town Centre. A primary school is located within a ten minute walk of the site. The hospital currently provides a number of medical services, however the nearest GP Surgery is located in the town. There are a number of local shops in Coombe Valley, including a takeaway.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 3.0 – Multiple use up to 1 hectare

Analysis

The Stage 1 Report detailing initial findings of the Coombe Valley Regeneration Initiative identified a number of opportunities and areas for change. In order to deliver some of the recommendations a number of sites should be allocated for residential development on the basis that significant improvements can be made to the entrance of the Coombe Valley area. There is an opportunity to create a new gateway (together with SAD19C and SAD19D), strengthening sense of place rather than replicating the built form of the past. Further investigation needs to be carried out regarding possible contamination.

Consider for inclusion in the Submission Document?

Yes

- Creation of a new gateway to Coombe Valley
- Opportunity for contemporary urban design

Site Code	Address	Parish	Overall SHLAA Score =	Area
SAD19D	Land enclosed by Coombe Valley Road and St Radigunds Road	Hierarchy Secondary Regional Centre	33.5	1.8 ha Indicative No. of units @ 30 dph = 54 Indicative No. of units @ 40 dph = 72
Current Use Initial SHLAA Score: 3.0 – Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>The site is located on the north side of Coombe Valley Road, immediately west of the railway embankment. SAD19D is currently in use for commercial purposes and comprises storage area associated with Coombe Valley Transport, predominately for larger HGVs and Jewsons builder's yard (a large purpose build warehouse and adjoining yard). To the east of the site lies the railway line, to the south of the site and beyond Coombe Valley Road, lies land submitted under reference LDF031, together with the gas holder. To the west and north, beyond Primrose Place and St. Radigund's Road respectively, lie existing residential properties. The northern boundary is marked by a substantial brick retaining wall below St. Radigund's Road. Within the site, fronting Primrose Road, is an electricity substation and water board compound.</p>				
<p>Policy Alignment Initial SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p>				
<p>The site lies within the urban boundary. The site is currently in use as an employment site and prior to the adoption of the Land Allocations Document any planning application for a non-employment use would be required to comply with Policy DM2.</p>				
<p>Physical Constraints Initial SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>The Health and Safety Executive (HSE) has recommended specific maximum densities for residential development dependent upon the distance from the gas holder site. The south western tip of this site is within the Inner Zone. The HSE would advise against development at more than 40 dph, but ideally would consider 30dph to be more suitable in this location.</p>				
<p>It is understood that the eastern portion of the site may have formed part of the adjacent gas works site, and therefore could be contaminated.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations.</p>				
<p>Landscape Impact</p> <p>The site is level, set below St Radigund's Road to the north and slightly above Coombe valley road to the south. It is bounded by the railway embankment to the east. Historically, the bulk of the site was the original gasworks site. It comprises a retail building merchant warehouse and transport company. Some landscaping to Coombe Valley Road is present which softens the street frontage, but overall the site is in poor condition. It is of low sensitivity. Redevelopment of the site would be beneficial to the townscape and landscape.</p>				
<p>Biodiversity</p> <p>The only wildlife likely to use the site would be bats foraging along the railway embankment. There would be no biodiversity constraint to redevelopment.</p>				

EIA Screening: would be necessary due to size	Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required and dependent on the number of other sites coming forward in Coombe Valley, specific screening may also be required.
<p>Green Infrastructure</p> <p>The Coombe Valley suffers from varying degrees of dereliction, somewhat exacerbated by the intermixing of housing and commercial sites. Redevelopment offers a real opportunity for provision of significant green infrastructure improvements. Alone, or in combination with other sites, some introduction of green infrastructure would be beneficial.</p>	
<p>Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Site has extensive road frontage on three sides.</p> <p>Comments relate to the whole Coombe Valley Area</p> <p>There are likely to be issues with the signalised bridge on Coombe Valley Road for an additional 500 dwellings over that already approved but not built. A transport assessment would be required collating these sites as it is difficult to look at each in isolation and judge the cumulative effect on the bridge.</p> <p>Alternative routes into and out of this area are not likely to be that attractive either due to their widths or traffic orders. Eric Road and Oswald Road are traffic calmed, St Radigunds Road is one way from London Road to Magdala Road and Bunkers Hill is one way towards London Road. Abbey Road which connects Coombe Valley with the rural area of River could be used but this is single track for much of its length.</p> <p>There is a bus route around Coombe Valley and the London Road stops connect into the wider bus route system.</p> <p>It is difficult to state at what time the railway bridge pinch point would reach a limit as other factors would need to be taken into account. The inclusion of robust travel plans would be one element and the adjustment of the signal timings could also have an effect.</p>	
<p>Access to Services Initial SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school</p> <p>The Triangles Community Centre is located beyond Buckland Hospital to the west. There are a number of bus stops in close proximity. The bus services provide connections to the Town Centre. A primary school is located within a ten minute walk of the site. The hospital currently provides a number of medical services, however the nearest GP Surgery is located in the town. There are a number of local shops in Coombe Valley, including a takeaway.</p>	
<p>Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership Initial SHLAA Score: 2-3 Ownerships</p>	
<p>Analysis</p> <p>Existing businesses may require assistance in relocation to alternative premises. (awaiting confirmation from Jewsons regarding relocation). It is understood that Coombe Valley Transport are looking to relocate. There would need to be an investigation into noise/ vibration issues given that the railway embankment is located immediately to the east. It is likely that the substation and water board compound would need to be retained.</p>	

The Stage 1 Report detailing initial findings of the Coombe Valley Regeneration Initiative identified a number of opportunities and areas for change. In order to deliver some of the recommendations a number of sites detailed should be allocated for residential development on the basis that significant improvements can be made to the entrance of the Coombe Valley area. There is an opportunity to create a new gateway (together with SAD19C and LDF031), making the place rather than replicating the built form of the past.

Consider for inclusion in the Submission Document?

Yes

- Creation of a new gateway to Coombe Valley
- Opportunity for contemporary urban design

Site Code	Address	Parish	Overall SHLAA Score =	Area
SAD19C	Land enclosed by Coombe valley Road and Primrose Road	Hierarchy Secondary Regional Centre	31.5	0.37 Indicative No. of units @ 30 dph = 11 Indicative No. of units @ 40 dph = 15
Current Use Initial SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site SAD19C comprises a small row of terraced properties (seven in total), a detached property, and a number of existing business uses (gym, joinery, sign-makers and part of Coombe Valley Transport). SAD19B and PP007 lie opposite the site to the south, immediately to the east are recently constructed flats, to the north lies part of SAD19D and existing residential properties are located to the west.				
Policy Alignment Initial SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation The site lies within the urban boundary.				
Physical Constraints Initial SHLAA Score: 8.0 – No obvious physical constraints The Health and Safety Executive (HSE) has recommended specific maximum densities for residential development dependent upon the distance from the gas holder site. The site lies within the Middle Zone, meaning that the HSE will not advise against development in this location. Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations. Landscape Impact The site is entirely within the built up area of Dover, slightly above Coombe Valley Road. There is a Victorian terrace and a detached house which contribute to character and continuity with the past. Overall sensitive redevelopment may contribute to townscape improvements. Biodiversity There may be a minor biodiversity interest associated with the housing: a bat survey should be undertaken to ensure no roosts are present. Aside from this, there is no biodiversity constraint to redevelopment.				
EIA Screening: would be necessary due to size		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required and dependent on the number of other sites coming forward in Coombe Valley, specific screening may also be required.		
Green Infrastructure The Coombe Valley suffers from varying degrees of dereliction, somewhat exacerbated by the intermixing of housing and commercial sites. Redevelopment here offers a real opportunity for provision of significant green infrastructure improvements, particularly if the opportunity is taken to create a green link between Coombe Valley Road and Primrose Road.				

Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site has extensive road frontage.

Comments relate to the whole Coombe Valley Area

There are likely to be issues with the signalised bridge on Coombe Valley Road if you are looking at an additional 500 dwellings over that already approved but not built. A transport assessment would be required collating these sites as it is difficult to look at each in isolation and judge the cumulative effect on the bridge.

Alternative routes into and out of this area are not likely to be that attractive either due to their widths or traffic orders. Eric Road and Oswald Road are traffic calmed, St Radigunds Road is one way from London Road to Magdala Road and Bunkers Hill is one way towards London Road. Abbey Road which connects Coombe Valley with the rural area of River could be used but this is single track for much of its length.

There is a bus route around Coombe Valley and the London Road stops connect into the wider bus route system.

It is difficult to state at what time the railway bridge pinch point would reach a limit as other factors would need to be taken into account. The inclusion of robust travel plans would be one element and the adjustment of the signal timings could also have an effect.

Access to Services Initial SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school

The Triangles Community Centre is located beyond Buckland Hospital to the west. There are a number of bus stops in close proximity. The bus services provide connections to the Town Centre. A primary school is located within a ten minute walk of the site. The hospital currently provides a number of medical services, however the nearest GP Surgery is located in the town. There are a number of local shops in Coombe Valley, including a takeaway.

Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership Initial SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

The site is in multiple ownership and in view of the number of existing uses on the site a comprehensive scheme would be desirable. Existing businesses may require assistance in relocation to alternative premises. It would be necessary to ensure that retained buildings do not detract from new development.

The Stage 1 Report detailing initial findings of the Coombe Valley Regeneration Initiative identified a number of opportunities and areas for change. In order to deliver some of the recommendations a number of sites should be allocated for residential development on the basis that significant improvements can be made to the entrance of the Coombe Valley area. There is an opportunity to create a new gateway (together with SAD19D and LDF031), making the place rather than replicating the built form of the past.

Consider for inclusion in the Submission Document?

Yes

Creation of a new gateway to Coombe Valley
Opportunity for contemporary urban design

Site Code SAD19A	Address Buckland Hospital	Parish	Overall SHLAA Score = 35	Area 2.5 ha
		Hierarchy Secondary Regional Centre		
				Indicative No. of units @ 30 dph = 75 Indicative No. of units @ 40 dph = 100
Current Use Initial SHLAA Score: 4.0 – Partially occupied single use site				
<p>Description of Site</p> <p>SAD19A comprises the Buckland Hospital site, which includes operational hospital buildings, those which have been considered redundant together with a staff car parking area to the east of the buildings. Development of the site has evolved over many years and comprises an extensive range of mainly single and two storey buildings. The site is mainly level, although rising to the south, and some of the existing buildings are constructed in elevated terraces overlooking the site. Existing residential properties border the site to the north, east and west. Beyond the site to the south is a green treed area, forming part of the side to the valley.</p>				
<p>Policy Alignment Initial SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation The site lies within the urban boundary.</p>				
Physical Constraints Initial SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are a number of existing buildings onsite, a survey would need to be undertaken to establish whether any are worthy of retention, in terms of their historic importance. Once this is ascertained, those worthy of retention should be converted in preference to demolition and rebuild.</p>				
<p>Landscape Impact The site is complex, sitting part within the valley bottom, but extending part-way up the northern slope of an extension of Whinless Down which leads to High Meadow Local Nature Reserve. It comprises hospital buildings, some of which originated as the Union Workhouse, together with car parking. To the south the site is wooded hillside, with some trees (Sycamore, predominantly) coming down into the site. Overall, despite the heritage assets, the site is in poor condition. The landscape sensitivity is moderate, given its proximity to Whinless Down. Redevelopment should respect this setting.</p>				
<p>Biodiversity The site may well support bat roosts, given the age of some of the buildings and the proximity of trees and grazing land. Common reptiles are also likely to be present. Tree cover, predominantly Sycamore, needs to be assessed in respect of bat roosts, but has no significant intrinsic interest. Subject to the findings of any bat surveys, there appears to be no biodiversity constraint to redevelopment.</p>				
EIA Screening: would be necessary due to size			Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required and dependent on the number of other sites coming forward in Coombe Valley, specific screening may also be required.	

Green Infrastructure

The site abuts a major piece of green infrastructure (Whinless Down and High Meadow) that is well used by residents, for recreation and as a short cut to Tower Hamlets and the local schools. The opportunity for accessing this GI must be maintained and, where possible enhanced, by creating a substantial green link right through to Coombe valley Road, which, in turn could provide a level ground pocket park for the less physically able.

Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site has an extensive frontage to Coombe Valley Road, with existing accesses in numerous places along the site frontage.

Comments relate to the whole Coombe Valley Area

There are likely to be issues with the signalised bridge on Coombe Valley Road for an additional 500 dwellings over that already approved but not built. A transport assessment would be required collating these sites as it is difficult to look at each in isolation and judge the cumulative effect on the bridge.

Alternative routes into and out of this area are not likely to be that attractive either due to their widths or traffic orders. Eric Road and Oswald Road are traffic calmed, St Radigunds Road is one way from London Road to Magdala Road and Bunkers Hill is one way towards London Road. Abbey Road which connects Coombe Valley with the rural area of River could be used but this is single track for much of its length.

There is a bus route around Coombe Valley and the London Road stops connect into the wider bus route system.

It is difficult to state at what time the railway bridge pinch point would reach a limit as other factors would need to be taken into account. The inclusion of robust travel plans would be one element and the adjustment of the signal timings could also have an effect.

Access to Services Initial SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The Triangles Community Centre is located to the west. There are a number of bus stops along Coombe Valley road, and the current use of the site as a hospital means that the site is well served with frequent buses. The bus services provide connections to the Town Centre. A primary school is located within a ten minute walk of the site. The hospital currently provides a number of medical services, however the nearest GP Surgery is located in the town. There are a number of local shops in Coombe Valley, including a takeaway.

Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership Initial SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The Stage 1 Report detailing initial findings of the Coombe Valley Regeneration Initiative identified a number of opportunities and areas for change. At present the future use of the hospital site is unconfirmed. It is understood that redevelopment plans are being progressed for a new hospital to be located on the current car parking area. If this scheme was progressed it is expected to release the remainder of the site for redevelopment. Findings from Stage 1 of the Regeneration Initiative suggest a new heart to the area should be planned, to bring together old and new residents, and should the hospital site be released for redevelopment it offers the opportunity to create this.

Given the scale and extent of existing development, costs of demolition and clearance could be

considerable. A more detailed inspection of the site may identify a number of buildings which are worthy of retention and conversion.

Consider for inclusion in the Submission Document?

Yes

- Opportunity for contemporary urban design
- Possible inclusion of a new 'heart' to the valley

Site Code NS06DOV	Address Land at Barwick Road and St. Radigunds Road, Dover	Parish Dover	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 1.44 ha	
		Hierarchy Secondary Regional Centre			
Current Use SHLAA Score:					
Description of Site The site is roughly triangular in shape, and lies approximately ten metres above the road. It is currently unmanaged scrubland, although there are some dilapidated sheds reflecting a previous use as a small-holding towards the roadside. Abbey Road, to the south of the site, is a rural single width road. To the east are residential properties located on St. Radigund's Road, to the south are industrial units, forming part of the Poulton Close Industrial Estate. The site is located within the AONB.					
Policy Alignment SHLAA Score:					
The site is located outside, but adjacent to, the urban boundary. It is located within the AONB.					
Physical Constraints SHLAA Score:					
The site is located on a steep slope. The boundary with Abbey Road is heavily treed.					
Flood Risk					
The site is located within Flood Zone 1 which would be appropriate for residential development.					
Historic Environment					
No considerations					
Landscape Impact					
Any development of the site would have a detrimental impact on the AONB. The site is an important urban fringe site which softens the hard edge of the urban area created by the properties on St. Radigund's Road.					
Biodiversity					
Part of the site a St Radigunds Valley Local Wildlife Site and development would be contrary to Policy CP7. Previous use of the site may have been a deterrent to common reptiles.					
EIA Screening: The site would need to be screened under S2.10		Appropriate Assessment: The site would have to contribute to the Thanet Coast SPA mitigation strategy.			
Green Infrastructure					
The site is within the AONB and the northern part is Open Access Land. It has PROW EB 7 running along the southeastern boundary. Part of the site is designated for its biodiversity value. Gorse Hill and Coombe Down constitute important GI elements of Dover town and development of this site					

would compromise this, by both physical loss and change of ambience.

Proximity to Road Network SHLAA Score:

Due to the difference in levels, of approximately ten metres, access onto St. Radigund's Road would be problematic. At the junction with Abbey Road the speed limit changes from National Speed Limit to 30 mph. In order to achieve adequate visibility/sight lines all of the frontage vegetation would need to be removed.

Access to Services SHLAA Score:

A school and a bus stop are located within a five minute walk, and a GP Surgery is located in the town. Bus routes provide connectivity to the town centre. Buckland Hospital is located within the Coombe Valley area, providing important medical facilities and services to the town as a whole.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

As a result of the change in levels it could be difficult for access to be achieved. The site is located within the AONB and consequently any development of the site would have a detrimental landscape impact. In addition, the land is Open Access Land, with part of the site designated for biodiversity. The site contributes to the GI network, and should not be lost for redevelopment.

Consider for inclusion in the Submission Document?

No

Site Code NS03DOV	Address Land to East of former Co-Op Dairy, Holmestone Road	Parish Dover	Overall SHLAA Score 27.5 - Undeliverable	Area 1.31 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>The site is located just off Poulton Close, the industrial area of Coombe Valley and comprises vacant land. An access road has been provided and this extends into the site, however this has been blocked at the entrance to the depot. A depot bounds the site to the west and is not contained within the site boundary; to the south are other industrial uses. To the north and east is undeveloped open land. The site is not uniform in level, and to the south the site is bounded by a very high retaining wall.</p>				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park				
The site is located within the urban boundary, and also within the AONB.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
There is a significant change in levels between Abbey Road and Holmestone Road				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>Any development of the site could have a detrimental impact on the setting of the AONB. The topography of the site is such that any development would sit in a prominent position above the valley and this would be visible in both short and long distance views. Residential development over one storey in height, and could have prominence in the landscape.</p>				
<p>Biodiversity</p> <p>The site appears to be abandoned previously developed land which is reverting to a semi-natural state. Without detailed survey it is not possible to determine whether the site would come under the UK BAP ‘Open Mosaic Habitats on Previously Developed Land’. It is likely to support common reptiles. The chalk faces of the cutting will support a limited chalk flora.</p>				
EIA Screening: The site is large enough to require screening under S2.10		Appropriate Assessment: A contribution to the Thanet Coast SPA Mitigation Strategy would be required.		
Green Infrastructure				

The site is isolated from surrounding countryside by virtue of being in a chalk cutting. It lies within the AONB. It would be difficult to increase any GI value in the site, except by extensive ecological restoration, to re-connect the site the adjacent hillside.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

An access road has been provided into the site; however this has been blocked at the entrance to the Industrial unit. This is of a good quality, with a footpath on one side.

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The Triangles Community Centre is located nearby. There are a number of bus stops in close proximity; however these are not well related to the site given the gradients in the area. The bus services provide connections to the Town Centre. A primary school is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 3.0 - Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Due to the neighbouring uses, namely of an industrial nature, the potential for housing on this site is limited. This is compounded due to the sole access being through an extensive length of the industrial estate, which often has cars parked on both sides of the road.

The site is located within the AONB, and given the topography of the site any development of the site would be prominent in the landscape. Further investigation would need to be undertaken to ascertain whether the development of low-rise industrial sheds, in keeping with the surrounding area, would also have a detrimental impact on the setting of the AONB.

Policy DM2 of the adopted Core Strategy seeks the protection of employment land and buildings. Given that the access has been blocked for some time we would dispute how extensive any marketing of the site has been. Evidence would need to be submitted to show that development of the site for employment uses is now unviable.

Consider for inclusion in the Submission Document?

No

Site Code DOV10	Address Land to the west of Hillside Road	Parish Dover Town	Overall SHLAA Score = 27	Area 1.22 ha
		Hierarchy Secondary Regional Centre		
Current Use Initial SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation.				
Description of Site The site is located to the south of Crabble Athletic Ground and to the east are residential properties on Hillside Road. Land between 67 and 73 Hillside Road has been submitted as a suitable access, although this is overgrown. The site is covered with numerous trees which have matured overtime, and lies immediately adjacent to the AONB to the south. There does not appear to be a clear boundary to the south/west where the site meets the AONB.				
Policy Alignment Initial SHLAA Score: 3.0 – Completely Outside Development Envelope and no designation but impacting upon Environmental Constraints The site lies outside, but immediately adjacent to the urban boundary.				
Physical Constraints Initial SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows, to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact Currently the site is benefiting from benign neglect, which with the increase of the tree cover has visually enhanced the separation the AONB from the rear of housing on Bunkers Hill.				
Biodiversity There is a likelihood of biodiversity interest on the site. The scrubland to the rear has now matured into woodland and that would encourage some species (e.g. birds) at the expense of others (e.g. common reptiles).				
EIA Screening: There would be a requirement under S2.10 for screening		Appropriate Assessment: There would be a need to contribute to the Thanet Coast SPA mitigation. Traffic impacts on Lydden and temple Ewell Downs SAC may also need consideration.		
Green Infrastructure The site does not form part of any GI linkage, in that it forms a stub of land between the AONB and the rear of housing. It is essentially abandoned and that is reflected in urbanisation impacts. The tree				

cover which is developing ensures the screening from the AONB and development would cause this to be lost and increase the risk of urbanisation impacts directly on the AONB. The only nearby PROW is EB6 to the SE, but some distance from the site.

Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There would be sufficient sightlines to provide an access between 67 and 73 Hillside Road. There is a change in level to access the site and the maximum gradient for adoptable road would need to be achieved. An alternative access off Minnis Terrace would not be suitable because of steep gradients and mature trees. As such, a secondary access could not be provided and the site would be limited to 50 units.

Access to Services Initial SHLAA Score: 4.5 – Site with at least 2 of 3 from : public transport, GP surgery and school within 5 minutes walk

The site is located to the south of River. The site is well located for the services and facilities on offer in River. Kearsney Railway Station is within a ten minute walk and the Primary School would be approximately five minutes away. River also has a Co-op mini-market and a Chinese takeaway.

At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.

Market Attractiveness Initial SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership Initial SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site would be limited to 50 units given that it would not be possible to achieve a secondary access. If the site were developed then this is likely to lead to increased pressure at the boundary of the site to the AONB, resulting from development of the site, this could lead to felling of the woodland. In turn this could lead to the erosion of the AONB at this point. The site is not therefore considered suitable for development due to the adverse impact any development would have on the AONB and its setting.

Consider for inclusion in the Submission Document?

No

Site Code SHL096	Address Crabble Athletic Ground – land to south east off Minnis Terrace, River	Parish Dover Town Council	Overall SHLAA Score 23.5 (Undeliverable)	Area 2.9ha
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
Description of Site				
Note: Please read this form in conjunction with forms for SHL068 and SHL098.				
An irregular shaped site which rises steeply from Crabble Avenue to the north and follows the curvature of the adjacent athletics ground to the north. The site consists of protected mature trees to the north where the land rises steeply to two areas of hard standing (formerly used as tennis courts). The remaining upper half of the site consists of a meadow surrounded by mature trees. This area is adjacent to the AONB.				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park				
Only a small area of land to the north of the site is within the urban boundary. The site is protected open space and part of the site is adjacent to the AONB.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Only a small area of land to the north of the site is within the flood zone.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
Development of this site would have a detrimental impact on the setting of the AONB. Restricted development to the two terraced tennis courts would also have a detrimental impact on the AONB as this would result in the removal of trees in this area and at the access point and through related urban paraphernalia (such as light columns, new road surfaces etc).				
Biodiversity				
Apart from the presence of mature trees, the biodiversity interests are limited. Common reptiles are to be expected here.				
EIA Screening: S2.10		Appropriate Assessment: in-combination mitigation for Thanet Coast SPA required and screening for cumulative impacts on Lydden and Temple Ewell Downs SAC.		
Green Infrastructure				
The site takes the form of informal parkland; its use for recreation is unknown. There is a limited biodiversity GI link from Coombe Down/Gorse to the River Dour as the railway embankment lies opposite the existing access on Crabble Lane. Although limited in scope, this is one of the few such GI connections for urban wildlife and should be maintained.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct				

access to site	
<p>Minnis Terrace is very steep and does not meet Kent Design standards with regards to gradient. The adjoining houses would make any adjustments to the gradient unlikely. The junction visibility is also poor and cannot be improved as there are houses in the way (Kingswood Villas).</p> <p>The other point of access would be from Crabble Road; this would result in the loss of a number of established mature trees to allow an adoptable road to be constructed onto the site. To provide the visibility splay third party land would be required. Crabble Road also lacks footway on this side of the road which would need to be addressed. The topography of the land would also be problematic.</p> <p>The topography and access problems will make this site difficult to progress. If the Athletic ground is to be kept open then any layout would also have to take this use into consideration.</p>	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
<p>The site is well located for the services and facilities on offer in River. Kearsney Railway Station is within a ten minute walk and the Primary School would be approximately five minutes away. River also has a Co-op mini-market and a Chinese takeaway.</p> <p>At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.</p>	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
<p>Development of the site would have a detrimental impact on the setting of the AONB and a suitable access cannot be achieved. Even if small scale development was proposed there would be concern that, due to the removal of trees, there would be detrimental impact on the setting of the AONB.</p>	
Consider for inclusion in the Submission Document?	No

Site Code SHL098	Address DDC owned site – Crabble Athletic Ground – former cricket pitch	Parish Dover Town Council Hierarchy Secondary Regional Centre	Overall SHLAA Score 23.5 (Undeliverable)	Area 6.9ha Indicative No. of units @ 30 dph = 207
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Note: This site will only come forward if an alternative location for the recreation facility is secured. Please read this form in conjunction with forms for SHL068 and SHL096.</p> <p>Flat oval shaped site located on hillside (terraced) consisting of managed grass with an athletics track running around perimeter. Site also has club house to the southern boundary. The northern boundary drops to Crabble Avenue forming a bank which has a line of mature trees (these have tree preservation orders). The surrounding uses include a football club to the southwest and meadow/trees to the south (both on higher land) and residential properties to the northwest and northeast of the site (lower than site). Mature trees follow the northern boundary line. The AONB lies immediately south of the site.</p>				
<p>Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park Site is within the urban boundary but is designated protected open space (Policy DM25).</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3 A small element of the northern corner of the site falls within the Flood Zone.</p> <p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment No considerations</p>				
<p>Landscape Impact The site currently contributes to a soft sub-urban boundary to Dover and River. This would be lost with development at 30 dph. The site is elevated and despite the tree cover could have a detrimental impact on the setting of Crabble Lane (e.g. through garden paraphernalia). There would also be potential for adverse impact the AONB which abuts the southern boundary of the site, behind the club house unless the density were reduced, to maintain a soft interface with the countryside.</p> <p>Biodiversity The site has limited biodiversity interest, due to its management for sport. There could be a minor enhancement of urban biodiversity with garden development.</p>				
EIA Screening: required (S2.10)		Appropriate Assessment: in-combination mitigation would be required for Thanet Coast. Screening for potential impact on Lydden and Temple Ewell Downs SAC would be required.		
<p>Green Infrastructure The site is an integral part of GI and protected by Policy CP7. In terms of the GI Network, this area lies within a wider 'conserve and create' area. This applies particularly to the AONB, but must also</p>				

address GI which forms part of its setting.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There are two access points, one onto Crabble Avenue to the northeast and one onto Crabble Road to the northwest. The access onto Crabble Avenue would result in the loss of a number of established mature trees to allow an adoptable road to be constructed onto the site. To provide the visibility splay third party land would be required. Crabble Road also lacks footway on this side of the road which would need to be addressed. The topography of the land would also be problematic since the site is raised above the road.

Access onto Crabble Road is currently used for the sport/recreation uses on the site. It would need to be upgraded to adoptable standard and there is sufficient land to achieve this. The indicative number of units (207) would require at least a secondary emergency access.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is well located for the services and facilities on offer in River. Kearsney Railway Station is within a ten minute walk and the Primary School would be approximately five minutes away. River also has a Co-op mini-market and a Chinese takeaway.

At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site is currently used for recreation and development of the site would only be considered should an alternative location for the recreation facility be secured. Development of the site would also have a detrimental impact on the setting of the AONB. The site also has only one possible access onto the site which would restrict the number of units given for the scale proposed a secondary emergency access would be required.

Consider for inclusion in the Submission Document?

No

Site Code SHL068 (SAD18)	Address Crabble Athletic Ground – football ground & practice pitch	Parish Dover Town Council	Overall SHLAA Score 31.5 (11-15 Years)	Area = 2.77 Ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 83
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
Description of Site				
Note: This site will only come forward if an alternative location for the recreation facility is secured. Please read this form in conjunction with forms for SHL098 and SHL096.				
Rectangular shaped, flat, site consisting of an informal practice area (to the west of the site) and formal football club (which consists of a club house, spectator stands and parking). The practice area has mature trees on three sides separating it with the adjoining residential properties and scrub land. The site is higher than the neighbouring athletics ground, which lies to the north east of the site.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation The formal pitch, which is designated as protected open space on the Proposals Map, is within the urban boundary but the informal area is outside. The football pitch adjoins the AONB to the east.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is located on the hillside overlooking the athletics ground and residential properties. Development at 30dph would have a detrimental impact on the wider landscape and the AONB. There would be pressure to remove mature trees which currently screen the site but could cause shading.				
Coastal Change				
Biodiversity The site abuts St Radigunds Valley LWS, which is identified as being important for its chalk grassland and chalk woodland. The site itself has some indicated potential for chalk grassland development, although this may relate more to the tree-covered slopes than the flat grassland. The practice area is likely to support common reptiles.				
EIA Screening: if more than 0.5 has, screening will be necessary under S2.10		Appropriate Assessment: if more than 15 houses are proposed, there would need to be contribution to the Thanet Coast Spa mitigation. There would also be a need for considering potential impacts on other European sites nearby.		
Green Infrastructure The practice ground is crossed by a very well-used footpath, EB17, which enters Lewisham Road by well-maintained path and steps. It provides a useful link across to River Recreation Ground and from there to the Dour. Therefore, there is well-established recreational GI which should not be compromised. The football ground itself does not currently appear to conform to the multifunctionality requirements for GI. The biodiversity interest in both areas is limited but development of a linear green				

park enclosing the existing footpath could be used for biodiversity enhancement.

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility

The site is accessed by a narrow road which also serves the Athletics track. Existing site access from Crabble Avenue would need to be upgraded to provide adoptable layout if 10 houses are proposed. This would involve loss of parking bays to provide visibility and loss of trees to improve access road within the site.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is well located for the services and facilities on offer in River. Kearsney Railway Station is within a ten minute walk and the Primary School would be approximately five minutes away. River also has a Co-op mini-market and a Chinese takeaway.

At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Development of this site would have a detrimental impact on the wider landscape and the setting of the AONB. There would also be a loss of protected open space and recreational facility, however the development potential of the site should only be considered should an alternative location be secured for the recreation facility.

Consider for inclusion in the Submission Document?

No

Site Code NS05DOV	Address Land at Crabble Lane, River	Parish Dover	Overall SHLAA Score 24.5 - Undeliverable	Area 5.15 ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Please read this form in conjunction with forms for SHL068, SHL098 and SHL096 The site is located to the south west, and rear, of the football ground. To the north west the site is bounded by the rear gardens of properties located on Crabble Lane. There is a change in levels with the site being significantly higher (by approximately two metres) than Crabble Lane. The site slopes steeply from north to south, and is therefore very prominent. The site is heavily treed and borders the AONB to the south.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation				
The site is located outside but adjacent to the urban boundary and adjoins the AONB to the south.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
The site is heavily treed, located significantly higher than the adjacent Crabble Lane.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact In the southwest, part of the site lies within the AONB and this also bounds the site to the southwest. Any development of the site would have a detrimental impact both on the AONB and its setting. This is compounded by the level change enhancing the site's prominence in the landscape.				
Biodiversity The site is part of Gorse Hill, an important chalk grassland spur above Dover. It has been abandoned for a number of years, giving rise to scrub and secondary woodland of Ash and Sycamore but parts are now coming under grazing management. It has great potential for reversion to chalk and neutral grassland. It will support common reptiles.				
EIA Screening: It is of sufficient size to require screening (2.10)		<input type="checkbox"/>	Appropriate Assessment: There would be a need to contribute to the Thanet Coast SPA <input type="checkbox"/>	

	Mitigation strategy. It may also require in-combination assessment for impacts of Lydden and Temple Ewell Downs SAC.
<p>Green Infrastructure</p> <p>The site is important both for biodiversity (see above) and for recreation, being crossed by PROW EB17 which links with EB6 to form an important footpath network linking Coombe Valley to Crabble. The whole site is designated Open Access Land (CRoW Act 2000).</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>It may be possible to achieve access to the site from Crabble Lane which is within a 30mph speed limit. Given the gradient constraints it may not be possible to achieve a suitable access. Junction spacing with The Ridgeway will need to be considered. A crossroads will not be appropriate unless it can be shown that the 85th percentile traffic speeds do not exceed 20 mph in this area. A left/right staggered junction would require 30m spacing. If access were achievable a footway contribution would be required across the site frontage to link with the existing footway to the north east.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>The site is well located for the services and facilities on offer in River. Kearsney Railway Station is within a ten minute walk and the Primary School would be approximately five minutes away. River also has a Co-op mini-market and a Chinese takeaway.</p> <p>At the time of writing the GP surgery was located in River, it has since moved to Lydden. The SHLAA scoring has not been updated to reflect this.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>This site would only warrant further investigation if the other three sites put forward at Crabble (SHL068, SHL096 and SHL098) are released for future development and alternative recreation facilities secured. The rationale for this would be to enable comprehensive redevelopment of the site; this would ensure that an improved access could be achieved. Notwithstanding this, any development would need to have regard to the AONB, Open Access Land considerations and the contribution to GI and biodiversity. The site currently provides a transition between the built form and the countryside and is a valuable asset to locals for walking.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL062	Address Land adjacent to Former Melbourne County Primary School	Parish	Overall SHLAA Score 35 (6 -10 years)	Area 0.35 Ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 11
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
Description of Site				
<p>This is the triangular piece of land which is located to the north of KCC offices. There is no direct vehicular access to the site; however, subject to the necessary consents, access is achievable off the existing access to KCC offices. At present, the entire site has extensive tree cover. To the east of the site lies existing residential properties, which front Melbourne Avenue, and to the west of the site further undeveloped land is located, again with significant tree coverage.</p>				
Policy Alignment SHLAA Score: 8.0 – Within development envelope (settlement boundaries) and/or non-housing designation or housing allocation site outside development envelope				
The site is located within the Urban Boundary.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Landscape Impact				
<p>The Buckland Valley, a chalk coombe, has become degraded since WW2, as initially housing was established and then the remaining chalk grassland abandoned to scrub. A relatively small addition of housing would not, in itself, cause significant landscape character change, but would contribute to the visual impact already occurring. Since the area is not designated for landscape, this is insufficient justification, alone, to recommend the site not be allocated</p>				
Biodiversity				
<p>The site abuts the Whitfield Down and Buckland Down LWS, designated for chalk grassland. In this general area the grassland has succeeded to chalk scrub and this appears to be the case for the site which shows no significant change in plant community structure from the adjacent LWS. Therefore, it is reasonable to consider the site has potential for chalk grassland restoration. This is supported by KCC/KWT habitat opportunity mapping. This is a site where there may be a possibility of some form of biodiversity offsetting, whereby the adjacent LWS is brought back into management in exchange for the loss of this site to development. Currently, the site is unlikely to support much wildlife interest.</p>				
EIA Screening: too small to need consideration			Appropriate Assessment too small to need consideration	
Green Infrastructure				
<p>The site is rather isolated with houses to the northeast and former school to the southeast. A public footpath (EB11) runs parallel to the northwestern boundary but is completely separated by scrub. Following on from the biodiversity section, there would be benefit in GI terms if the wider Buckland Valley were returned to accessible chalk grassland, otherwise the site is GI neutral.</p>				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

The site does not connect to the public highway. If access was sought via the former school car park access then the road would need to be laid out to an adoptable standard and include footway/cycleway connections to the new site. The road should be adopted under a Section 38 Road Agreement.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is within a five minute walk from a bus stop, with frequent services both to Dover Town centre and to the employment and facilities located in White Cliffs Business Park. At the time the SHLAA was carried out the adjacent County Primary School at Melbourne Avenue (now KCC offices) was open, however it has since closed.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Subject to securing the necessary access arrangements from KCC, the site could be considered suitable for development. However, given the impact any development on this site would have on the adjacent Local Wildlife Site (LWS), for development to take place this would require an agreement to enhance the LWS (biodiversity offsetting).

Recommend for inclusion in the Submission Document?

Yes

Subject to biodiversity offsetting, whereby the adjacent LWS is brought back into management in exchange for the loss of this site to development.

Site Code LDF08	Address Factory building, Lorne Road	Parish	Overall SHLAA Score 36.50 (6-10 years)	Area 0.25 Ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 8
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
Description of Site				
<p>To the north of the site lies existing terraced properties, to the east the site fronts the road, and to the south the River Dour runs alongside the site boundary. To the rear of the site, there is thick tree cover. There is currently a vacant factory building on site, which is single storey in height and covers the entire road frontage. It was most recently used as a Steel Designs factory. A planning application for 16 dwellings (reference DOV/10/00233) was withdrawn in 2011. This followed a 2007 application for 37 flats, which was also withdrawn (reference DOV/07/00204).</p> <p>Located opposite the site, a Former Car Sales site (St. Martin's Yard) has been granted consent for 5 three bed houses and 7 one bed flats.</p> <p>This site is currently under construction, and significant works have been carried out to ensure the site is protected from the risk of flooding.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is located within the Urban Boundary.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Flood Risk				
The site is located within Flood Zone 3; alternative sites should therefore be considered. However, as part of the 2010 withdrawn planning application, the Environment Agency (EA) raised no objection subject to stringent conditions. Nonetheless, it would be a requirement of any planning application that the Sequential and Exceptions test are satisfactorily met.				
Landscape Impact				
The local landscape character is evolving towards a fully residential area. Redevelopment would further this process, leading to townscape gain by the replacement of a bland factory unit with a more interesting design that also capitalises on the nearby river and trees.				
Biodiversity				
Although a modern factory, the period of abandonment has been such that a scoping survey for bat roosting will be necessary, given the good bat habitat along the river. The trees also need to be assessed. Depending on the precise location of the trees, there may be potential for increasing light levels on the riverside.				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be required.	
Green Infrastructure				

The potential to improve the riverside and public access should be realised if the site is developed.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The position of the existing access is unlikely to be suitable to accommodate access to the new dwellings since sight lines would cross third party land. Either a single point of access to communal parking facilities or direct frontage properties with off street parking provision would be suitable although the second option would further displace existing on street parking which is highly sought after in this area.	
Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school	
A GP Surgery is located on Buckland Avenue, and a variety of Primary Schools are within a five minute walk. The nearest bus stop is located on Buckland Avenue providing a service to the town centre, however this is easily within walking distance. There are a number of facilities on offer in the town centre including the Dover Discovery Centre, and Dover Priory railway station.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
The SHLAA gave the site an exceptions score of 2.0 to reflect the fact that it's a derelict factory in an established town centre residential area which could be developed as part of a town centre regeneration scheme. The site is located in close proximity to a number of services and presents an opportunity to improve the urban townscape.	
The site is, however, located within Flood Zone 3, and whilst there are methods of mitigating the risk (for example those submitted in relation to the Former Car Sales site opposite), alternative sites should be considered in the first instance.	
If there are no alternative sites, this site should be considered for inclusion.	
Recommend for inclusion in the Submission Document?	Yes
Flood Risk	

Site Code DOV22	Address Whitecliff House, Poulton Close, Coombe Valley	Parish	Overall SHLAA Score Not scored in the SHLAA as located within the AONB	Area 2.18 Ha
		Hierarchy Secondary Regional Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>The site lies to the south of Poulton Close and comprises Whitecliff House and associated external areas (including car parks). It has just been re-launched as the Dover Innovation Centre (March 2012). Beyond the site to the south is open countryside, although this is heavily treed and part of the valley side. To the east and west of the site lies established employment uses, and the land to the north has outline planning consent for residential development.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is located within the Urban Boundary: a small portion of the site (to the west) is located within the AONB. The site is in employment use and prior to the adoption of the LAD any planning application (for a non-employment use) would be required to comply with Core Strategy Policy DM2.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Landscape Impact The site lies within an industrial estate but is partially within the AONB. Pragmatically, the AONB boundary needs revising, rather than constraining redevelopment at this site. Redevelopment could provide a more sympathetic interface with the countryside to the south, instituting character change. There may be pressure to remove trees to the south, but even if this were feasible (dependent on land ownership) this would not necessarily lead to significantly increased visual intrusion to the countryside.</p> <p>Biodiversity The south of the site is a chalk bank which may be significant for biodiversity. If trees on the top of the bank were partially cleared, chalk grassland could be re-created. It is unlikely that the site supports protected species, except for reptiles that might use the chalk bank.</p>				
EIA Screening: screening would be necessary due to AONB		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation would be necessary.		
<p>Green Infrastructure</p> <p>The land to the south is open access downland, now scrubbed/wooded over and is Whinless Downs and Long Wood LWS. Redevelopment could provide managed access to the downland, perhaps linking to the ridgeline path EB5. Softening of the frontage could be achieved by use of linear SUDS.</p>				
Proximity to Road Network SHLAA Score: --				
<p>The position of the existing access is unlikely to be suitable to accommodate access to the new dwellings since sight lines would cross third party land. Either a single point of access to communal parking facilities or direct frontage properties with off street parking provision would be suitable although the second option would further displace existing on street parking which is highly sought after in this area.</p>				

Access to Services SHLAA Score: --	
A bus stop is located within a five minute walk of the site and the Primary School would be within a ten minute walk. Bus routes provide connectivity to the town centre. Buckland Hospital is located within the Coombe Valley area, providing important medical facilities and services to the town as a whole.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
Given that the site is currently in operation as the Dover Innovation Centre, and is located within an established employment area, it is considered that the site should not be considered for an alternative use at this stage. Whilst the LAD covers the period to 2026 there will be a subsequent process to consider sites beyond this time. In order to give certainty to prospective tenants (for the Dover Innovation Centre) it is suggested that the site could be part of any future process for consideration of sites beyond 2026.	
Recommend for inclusion in the Submission Document?	No

Site Code DOV24	Address Land at Roman Road	Parish Dover Town	Overall Initial SHLAA Score = 28.5	Area 0.49 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units @ 30 dph = 14.7
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site				
<p>The site lies immediately to the north of the railway line and within a larger site (submitted as PHS007). The site is bounded by the railway line to the south and beyond that lies existing residential development. On the three remaining sides is open countryside: the site does not have any boundary delineation to the north and west. Thus the site effectively forms part of a much larger area (PHS007); this vast area has good landscape qualities.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely Outside Development Envelope with no other designation or non housing designation				
<p>The site lies outside, but immediately adjacent to, the urban boundary.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
<p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
Landscape Impact				
<p>It appears that the northern boundary of the site is a field boundary with trees while the west is not bound and progresses through to horse-related activities associated with Rix's scaffolding. The landscape quality of this area (the Guston Hills LCA) has recently been assessed for the White Cliffs Landscape Partnership Scheme and the recommendation here is to 'conserve and create' by removal of landscape detractors and enhancement of hedges. Development in this area would, therefore, be contrary to the findings of the assessment. It would also exacerbate the presence of the scaffolding yard which is detrimental to the setting of Dover town and the countryside to the north.</p>				
Biodiversity				
<p>Part of the site is Long Hill and Coombe Hole LWS with the 2003 wildlife habitat survey indicates it predominantly as neutral grassland, although creation of chalk grassland in parts is feasible.</p>				
EIA Screening: required if more than 0.5 ha land is involved			Appropriate Assessment: contribution to the Thanet coast SPA mitigation strategy required if more than 15 houses proposed.	
Green Infrastructure				
<p>The single track Roman Road becomes the North Downs Way to the north and thus this route is of national importance for recreational walking. Development could harm this GI asset. Additionally, there are existing and potential biodiversity assets which could be improved upon and this area has been highlighted in the Core Strategy for such improvements, particularly relating to conservation management.</p>				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				
<p>The only access to the site is along Roman Road, a single track, from Old Charlton Road. The track is partially unmade and there are a limited number of passing places. The footways end at the junction with Old Charlton Road and do not continue up Roman Road. The bridge over the railway would be</p>				

sufficient in isolation. Poor alignment of the carriageway offers very substandard forward visibility and the lack of pedestrian safeguarding would render additional use of this lane by motor vehicles hazardous to all users. However, the lane leading to it in both directions is not of a sufficient width or standard to support additional development.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from public transport, GP surgery and school within 10 minutes walk

St. Edmunds Catholic Primary School is located within a ten minute walk of the site. All other shops, services, and facilities, are located within Dover town centre, which would take longer than ten minutes to walk to.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is not suitable for residential development, since it would open up the wider countryside to development. The landscape qualities of the wider area are exemplary, reflecting that of the AONB. Any development proposals to the north of the railway line should be heavily resisted. Furthermore, achieving a suitable access to support the additional development proposed would not be possible.

Consider for inclusion in the Submission Document?

No

Site Code LDF030	Address Buckland Mill, London Road	Parish Dover Town	Overall Initial SHLAA Score = 39 0-5 years	Area 2.6 ha
		Hierarchy Secondary Regional Centre		Indicative No. of units = 406 as per planning applications
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
Description of Site				
<p>Buckland Mill occupies an important and prominent location within a predominately residential area. The whole site covers nearly four hectares and is bounded to the north east by Crabble Hill. To the north is a heavily treed railway embankment; providing an attractive visual backdrop to the site. The southern/south-western boundary is Crabble Meadows, a narrow lane that can be accessed from Crabble Hill at the southeastern end of the site.</p> <p>Approximately one third of the site has the benefit of full planning permission for a mixed use scheme, including up to 141 dwellings, A1 retail, a 'community hub' and B1 offices within the converted Buckland House. The scheme includes a series of public spaces and the formation of a new vehicle access to the north west of the mill building, from Crabble Hill. This is now under construction, and this site form examines the remaining two-thirds of the site. This remainder has the benefit of outline planning consent for up to 265 dwellings and an 80 bed care home.</p>				
Policy Alignment SHLAA Score: 7.0 - Sites within Development Envelope (settlement boundaries) with no designation				
The site lies within the urban boundary.				
Physical Constraints SHLAA Score: 2.0 - Within or partially within Flood Zone 3				
Flood Risk				
The southern part of the site is located within Flood Zone 2, and only the areas immediately adjacent to the River Dour are located within Flood Zone 3a.				
Heritage				
The landmark former mill building along Crabble Hill, (Grade II) Listed Buckland House, and neighbouring St Andrews Church are all located outside of the site. It is important to ensure that any development of this portion of the site is designed and laid out to complement these Heritage Assets.				
Landscape Impact				
The site is set to the west of London Road and falls towards the River Dour. There would be some local landscape impact on the street scene, but otherwise the site is contained.				
Biodiversity				
The River Dour runs through the site and any development should enhance the quality of the river here, in terms of both the geomorphology and the ecology of the river. Because of the proximity of the river, the site will also be attractive to bats and certain birds, such as swifts and swallows. Development of the site should enhance roosting and nesting opportunities for such species.				
EIA Screening: necessary due to size			Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be necessary	

Green Infrastructure	
The major GI element in the site is the River Dour and, with due consideration of the requirements of wildlife (e.g. lighting), access should be increased. The river may be a very attractive feature that can enhance the contact between people and biodiversity. The site design should enable a general permeability through the site for the enjoyment of people from the wider area.	
Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site	
Vehicular access to the residential development should be achieved from the existing vehicular access point off Crabble Hill and the reopening of the vehicular access in the centre of the site off Crabble Hill. Access to the Community Hub and the associated employment uses, which already have detailed planning consent, should be from the existing vehicular access road that is located off Crabble Meadows. These accesses should remain separate for vehicular users, i.e. a through route should not be created.	
Access to Services SHLAA Score: 6.0 - Within 5 minutes walk of bus and GP surgery and school	
Bus stops are located on Crabble Hill and provide connections to Dover Town, River and Temple Ewell and beyond to Canterbury. Shatterlocks Infant and Nursery School is within a five minute walk, as is Buckland Medical Centre.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 5.0 - Single Public Sector Ownership	
Analysis	
Approximately one third of the site has the benefit of full planning permission for a mixed use scheme, including up to 141 dwellings, A1 retail, a 'community hub' and B1 offices within the converted Buckland House. At present, the remaining portion of the site has the benefit of outline planning permission. In the event that this permission is not implemented, and to ensure that the site is retained for residential development, this part of the site is considered suitable for a residential development.	
Consider for inclusion in the Submission Document?	Yes

Deal

Sites submitted as part of the LDF process, within Urban Confines, but now have Planning Permission

Site Code	Location	Total No / Outstanding	Planning Application Reference	Notes
PP003	Timber Yard, Mill Hill	10/0 10/10	DOV/05/00699 DOV/07/00113	Phase I - Completed Phase II - no application.
LDF023	North Barracks, Canada Road	93/36 6/6	DOV/05/00578 DOV/10/00193	Under construction
DEA23	Land behind Gymnasium, South Barracks	9/9	DOV/08/00863	Not started
DEA34	Cannon Street	69/69	DOV/09/00873	16 Under construction
PP004	Reservoir, St Richard's Road, Deal	14/14	DOV/07/01224	Not Started
SAD05	Hall on the corner of Mill Hill and Freeman's Way	4/4	DOV/11/00288	Not started
LDF09	The Yew Tree PH, Mill Hill, Deal	Retail	DOV/11/00859	Conversion under construction

Site Code NS04DEA	Address Redhouse Wall	Parish Middle Deal and Sholden	Overall SHLAA Score Ramsar SPA / Flood Risk – not scored.	Area 4.78ha
		Hierarchy District Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, irregular shaped site located on land to the north of Deal. The site is divorced from the urban area of the town. To the north of the site there is an established caravan park consisting of approximately 50 static caravans with separate warden accommodation. To the west and east there are open fields. The railway line forms the southern edge of the site. The Royal Cinque Ports Golf Club lies 355 metres to the east of the site.</p> <p>The site is currently used for permanent pasture. The site appears to be almost entirely surrounded by drainage channels (the exception being adjacent to the railway line, where there is an embankment). The western and northern borderlines are also delineated by sporadic scrub and trees.</p> <p>The site has been suggested for a caravan/leisure park to provide holiday accommodation.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is located 0.66km outside of the urban boundary and so would be contrary to Policy DM1 (Settlement Boundaries). The site would also be contrary to policy DM15 (Protection of the Countryside- fifth point regarding loss of ecological habitats) and DM16 (Landscape Character).</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site is within Flood Zone 3. The site is also within the Maximum Breach and Rapid Inundation Zone, as modelled in the Council's Strategic Flood Risk Assessment. Holiday or short let caravans are classed as a More Vulnerable use and should be subject to the sequential and exceptions testing. Alternative sites outside this flood risk zone should be considered.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas near to the site.</p> <p>Landscape Impact</p> <p>There would be adverse landscape character and visual impacts in respect of the relationship with Fowlmead Country Park and other receptors, such as the Royal Cinque Ports Golf Club and the wider network.</p> <p>Biodiversity</p> <p>The site falls within an area designated as a SPA & Ramsar site and within an area identified as a SSSI. The proposal is for additional mobile homes to be used for tourism. This would encourage further recreational uses into a sensitive area. Development would, therefore, have a detrimental impact on the designated nature conservation areas by virtue of increasing levels of urbanisation and recreation whilst simultaneously reducing the physical size of the protected area. Development would be contrary to the Conservation of Habitats and Species Regulations 2010.</p>				
EIA Screening: S.2.12e – Caravan Parks			Appropriate Assessment: as a single proposal and in-combination	

Green Infrastructure	
The site is subject to Core Strategy Policy CP7, there are no mitigating measures that would avoid harm to the special interest of this area.	
Proximity to Road Network SHLAA Score: --	
This site does not directly abut public highway. Golf Road becomes a private road, which serves this site, the golf club, a further caravan park, a restaurant and forms a second access into the Sandwich Bay Estate. This is a narrow, single carriageway, road. Redhouse Wall, which is off this part of Golf Road and serves the site and the existing caravan park, is a bridleway of single track width and an unmade surface. There is poor visibility at the junction of the bridleway and Golf Road. Golf Road is private at this junction. The site would not be suitable for the proposed use as a caravan park in its current form in terms of access. Access for both vehicles and pedestrians would need to be substantially improved and link with the adopted highway to support a more substantive proposal. The site is also a significant distance from the nearest bus stop.	
The site is not suitable for further development.	
Access to Services SHLAA Score: --	
The site is located outside of the urban area and is, therefore, not close to any local services. There is, however, a golf club close to the site.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site falls within European designations for nature conservation (and contrary to Conservation of Habitats and Species Regulations 2010) and within Flood Zone 3, the Maximum Breach and the Rapid Inundation Zone. The use of the site for a caravan holiday park would have a detrimental impact on these designated sites and would not be a suitable use in the Flood Zone. There would also be a loss of land, which currently contributes to the Green Infrastructure network in the District. This would be contrary to Council adopted Policy. In addition, the access to the site would be unsuitable for further tourist related vehicle movements.	
Consideration for inclusion in the Submission Document?	No

Site Code DEA04M	Address Water Treatment Works, Golf Road	Parish Deal Town	Overall SHLAA Score Not Scored – Flood Risk	Area 0.79 Ha
		Hierarchy District Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat irregular shaped site located on the northern edge of Deal consisting of scrubland (southern part of the site) and managed grassland (northern part fronting Golf Road).</p> <p>The northern part of the site was used for underground water storage and also appears to have been used for informal games as there are old/self constructed goal posts. Trees (which are now well established) have been planted within the northern part of the site, along the eastern boundary and along the internal access road (which runs along the southern boundary). There is an old iron railing fence running along the frontage of Golf Road (to the east). There is a single gate in this fence located to south for pedestrians. Running parallel to the fence, set back into the site, there is a small dyke. This links with another one which runs along the northern boundary of the site. These are possible associated with the flood attenuation in north Deal.</p> <p>There is a vehicular access to the south of the frontage which leads to the site and adjacent water works. This is not included within the site boundary.</p> <p>Neighbouring uses consist of residential, allotments, agricultural and land associated with the Golf club. There are European nature conservation designations situated further to the north of the site (SAC, SPA & Ramsar). The nearest designation is approximately 460 metres away.</p> <p>The site has been suggested for mixed use with housing located on the front part of the site with recreational or community uses (such as a playground or open space) to the rear.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is outside the urban boundary. The north eastern, and a small section of the south eastern, boundary abut the confines. As the site does not project further to the west or north of the existing development, if it was considered suitable for development, the existing confines could easily be amended to include this site.</p> <p>The south western half of the site has been identified as open space on the Dover District Proposals Map. The eastern part, which has the old goal posts, is not but both areas are covered by Policy DM25 (Open Space). The Council are currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms. The site should be retained until these standards can be used</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site is within Flood Zone 3, within the Maximum Breach and Rapid Inundation Zone. Alternative sites should, therefore, be explored for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas close to the site.</p>				

Landscape Impact

The site is located on the edge of the town with development to the south and east. This existing built form would act as a backdrop to any new development, so there would be no detrimental impact on longer landscape views and the setting of Deal.

Biodiversity

The site is likely to support common reptiles, which might require translocation, and there is a linkage by ditches to wider network to the west and north. The grass area is mown infrequently, in the same way that wild flower meadows are managed, but there are only a few plant species present. Ornamental trees are planted to the north of the site. There are insufficient onsite ecological constraints to exclude this site.

EIA Screening: S2.10 screening required – urban infrastructure project >0.5ha

Appropriate Assessment: screening as a single proposal, due to proximity to Sandwich Bay SAC, and in-combination recreational impact on Thanet Coast SPA

Green Infrastructure

The site appears to lie between elements of GI (allotments to the south west and SAC etc to the north), however, the habitats present are different. Land drainage considerations emphasise the role for SuDS if the site is to be taken forward.

Proximity to Road Network SHLAA Score: --

The site fronts Golf Road, which at this point narrows, and there is an existing access for water treatment works (outside the site area). The existing access has poor sight lines and would not be suitable for any development. There may, however, be an opportunity to create a new access for both the existing and any new development. The existing access would need to be closed if this was to happen.

Access to Services SHLAA Score: --

The site is within five minutes walk from a bus stop (Stagecoach route 15a). A local store is within ten to fifteen minutes walk away from the site (corner of King Edward Road and Godwin Road).

Market Attractiveness SHLAA Score: --**Ownership SHLAA Score: --****Analysis**

Although development of the site would not have a detrimental impact on the wider landscape or ecology and an access may be possible, the site lies within Flood Zone 3, within the Maximum Breach and Rapid Inundation Zone, as identified in the SFRA. Alternative sites for residential use should, therefore, be considered.

Consideration for inclusion in the Submission Document?

No

Site Code SHL052	Address Land at Golf Road, Deal.	Parish Deal Town	Overall SHLAA Score 26	Area 1.97Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 59
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation.				
<p>Description of Site</p> <p>Flat, rectangular, site located on the north eastern edge of the town consisting of agricultural land that has been set aside. Land to the south of the site (see SHL87) has also been suggested for development and also appears to be set aside agricultural land. There is residential to the north and to the east and agricultural land to the west.</p> <p>A hedgerow runs down the northern and western boundaries. Just beyond the northern hedgerow there is a strip of undeveloped land that is outside the area suggested for development. This separates the site from the neighbouring residential development to the north (Lanfranc Road/Miller Close).</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation.				
The eastern boundary is adjacent to the urban boundary whilst the northern boundary is separated from the confines by the narrow strip of land (described above) outside of the site boundaries.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3.				
<p>Flood Risk</p> <p>The site is within Flood Zone 3, the Maximum Breach and the Rapid Inundation Zone (RIZ). The site has also been identified in the Strategic Flood Risk Assessment as a site vulnerable to flooding from other sources (such as heavy rain fall or overtopping of the sea defences). Alternative sites should, therefore, be explored for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas near to the site.</p>				
<p>Landscape Impact</p> <p>Although the site is located on the edge of the town, the wider landscape impact would be minimal. The site has development on two sides and is contained within that urban form. At a local scale, however, development of this site would result in the creation of a long narrow strip of undeveloped land, some 12 meters wide for access to the fields to the north west. This would have a detrimental impact on the immediate area around. If this strip of land was included within the development area, these issues could be avoided.</p>				
<p>Biodiversity</p> <p>Site bounded to north and west by ditches, otherwise arable/ex-arable. Enhancement possible, through use of SUDS and possible reduction of agrochemical infiltration (such as agricultural/fertilizer run-off) into the watercourses. There is no reason to exclude this site.</p>				

EIA Screening: S2.10 screening required – urban infrastructure project .0.5ha.	Appropriate Assessment: Screening as a single proposal, due to proximity to Sandwich Bay SAC and in-combination recreational impact on Thanet Coast SPA
<p>Green Infrastructure</p> <p>Appropriate use of SuDS would maintain and potentially enhance ditch network. There is a distinct lack of green walking routes in the vicinity; however, there appears little opportunity to improve on these partly due to the design of neighbouring developments.</p>	
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>From the information given in the representation, there appears to be no direct access onto the site from a public highway. It would have to be assumed that any development on the site would need third party land to secure an access.</p> <p>The most obvious access would be onto Golf Road via what appears to be the current agricultural access/private road, but this would also pass existing dwellings (which are also served by this access). The junction spacing criteria has been reduced with the introduction of Manual for Streets and a wide range of factors are now considered. The potential access point onto Golf Road would normally have junction spacing problems with Golf Road Place and Athelstan Place. The potential interaction between these junctions, however, is likely to be extremely minimal so cross movements over Golf Road are highly unlikely (Golf Road Place is a small cul-de sac serving very few properties and Athelstan Place does not provide a connection since this is also a cul-de-sac). Subject to enough land being available at this location to accommodate a new access to incorporate footway provision and meet minimum geometric standards KCC Highway do not see this as being a problematic entry point to serve the development proposed. The access and development layout would need to meet adoptable standards. At above 50 dwellings, a secondary means of access will also need to be provided. Kent Highway Services would have no objections to this site being developed subject to the above criteria being satisfactorily met.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is within five minutes walk from Sandown County Primary School and of a bus route (Stagecoach 15a), which runs along Western Road, Golf Road. The site is also within five minutes walk of an existing corner shop (Ark Lane) and to the new Doctors surgery and community centre, which is under construction, at the Cannon Street site.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is in a location close to local facilities and the impact of further development on the wider landscape would be minimal, the site is located within Flood Zone 3, the Maximum Breach, Rapid Inundation Zone and flooding from other sources. Alternative sites should, therefore, be considered (or other less vulnerable uses could be considered). Furthermore, the submission did not identify an access so third party land would appear to be required. If this was overcome it would appear that a suitable access could be achieved.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL087	Address Land to the rear of West Lea, Deal	Parish Deal Town	Overall SHLAA Score	Area 3.3 Ha
		Hierarchy District Centre	27 Undeliverable	Indicative No. of units @ 30 dph = 99
Current Use SHLAA Score:				
<p>Description of Site</p> <p>Rectangular, flat site located on the north eastern edge of the town consisting of agricultural land that has been set aside. There is similar land use adjacent to the site to the north (see SHL52).</p> <p>There are residential properties to the south and east of the site. Mature trees are located along the western boundary, beyond which there is agricultural land.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p>				
<p>The southern and eastern boundaries of the site abut the urban boundary.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p>				
<p>Flood Risk</p> <p>The site is within Flood Zone 3, the Maximum Breach and partly within the Rapid Inundation Zone. The site has also been identified in the SFRA as being vulnerable to flooding from other sources (such as heavy rain fall or overtopping of the sea defences). Alternative sites should, therefore, be considered for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas near to the site.</p> <p>Landscape Impact</p> <p>Although the site is located on the edge of the town, the wider landscape impact would be minimal. The site already has a backdrop of existing development on two sides, to the east and south, and there is a line of trees along the western boundary. The impact on the wider landscape would, therefore, be minimal.</p> <p>Biodiversity</p> <p>Arable/ex-arable field with line of trees to north west. No biodiversity constraints to development.</p>				
<p>EIA Screening: S2.10 screening required – urban infrastructure project > 0.5 ha</p>			<p>Appropriate Assessment: Screening as a single proposal, due to proximity to Sandwich Bay SAC, and in-combination recreational impact on Thanet Coast SPA.</p>	
<p>Green Infrastructure</p> <p>None present. Development would require SuDS and probably linkage to existing nearby ditch system.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access appears to be suggested from The Fairway. This road already caters for 47 dwellings so using just this access, development would be limited to just three dwellings. If the site was to be</p>				

developed to its full potential, a secondary access would also be required. Provided no ransom strips are involved, a second access may be achieved from Cannon Street/West Lea. Due to the nature of the crossroads junction of Cannon Street and Golf Road, a Transport Assessment would be required for this site. Subject to the outputs of the TA being satisfactory this site has the potential for development in highway terms.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk.

The site is within five minutes walk from Sandown County Primary School and of a bus route (Stagecoach 15a), which runs along Western Road / Golf Road. The site is also within five minutes walk of an existing corner shop (Ark Lane) and to the new Doctors surgery and community centre.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 - Single Private Ownership

Analysis

Although the site is in a location close to local facilities, the impact on the wider landscape would be minimal and a suitable access may possibly be achievable, the site is located within Flood Zone 3, the Maximum Breach, partly within the Rapid Inundation Zone and within an area susceptible to flooding from other sources. Alternative sites should, therefore, be considered for residential development.

Consideration for inclusion in the Submission Document?

No

Site Code NS03DEA	Address Redundant Factory Site – Land at Ark Lane Deal	Parish Deal Town	Overall SHLAA Score 34.5 6 - 10 Years	Area 0.56 Ha
		Hierarchy District Centre		Indicative No. of units @ 30 dph = 17

Current Use SHLAA Score: 4.0 - Partially occupied single use site

Description of Site

Rectangular site located within a residential area in north Deal. The site currently consists of one large single storey factory building (split into three units), which covers the majority of the site. This building is located slightly off centre (to the east) within the site with hard standing to the south (front) and western side. There are grassed/scrub/trees on the remaining land to the north and east. There appears to be young self sown trees (6 to 8 m high) along the front boundary. The vehicular access is located to the south onto Ark Lane between two small areas of grassed open space (not within site area) which are approximately 3m wide.

The residential properties to the south front Peter Street (which runs parallel to Ark Lane), so the site fronts onto the rear of those properties. The residential properties in the surrounding area consist of modern flats and new terraced housing. There is, however, a terrace of Listed Buildings, fronting College Road, that back onto the eastern boundary of the site.

To the north lies Cannon Street, a mixed use development that includes a Doctor’s surgery, community centre and 69 residential units (flats and houses). This development is currently under construction.

Policy Alignment SHLAA Score: 7.0 - Sites within development envelope (settlement boundaries) with no designation

The site falls within the urban boundary and is on previously developed land. As the site was last used as employment land, Policy DM2 would apply. It would need to be demonstrated that an employment use is no longer viable on the site before land could be allocated.

Physical Constraints SHLAA Score: 2.0 - Within or partially within Flood Zone 3

Flood Risk

The site falls within Flood Zone 3. Further modelling in the Dover Strategic Flood Risk Assessment (which assumes a breach in the sea defences north of Sandown Castle) indicates that the majority of the site falls within the Maximum Breach area. Only a very small strip of land at the entrance of the site is outside of this area. The site is not within the Rapid Inundation Zone.

The SFRA also indicates, however, that the site is also prone to flooding from ‘Other Sources’ (such as heavy rain fall or overtopping of the sea defences). Only a small area in the north western corner falls outside of this flooding area. Alternative sites should, therefore, be explored for residential development.

Historic Environment

There is a terrace of nine Listed Buildings, fronting College Road, on the eastern boundary of the site. The site is also just 16m away from the nearest boundary line of the Middle Street Conservation Area (which is to the south east of the site) and approximately 50m from the Nelson Street Conservation Area, to the south. Development of the site could, however, provide a real opportunity to improve the townscape in this area and, therefore, improve the setting of the Listed Buildings and Conservation Areas with the removal of the industrial units.

<p>Landscape Impact</p> <p>The site is located within the urban area of Deal, so there would be no impact on the wider landscape.</p> <p>Although it is unclear as to whether the trees along the frontage are within the site boundary, it should be noted that their removal could have a detrimental impact on the street scene.</p> <p>Biodiversity</p> <p>There are no constraints to development.</p>	
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for in-combination
<p>Green Infrastructure</p> <p>The site is extremely urban with little opportunity for GI.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>The site fronts Ark Lane and utilises an existing access. Traffic regulation corner protection markings exist. Ark Lane is of varying width but narrows to pinch points and would be unsuitable for large vehicles. Footways are substandard and inconsistent in the vicinity of the site. Ark Lane is subject to a 30mph speed limit.</p> <p>The site could accommodate 17 dwellings without any significant increase in traffic movements. The site has the potential to accommodate the proposal in highway terms.</p>	
<p>Access to Services SHLAA Score: 6.0 - Within 5 minutes walk of bus and GP surgery and school</p> <p>The site is within 5 minutes walk of a bus route (Stagecoach 15a) which runs along Western Road,/ Golf Road (at the western end of Ark Lane) and Collage Road (at the eastern end of Ark Lane). Sandown Primary School lies to the west, where Ark Lane meets Golf Road. The new Doctor's Surgery being is immediately north of the site on Cannon Street.</p> <p>There are a number of other facilities in the immediate area. These include a corner shop (at the western end of Ark Lane), a community centre (currently under construction) and two public houses (The Saracens Head and the Jolly Gardener). The north end of the High Street (the start of the retail area) is also within 10 to 15 minutes walk away.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Subject to employment use viability, the site would be suitable for development as an access is achievable, development could enhance the townscape in the area (and the setting of the Conservation Areas and Listed Buildings) and the site is in a position close to local facilities, such as a school and bus route; and this will improve with the completion of the Doctor's surgery and community centre. The site is, however, within a flood risk area, falling within Flood Zone 3, Maximum Breach and flooding from Other Sources. Alternative sites should, therefore, be explored for residential development.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS02DEA	Address Land at Courtmarsh Farm and Park Avenue Motors, Albert Road, Deal	Parish Deal Town	Overall SHLAA Score	Area 1.76 Ha
		Hierarchy District Centre	30.5 11-15 Years	Indicative No. of units @ 30 dph = 52 (assuming all land area)
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located in the northern part of Middle Deal. The site consists of hard standing and a derelict residential building to the front of the site (south east) and a long, light industrial unit to the south. The remainder of the site consists of scrub, trees and grassland, and has been submitted separately as SHL049. The eastern half of the site, which fronts Albert Road has been allocated for business uses in the Dover District Local Plan (saved Policy LE5).</p> <p>To the south of the site there are residential dwellings. To the west there are industrial units and undeveloped land. The undeveloped land has recently been granted permission for additional industrial units (Minter's Yard). To the north there are builders merchants.</p> <p>It was suggested in the representation made that residential development could be located on the previously developed land (adjacent to the existing residential) to the south (within the urban boundaries) and business uses on the remainder.</p>				
Policy Alignment SHLAA Score: 8.0 – Within development envelope (settlement boundaries) and/or non-housing designation or housing allocation site outside development envelope				
The area of land allocated under Policy LE5 of the Dover District Local Plan is within the urban boundaries. The additional land is outside. The need for additional employment land is not yet clear.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
<p>Flood Risk</p> <p>The site has been suggested for a mixed use consisting of employment and residential. The site is, however, located within the Flood Zone 3 and the majority of the site, including the frontage (and the main access), within the Maximum Breach area identified in the SFRA. Only a couple of small areas on the boundary line (including part of the remaining industrial unit) are outside of the Maximum Breach area. The site is not within the Rapid Inundation Zone.</p> <p>The Deal Transport and Flood Modelling, which is currently been undertaken, may provide additional information as to whether the site would be suitable for residential development.</p> <p>Historic Environment</p> <p>There are three Listed Buildings within the vicinity of the site, along Southwall Road, but these are not adjacent to the site. Development would not affect the setting of these buildings.</p> <p>Landscape Impact</p> <p>The site is located against the backdrop of existing development (Minters Yard, Matthews Close and the Builders Merchants). The site is also contained within the railway line, so there would be limited impact on the wider landscape.</p>				
<p>Biodiversity</p> <p>The site comprises two fields, ex-arable for some considerable period and is bound to north, west and south by ditches with scrub and hedgerows. Buildings are present on the site. The ditch</p>				

<p>network could be enhanced to provide SUDS and biodiversity linkage to the countryside. Likewise, although the hedgerow habitat may not qualify under Natural Environment and Rural Communities Act Section 41, enhancement could provide a link and useful urban biodiversity. Buildings may require bat survey, but with the above considerations, there are insufficient ecological constraints to exclude this site.</p>	
<p>EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha</p>	<p>Appropriate Assessment: screening for in-combination</p>
<p>Green Infrastructure</p> <p>The site is rather isolated. Main biodiversity linkages are ditches; bespoke connections to the wider PRow network for external recreation would be needed. The site is not part of mapped Green Infrastructure Network, thus GI is not a constraint.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>The Dover District Local Plan allocation has indicated that access onto Albert Road is poor and that before development could commence a number of improvements would have to be undertaken. These were:</p> <ol style="list-style-type: none"> a. the provision of a signal controlled junction; b. the closure of the existing access to the Timber Yard and Builder Centre; c. adjustments to the junction layout at Albert Road and Middle Deal Road; d. traffic calming measures in Middle Deal Road; e. creation of a new priority junction at Albert Road/London Road together with the widening of both Albert Road and London Road and the improvement of pedestrian facilities; and f. new pedestrian refuges in London Road. <p>These improvements could still be relevant today. Until a detailed scheme is submitted it is impossible to say what measures will need to be taken. A transport statement will be required (not necessarily a full TA) to demonstrate the likely movements around the proposed junction arrangements. Kent Highway Services would not rule out the possibility of development for this site in highway terms.</p>	
<p>Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school</p> <p>The Queen Street Surgery, Deal railway station and Sandown Primary School are within 10 minutes walk. The town centre is a little further away (approximately 15 minutes walk away). A new surgery at Cannon Street is even closer to the site.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located in a position that would have a limited impact on the wider landscape, and is located close to local facilities. The site, however, falls within Flood Zone 3 and within the Maximum Breach area. Alternative sites for residential outside of Flood Zone 3 should be considered in the first instance. If the relevant studies indicated that there is a need and that flood risk can be mitigated, the site may have potential. If residential is found not to be suitable, the additional land for employment would need to be justified.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code DEA24	Address Land adjacent to Minters Yard, Southwall Road, Deal	Parish Deal Town	Overall SHLAA Score Not Scored – Flood Risk	Area 3.4 Ha
		Hierarchy District Centre		Indicative No. of units @ 30 dph = 102
Current Use SHLAA Score: N/A				
<p>Description of Site</p> <p>Irregular shaped, flat site located on the north edge of Middle Deal. The site consists of paddocks and fields with scrub along the boundaries.</p> <p>There are industrial units and farm/former tip to the west of the site, residential to the south, undeveloped land to the east (Minters Yard, which has planning permission for industrial units) and farmland to the north.</p> <p>The site has also been included as part of the larger site, NS07DEA, for mixed development.</p>				
Policy Alignment SHLAA Score: N/A				
The site is adjacent to the urban boundaries along the eastern boundary.				
Physical Constraints SHLAA Score: N/A				
<p>Flood Risk</p> <p>The site is within Flood Zone 3 and the Maximum Breach area. Alternative sites should, therefore, be considered for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas adjacent to the site. There are, however, three Listed Buildings at the junction of Southwall Road and Middle Deal Road 0.3 km to the east.</p>				
<p>Landscape Impact</p> <p>The landscape impact would be minimal. Southwall Road Industrial Estate has already been established to the west and this has already introduced urban form into the countryside. This would be in the foreground of any development at this site. There could be a detrimental impact when travelling by train into and out of Deal as the urban form would be consolidated in this area if it was developed. The area around the site comprises a mixture of built development and open areas and this mix acts as a transitional area between urban and countryside. This, however, is a minor point and should not act as a constraint to development. The frontage to Southwall Road is bounded by a low hedgerow where there is no current access point. It is likely that for access to be achieved the entire length of this hedgerow will need to be removed. Whilst this needs to be investigated further, it is not expected to be an overriding constraint to development.</p>				
<p>Biodiversity</p> <p>The most recent (2003) wildlife survey (KCC) appears inaccurate when compared with aerial photos (2007, Google Earth, accessed May 2011) and a far older wildlife survey (1990, ND surveyor). Standing water/reed bed appears to be present, together with scrub and pastures separated by a complex set of ditches. Together these could comprise NERC S.41 Coastal and floodplain grazing marsh. The site may be important for amphibians, bats and invertebrates. It supports a variety of passerine (perching) birds. Without evidence to the contrary, the site should not be taken forward, but see GI considerations below.</p>				

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for in-combination.
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Green Infrastructure

This is an urban fringe site that is not currently mapped as GI. It has limited potential for recreational interconnectivity, its primary GI attributes being for biodiversity. There may be a limited potential in providing urban wildlife (the surrounds are primarily commercial). The complex of ditches and existing pond/reed bed indicate that hydrology could be a constraint to development of the site.

If this site were to be considered as part of a larger scheme (NS07DEA), its role could be one of limited development with open space. The latter could provide recreational and footpath linkage between Western Road and Albert Road to Southwall Road and onwards to Fowlmead. Biodiversity enhancements could also follow.

Proximity to Road Network SHLAA Score: N/A

The site will need achievable sight lines to the access which may involve third party land, improved footway provision and accessibility to public transport within a reasonable walking distance. A Transport Assessment will definitely be required for this number of units in this location and a Travel Plan. The site has some potential in highway terms provided access requirements are achievable.

Access to Services SHLAA Score: N/A

The nearest bus stop would be on Albert Road, which would be over ten minutes walk away. The nearest Doctor's would be the new surgery on Golf Road. There are, however, employment uses adjacent to the site.

Market Attractiveness SHLAA Score: N/A

Ownership SHLAA Score: N/A

Analysis

Although development of this site would not have a detrimental impact on the wider landscape, it is within Flood Zone 3 and within the Maximum Breach area in the SFRA. Alternative sites should be considered for residential development. The site may be important for amphibians, bats and invertebrates and supports a variety of passerine birds. Without evidence to the contrary, development would have a detrimental impact on this wildlife and the site should not be taken forward.

The site, as part of a larger mixed scheme (NS07DEA), may, however, be suitable for the provision of recreational and footpath linkage between Western Road and Albert Road to Southwall Road and onwards to Fowlmead.

Consideration for inclusion in the Submission Document?	No
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Site Code NS07DEA	Address Land between Albert Road and Southwall Road, Deal	Parish Deal Town	Overall SHLAA Score	Area 11Ha
		Hierarchy District Centre	25 Undeliverable	Indicative No. of units @ 30 dph = 330 (Based on total land area for housing)
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large irregular shaped site located on the edge of the northern part of Middle Deal, adjacent to the railway line, which incorporates other suggested development sites (DEA24, SHL049 & NS02DEA).</p> <p>The extent of the site covers an area from Albert Road (including the saved Local Plan allocation of Albert Road – Policy LE5), to Southwall Road. The site, therefore, shares three boundaries (west, north and east) with Minters Yard (the allocated site - Policy LE4, which now has planning permission). The railway forms the north eastern boundary line.</p> <p>There are different uses ranging from agricultural land, scrub land, builders merchants and derelict land. To the south of the site there are residential dwellings. To the north there are agricultural fields.</p> <p>The site has been suggested for mixed use.</p>				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
Approximately a third of the site (the Albert Road employment allocation) is within the urban boundaries.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
<p>Flood Risk</p> <p>The site has been suggested for mixed use and is located within the Flood Zone 3 and the maximum breach area. A very small area to the north of the site is also within the Rapid Inundation Zone. Alternative sites should be considered for residential development. Employment uses may, however, be appropriate.</p> <p>Historic Environment</p> <p>There are three Listed Buildings within the surrounding area close to the site, along Southwall Road, but these are not adjacent to the site. Development would not affect the setting of these buildings.</p> <p>Landscape Impact</p> <p>The site is located against the backdrop of existing development (Minters Yard, Southwall Road Industrial Estate, Matthews Close and the Builders Merchants). The site is also contained within the railway line, so there would be limited impact on the wider landscape. There could be a detrimental impact when travelling by train into and out of Deal as the urban form would be consolidated in this area if it was developed. Currently the area has development and open areas and this mix acts as a transitional area between urban and countryside. This, however, is a minor point and should not act as a constraint to development.</p>				

Biodiversity

The western part of the site should not be taken forward alone (see DEA24). There are no overriding constraints to development of the eastern part of the site (see NS02DEA). Site SHL049 appears as scrub/rough grassland. The northern part of the site is a timber yard.

There is considered to be biodiversity interest (1990 Habitat Survey) that would constrain development in the western part of the site (DEA 24), but which could be enhanced as part of a larger GI package and also act as a deflector from European Sites.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha

Appropriate Assessment: screening at least for in-combination

Green Infrastructure

The site has potential to form a large recreational GI link between North Deal, Sholden and Fowlmead, with recreational deflection from Sandwich Bay SAC and southern end of the Thanet Coast SPA. Additionally, a mainly peripheral part of the site which is considered to be rich in biodiversity could be enhanced. GI considerations indicate that the land covered by NS07DEA should come forward as a whole.

Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site

The site fronts Southwall Road and Albert Road. The Southwall Road access position has its visibility severely impaired by being on a bend in the road and an established hedge forming the boundary treatment. There is a footway up to the site and one opposite the site. Southwall Road is 30mph in this location and not subject to traffic regulation orders. The Albert Road access is located next to the railway line level crossing. Albert Road has a 30mph speed limit and is subject to traffic regulation orders on both sides of the carriageway at this location (double yellow lines). Sight lines are achievable for an access in this location.

The Dover District Local Plan allocation has indicated that access onto Albert Road is poor and that before development could commence a number of improvements would have to be undertaken. These were:

- a. the provision of a signal controlled junction;
- b. the closure of the existing access to the Timber Yard and Builder Centre;
- c. adjustments to the junction layout at Albert Road and Middle Deal Road;
- d. traffic calming measures in Middle Deal Road;
- e. creation of a new priority junction at Albert Road/London Road together with the widening of both Albert Road and London Road and the improvement of pedestrian facilities; and
- f. new pedestrian refuges in London Road.

These improvements are still relevant today.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The Queen Street Surgery, Deal railway station and Sandown Primary School are within 10 minutes walk. There is a bus route along Albert Road. The town centre is a little further away (approximately 15 minutes walk away). A new Doctors has been constructed at Cannon Street, which would be closer to the site.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost**Ownership** SHLAA Score: 3.5 – 2-3 Ownerships**Analysis**

The whole site is located in a position that would have a limited impact on the wider landscape and is located close to local facilities. There are concerns with the access, flood risk and the need for further employment land. If the relevant studies indicated that there is a need, that flood risk can be mitigated, and the ecology surveys do not raise any importance, then the site may have potential for employment use.

It would be advantageous to consider the site as a whole rather than individual areas for development as this would provide opportunities to improve biodiversity and green infrastructure in this area.

Consideration for inclusion in the Submission Document?

Yes

Employment

Site Code	Address	Parish	Overall SHLAA Score	Area
SHL049	Land adjacent to Minter's Yard and Court Marsh Farm, Deal	Deal Town	23.5	1.76 Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 53
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Flat, rectangular shaped site, located on the northern edge of Middle Deal. The site is part of a larger field, the portion to the east being allocated for employment uses in saved Local Plan Policy LE5 (Albert Road). Land to the west of the site, Minter's Yard, has also been allocated in the Local Plan and has planning permission for employment uses. Land to the south and north is agricultural (see SHL090) and scrub respectively. To the south of the site, within the trees and scrub, there is a large ditch running along the boundary line. This site also forms part of NS02DEA and NS07DEA.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The east and west boundaries are adjacent to the Urban boundaries.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Flood Risk The site is within Flood Zone 3 and the Maximum Breach area, which was modelled in the Council's SFRA. Alternative sites should, therefore, be explored for residential development.				
Historic Environment There are no Listed Buildings or Conservation Areas near to this site.				
Landscape Impact The site falls between two employment allocations, Minters Yard and Albert Road. Development of this site would, therefore, not have a detrimental impact on the wider landscape.				
Biodiversity Previously arable (1990 survey) this site appears to be scrub/coarse grassland. As such it will have some limited biodiversity value, but this is unlikely to be sufficient to warrant exclusion of this site, as there would be potential for enhancement through ditch management and SUDS. This site has its greatest potential for biodiversity enhancement as part of NS07DEA.				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha			Appropriate Assessment: screening required for in-combination	
Green Infrastructure The GI currently present on the site is of limited value, both biologically and hydrologically. Development might benefit both, but to limited effect. There would be potential for substantial benefit if this site were part of NS07DEA because a greater land take could form GI.				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
From the information provided there is no indication as to where the access will be from. The site would, therefore, require third party land and so appears to be landlocked.	
Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school	
Sandown County Primary School is within ten minutes walk away and there are bus stops along Albert Road. The site is also close to employment land.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 - Single Private Ownership	
Analysis	
Although development of the site would not have a detrimental impact on the wider landscape, the site is within Flood Zone 3 and within the Maximum Breach area. Alternative sites for housing should therefore be considered. There is also no obvious access onto the site so it is doubtful if development of this site would be achievable.	
The site may, however, be suitable for other uses as part of NS07DEA.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL090	Address Land Adjacent to Matthew's Close, Deal	Parish Deal Town	Overall SHLAA Score 23.5	Area 2.67Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 80
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Broadly rectangular shaped site located on the northern edge of Middle Deal. The site is flat and currently used for agriculture.</p> <p>There are employment uses to the west (Minter's Yard), residential to the south and east and agricultural fields to the north (SHL049). There are mature trees along the western and northern boundaries and a mixture of trees, hedging and fencing along the southern and eastern boundaries, reflecting the individual tastes of the residents beyond.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site abuts the urban boundaries on three sides (to the west, south and east).				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
<p>Flood Risk</p> <p>The site falls within Flood Zone 3 but not within the Maximum Breach or Rapid Inundation Zone. A site specific Flood Risk Assessment has been undertaken by the developer and submitted as part of their representation, which confirms that the site is outside actual flood risk (Maximum Breach).</p>				
<p>Historic Environment</p> <p>There is one Listed Building adjacent to the site (no 4) and two close to the site (50m and 90m away). Development of the site would have an impact on the Listed Buildings but this can be mitigated by the design and landscaping of any scheme.</p>				
<p>Landscape Impact</p> <p>The site is well enclosed, having land either developed, or has planning permission for development, on three sides.</p>				
<p>Biodiversity</p> <p>Apart from peripheral trees and hedgerows the biodiversity interest of this site is likely to be low and not a constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha			Appropriate Assessment: screening for in-combination required	
<p>Green Infrastructure</p> <p>The site has little existing GI, a ditch to the northern boundary and boundary vegetation. It would appear amenable to SUDS feeding into the ditch network. There is limited scope for urban footpath linkages. If it were to come forward with NS07DEA, there could be highly beneficial synergy.</p>				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The current agricultural access, which is a track running between residential properties and Minter's Yard (and appears to be outside of the area submitted), onto Southwall is not suitable as the main access for the size of development envisaged but could be used as an emergency access if another access could be established. An access onto Matthew's Close would be acceptable. Any development proposals would require a Transport Assessment and a residential Transport Plan.	
Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school	
The nearest school is Sandown County Primary School and there is a bus route along Albert Road. There are GP Surgery's at Queen Street and Middle Street. The site is also 0.6 km away from the railway station and supermarket. The town centre is slightly further away.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 - Single Private Ownership	
Analysis	
The site is located in a discreet location, which is close to local facilities. Access, subject to the relevant Transport Assessments, would appear to be achievable. The site is, however, within Flood Zone 3. Whilst the site is not within the Maximum Breach or Rapid Inundation Zone, Government Guidance states that alternative sites should be considered in the first instance.	
Consideration for inclusion in the Submission Document?	No

Site Code NS08DEA	Address Land at St George's Road, Deal	Parish Deal Town	Overall SHLAA Score Not Scored – too small	Area 0.10 ha
		Hierarchy District Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Small rectangular site situated in the centre of Deal. The site forms part of a larger car park which is in operation and consists of one large tarmac area. The site is adjacent to a small business unit located at the eastern end of the site. This is currently empty.</p> <p>The northern, eastern and southern boundaries are walled (of varying heights and ages, reflecting the neighbouring uses). There is no identifiable western boundary as this continues as a car park. The main vehicular access is from the west, via the remaining car park area which is in DDC ownership. There is a pedestrian access at the south eastern corner of the site leading to the High Street.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is within the urban boundaries. The District's 2007 Deal Parking Strategy indicated that the car park had a high occupancy rate and the Director of Environment and Corporate Assets and the Parking Manager have indicated that the loss of parking spaces at this car park (approximately 46 parking spaces) would not be supported. A more modest development (just the small business unit) may be acceptable.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site falls within Flood Zone 3. The site does not, however, fall within the Maximum Breach or Rapid Inundation Zone, as identified in the SFRA.</p> <p>Historic Environment</p> <p>The site lies within the Middle Street Conservation Area and was once an orchard/nursery. There are Listed Buildings adjoining the site on the northern and eastern boundaries. St Georges Church (Grade 2*) lies to the south of the site. Sensitive design of the site (terraced) could be beneficial to the setting of the Listed Buildings and Conservation Area.</p> <p>Landscape Impact</p> <p>The site lies within an urban area. The impact on the wider landscape would be minimal.</p> <p>Biodiversity</p> <p>The biodiversity interest is extremely limited due to the hardstanding and would not constitute a constraint to development.</p>				
EIA Screening: No, under 0.5 Ha			Appropriate Assessment: No, under 15 units	
<p>Green Infrastructure</p> <p>The site provides an important urban link between West Street and the town centre and this should not be lost.</p>				
Proximity to Road Network SHLAA Score: --				
<p>The site would be accessed over private land, (car park owned by DDC). Access to the car park is good and the access to the 3 dwellings would remain in private ownership with private rights</p>				

attained. KCC Highways would not object to this proposal subject to bin stores being placed within 25m of the public highway and appropriate pedestrian access being safeguarded.

Access to Services SHLAA Score: --

The site is located adjacent to the main retail area along the High Street. The Town Council offices are also adjacent to the site. Sandown County Primary School is located within 5 -10 minutes walk away from the site. There is a Doctors surgery located at Middle Street, which is within five minutes walk of the site. Bus route 15A runs northwards along the High Street and there is a bus stop within 64 metres of the site. The mainline railway station is just over 400m away.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is located in a good position in relation to the provision of services as it is centrally located within Deal. Sensitive development could also enhance the townscape and the Conservation Area. The site is, however, located in Flood Zone 3 and could not be considered in the first instance. If the site was to be developed the link to the town centre would need to be retained for GI purposes.

The site would, however, only accommodate less than five units. As a rule, the Council will only allocate sites that can provide five or more units. The site is within the urban boundaries and could come forward now.

Consideration for inclusion in the Submission Document?

No

Site Code SAD04	Address Car park at the junction of Middle Street and Oak Street	Parish Deal Town	Overall SHLAA Score Not Scored – too small	Area 0.04 ha Indicative No. of units @ 30 dph = 1
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, rectangular shaped site located within the historic area of Deal (narrow roads and terraced buildings). The site is currently used as a car park (no vegetation, just tarmac) for local residents with permits. The access is from Oak Street. The southern (Oak Street) and eastern boundary (Middle Street) consists of railings on top of a low wall. The remaining boundaries consist of brick walls from neighbouring gardens or properties. The neighbouring uses are predominately residential although, to the west, there are shops that front the High Street.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is within the urban boundaries. The Deal Parking Strategy (2007) has indicated that the area is not particularly suited to car parking due to the narrow streets and suggests that the site could be better used as an alternative land use.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site is within Flood Zone 3 but not within the Maximum Breach area or the Rapid Inundation Zone. Alternative sites should, therefore, be considered for residential development in the first instance.</p> <p>Historic Environment</p> <p>The site lies within Middle Street Conservation Area and there are Listed Buildings to the south (4 to 8 Oak Street) to the west (114 High Street) and to the north (81 Middle Street). Sensitive development could improve the setting of the Listed Buildings and character of the Conservation Area on the corner site.</p> <p>Landscape Impact</p> <p>The site is located in the central built up area of Deal. There would be no detrimental impact on the wider landscape.</p> <p>Biodiversity</p> <p>The biodiversity interest is extremely limited and would not constitute a constraint to development.</p>				
EIA Screening: No too small.			Appropriate Assessment: No too small.	
<p>Green Infrastructure</p> <p>The site would not add any benefit to GI network</p>				
Proximity to Road Network SHLAA Score: --				
<p>There is a direct access onto Oak Street. The streets in this area reflect the historic nature and are narrow. No objections to this site being developed subject to no part of the frontages overhanging or opening outwards over the public highway. Sight lines and pedestrian visibility must be maintained to any new access. The footway will need to be reinstated at the existing access location.</p>				

Access to Services SHLAA Score: --	
The site is located within five minutes walking distance of the High Street (the retail area of Deal) and local public houses and restaurants. There is an hourly bus also running along the High Street (Route 15a). Deal station would be a ten minute walk.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site is located close to the town centre with a full range of local services and development could improve the setting of the neighbouring Listed Buildings. There is an opportunity to enhance the frontages, which this site has with both Oak Street and Middle Street. Accordingly, there could be an opportunity for a small development on this site subject to detailed design considerations. The site, however, is located within Flood Zone 3 and could not be considered for housing in the first instance.	
The site is only 0.04Ha. As a rule, the Council will only allocate sites that can provide five or more units (based on a density of 30/40 dwellings per hectare). The site is, however, within the urban boundaries and could come forward now.	
Consideration for inclusion in the Submission Document?	No

Site Code DEA01M	Address Land to the west of Middle Deal, from the railway (north) down to Sholden (south)	Parish Deal Town and Sholden Parish	Initial SHLAA Score 17.5	Area 69.9 Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 2097 (if only houses)
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large irregular site incorporating PHS009, the broad area for urban expansion identified in the Core Strategy, and consisting of agricultural fields and drainage ditches. The land gently falls to the south from Sholden.</p> <p>Middle Deal lies to the east of the site with a mixture of residential and business uses. Sholden lies to the southwest. Small lakes and agricultural fields lie to the north (over the railway line) and beyond these, there is Fowlmead Country Park. The site has been submitted for mixed use.</p>				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation				
<p>The area between Sholden and Middle Deal has been identified as an area for potential urban expansion in the adopted Core Strategy. The site is outside of the urban boundaries but the site abuts them to the south and, in part, to the east.</p> <p>The Council is currently undertaking the Deal Constraints and Opportunities Study, which will consider access and flood risk issues in this area and whether there are any development opportunities. Further land could be released for additional development subject to the findings of this report.</p>				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
<p>Flooding</p> <p>The northern two thirds of the site are within Flood Zones 2 and 3. Roughly half the site is within the Maximum Breach and approximately a third is within the Rapid Inundation Zone. Only the southern area is outside of the Flood Risk Zones and could be considered for residential development.</p>				
<p>Historic Environment</p> <p>There are Listed Buildings located within and on the edge of Sholden. These include St Nicholas Church and Sholden Hall to the south of the site and Hull Place to the northwest.</p> <p>Development at this scale would result in the loss of the separation between Sholden and Deal which is an important aspect which we would seek to retain. The portion of the site closest to the existing village of Sholden, lies in close proximity to St Nicholas’s Church. Any development in this southwestern corner of this site would need to have regard to the setting of this Listed Building.</p>				
<p>Landscape Impact</p> <p>The scale of the site would result in a major landscape impact, completely changing the character of the area. Development at this scale would also change the ambiance of Fowlmead Country Part to the west of the site.</p>				
<p>Biodiversity</p> <p>The biodiversity value of the area is probably low and restricted to the drainage ditches, common</p>				

reptiles and roosting sites for wetland birds. The primary concern would be the impact development would have on the European Designated Sites to the north east.	
EIA Screening: Essential	Appropriate Assessment: Essential
<p>Green Infrastructure</p> <p>The size of the site would have to provide mitigation for the possible impacts to the European designated sites of natural interest.</p> <p>Furthermore, the site could also provide enhanced GI links from Deal to the northern countryside.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>It would be unlikely that the roads leading to this site would have the capacity to absorb the number of additional vehicle movements likely to be generated by this potential number of dwellings. Access roads to the site are constrained by existing frontage development and have little or no scope for road widening. The site would require a Full Transport Assessment and Travel Plan and would need emergency accesses. The site would be likely to put significant pressure on the Manor Road/London Road roundabout and mitigation is unlikely to prove satisfactory. I would consider this site to be beyond development in highway terms.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The southern end of the site is located close to facilities along the A258 and Sholden. These include Sholden C of E Primary School, bus route 13 (hourly to Deal and Sandwich) and the village hall and cricket ground at Sholden. The eastern side of the site is located close to local employment, Warden House County Primary School and a local shop. The northern side is in the countryside and is not close to any facilities. The western side is, however, close to Fowlmead Park.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 1.0 – Multiple over 10 hectare</p>	
<p>Analysis</p> <p>The majority, north eastern portion, of the site is not suitable for development due to the detrimental impact development would have on the European designated nature conservation sites, the wider landscape and the setting of Sholden and Deal (including Historic Buildings). There may be some scope in the south eastern part of the site, as stated in PHS009. The majority of the site is also within Flood Zones 2 and 3, the area of Maximum Breach and the Rapid Inundation Zone.</p> <p>Development at this scale is not able to be served by existing road infrastructure.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code PHS009	Address Land between Deal and Sholden	Parish Sholden and Deal Town Hierarchy District Centre	Overall SHLAA Score 28.5 + 15 years	Area 9.67Ha Indicative No. of units @ 30 dph = 290 (Planning Application 230)
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>Irregular shaped site located on the north western edge of Deal. The site consists predominantly of agricultural land although there are small areas used as either allotments or have been left to scrub over. The land falls gently from the south to the north.</p> <p>To the west and north of the site there are agricultural fields. There are business uses to the north east of the site (Southwall Road Area) and residential to the east and south of the site.</p> <p>The site boundary was identified following a Masterplanning exercise. The District Council has resolved to grant planning permission (DOV/10/01012) for 230 dwellings.</p>				
<p>Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation</p> <p>The area has been identified for potential urban expansion in the adopted Core Strategy. The issue as to whether or not development in this area is suitable for expansion, has, therefore, already been debated.</p> <p>The site abuts the urban boundaries along the eastern and southern boundaries. The area immediately between Sholden and Deal was formerly a Green Wedge.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p>				
<p>Flood Risk</p> <p>Approximately a third of the site appears to be within either Flood Zone 2 or 3. Only a very small area in the north of the site is within the Maximum Breach area. The site does not fall within the Rapid Inundation Zone. For the Land Allocations Document, the issue is of where the site boundary should be drawn.</p> <p>The area outside the flood risk zones should be considered in the first instance.</p>				
<p>Historic Environment</p> <p>St Nicholas Church and Sholden Hall are adjacent to the southern corner of the site. Proposed development should consider the setting of St Nicholas Church. There would need to be open space to retain a sense of separation between Sholden and Deal as part of any overall scheme.</p>				
<p>Landscape Impact</p> <p>The majority of the area to the south east appears to be unused and is scrub with young trees. Land to north east is more sensitive to development due to its detrimental impact on the open countryside. To the far east of the site there is a section of land, behind 28 to 56 Church Lane and between Church Meadows and Hunters Walk, which could accommodate development.</p> <p>A master-planning exercise was carried out before the publication of the Preferred Options Draft Document. This indicated that land to the south of the site (between Sholden and Deal) should be</p>				

<p>used as open space to retain the separation between Deal and Sholden and that development should be focused on the east side of the site abutting Middle Deal. This would reduce the impact on the wider landscape.</p> <p>Biodiversity There could be some wildlife interest on the area east of Church Meadows, otherwise the site is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities.</p>	
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening, for indirect impact,
<p>Green Infrastructure There are footpaths that transcend the site and the ambiance of these should be enhanced as part of any development. There should be increased linkages to Fowlmead and identified routes to Deal seafront. SUDs should be included in any development.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Access is likely to be achievable from one or more locations. Secondary, emergency access will be required. Full Transport Assessment and Travel Plan required. Mitigation likely to be necessary to offset the impact of development traffic on the London Road/Manor Road roundabout. Existing Public rights of way will need to be maintained on their existing line or otherwise diverted under the appropriate Act. The site is unlikely to be beyond development in highway terms.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk Warden House County and Sholden C of E Primary Schools are close to the site. There is an hourly bus route along the A258 (Route 13) serving the towns of Deal, Sandwich and Canterbury but there are no bus services within the Middle Deal area.</p> <p>There is a local shop (on the corner of Church Road and Orchard Avenue) also within five to ten minutes walk away from the site. The industrial units to the north east of the site, along Southwall Road, and Victoria Hospital, to the south east, are also within walking distance of the site.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 1.0 – Lower Value, High Cost</p>	
<p>Analysis The principle of development in this area has been set in the Core Strategy. The area is limited by landscape impact and flood risk. The masterplanning exercise indicated that the land between Sholden and Deal should be open space to retain the separation between the two settlements. With regard to flood risk, in the first instance development should be limited to those areas outside Zones 2 and 3. If, when all the sites have been considered and additional land is required, as this is outside the maximum breach and RIZ, it may be considered and subjected to the exceptions test set out in PPS25.</p> <p>The Planning application has now been granted. The Urban Confines would need to be amended to reflect the planning application.</p>	
<p>Consideration for inclusion in the Submission Document? Contaminated land. Open Space designation to separate Sholden from Deal Views of Sholden Church Flood risk Public transport</p>	<p>Yes</p>

Site Code PHS010	Address Land to the north west of Sholden	Parish Sholden	Overall SHLAA Score 32	Area 6.67 Ha
		Hierarchy District Centre	6-10 Years	Indicative No. of units @ 30 dph = 200 (application 230)
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Almost rectangular site located on the north western edge of Sholden consisting of agricultural land with a dense line of mature trees along the north western and north eastern boundaries. These Trees have Tree Preservation Orders. There are sporadic mature trees along the south eastern boundary with Sholden New Road. The south western boundary consists of hedgerow and scrub. The land falls gently to the north east.</p> <p>There are open agricultural fields to the north west, low density residential (Listed Buildings) and a nursery to the north east and residential and cricket ground (DEA17) to the south east of the site. To the south west there are further open fields and a horse paddock (PHS014 & DEA19). Further residential development lies due south. There is a track, running to Cottington Lakes, abutting the north western boundary and there is a public footpath along the north eastern boundary.</p> <p>The District Council has resolved to grant planning permission (DOV/10/1065) for 230 units.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>The area has been identified as an area for potential urban expansion in the adopted Core Strategy. The issue as to whether or not development in this area is suitable for expansion, has, therefore, already been debated. The District Council has resolved to grant planning application for 230 at this site. The current Urban Boundaries run along the south eastern boundary line.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The majority of the site is within Flood Zone 1 but the northern most tip of the site falls within Flood Zone 2 and 3. This part of the site is not within the Maximum Beach area or the Rapid Inundation Zone.</p> <p>Historic Environment</p> <p>There is a group of Listed Buildings north east of the site at Hull Place. There is a line of mature trees between these and the site which would mitigate any detrimental impact of development. Additional landscaping has also been suggested in the Planning Application.</p> <p>A key issue with the development of this land is to ensure that the rural character of the area, particularly Sholden New Road, is retained as much as possible. Low density along A258.</p> <p>Landscape Impact</p> <p>The land slopes evenly down from the A258 to the west to Hull Place to the east. Mature trees run along the north west and north east boundaries of the site and would provide screening to any development.</p> <p>To reduce the impact of development on the countryside (and to keep a 'soft edge'), there would need</p>				

to be a lower density of development around the north west part of the site. The presence of mature trees around the perimeter of the site would also limit development due to shading and root networks.

Biodiversity

The presence of mature trees on three boundaries will constrain development. Not only must the root zone of the trees be avoided but the height of the trees could make them oppressive if too close to houses. The site is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening, for direct and indirect impacts,
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Green Infrastructure

Links to Fowlmead Park should be provided. Onsite landscape constraints could be used for new GI networks and for SUDs.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access is achievable onto the A258 with secondary emergency access required. Full Transport Assessment and Travel Plan required. Mitigation likely to be necessary to offset the impact of development traffic on the London Road/Manor Road roundabout. The site is unlikely to be beyond development in highway terms.

Access to Services SHLAA Score: .5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The nearest bus stop (for bus route 13 to Deal / Sandwich and Canterbury) and the school are both within five minutes walk of the site.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The principle for development in this location has been adopted in the Core Strategy. The site is located close to bus routes and a primary school and is contained within the existing tree line, so longer landscape views would not be harmed.

The planning application has now been granted. The Urban Confines would need to be amended to reflect the planning application.

Consideration for inclusion in the Submission Document?	Yes
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- Mitigation for any detrimental impact on Listed Buildings
- Protection of Trees
- Provision of road improvements
- Specifying lower densities nearer A258

Site Code DEA17	Address Cricket Ground, Sholden New Road, Sholden	Parish Sholden	Overall SHLAA Score 34 (6-10 Years)	Area 1.7 Ha
		Hierarchy District Centre		
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Square shaped site located on the current northern edge of Sholden. The site is flat and consists of managed lawn (associated with the cricket ground) and a club house, which is located in the far southern corner of the site.</p> <p>The site is located within a residential area (on three sides). There is an agricultural field to the north, which has been identified for urban expansion in the adopted Core Strategy and a planning application has been submitted to the Council. This has not yet been determined.</p>				
<p>Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park</p> <p>The site is located within the Urban boundaries but it is identified on the Dover District Proposals Map as Open Space. The loss of this open space and sports pitch to development would have to be considered against Policy DM25 in the Core Strategy. The land adjacent to the site has been identified for further development and whilst this will provide additional open space, the loss of this land would be detrimental to the provision of open space in the area. The Council are currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms. The site should be retained until these standards can be considered.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
The site is located within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment				
The site is not within or adjacent to any Conservation Areas and there are no Listed Buildings within or adjacent to the site. The nearest Listed Building (Hull Place) is located 197 m away to the north. This is located on the far side of a mature tree belt. Development would have a limited impact on the setting of the Listed Buildings located there.				
The land adjacent to the site has been identified as an area for urban expansion in the Core Strategy. A key issue with the development of this land is to ensure that the rural character of Sholden New Road is retained as much as possible. The loss of this land to development would remove the open space and change this character.				
Landscape Impact				
The site is contained within existing development. Development of this site would not have an adverse impact on the wider landscape and the setting of the settlement, particularly if considered alongside proposed development opposite on New Road.				
Biodiversity				
The mature trees on New Road may support bats, but biodiversity interest on site will be very restricted and not a constraint to development.				
EIA Screening: S.2.10 screening required – Appropriate Assessment: screening for in-				

urban infrastructure project > 0.5 ha	combination impacts required.
<p>Green Infrastructure</p> <p>The site provides open space but with low level usage. In terms of ambience it is well connected to the proposed development on the opposite side of New Road, to the mutual advantage of GI on both sites, as well as having the potential to increase its own multifunctionality. If development were to be considered, the roadside GI (existing grass verges, trees) would have to complement that planned for PHS010. There would appear to be only a limited opportunity for SUDS. Overall, GI considerations weigh against taking this site forward.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>A suitable access onto the site for up to 50 units would be achievable but this would involve the removal of one or possibly two trees along the southern side of Sholden New Road for sight lines.</p> <p>The wider road network is, however, now at capacity with the resolution to grant the neighbouring urban expansion site. A Travel Plan would be required.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is five minutes walk from bus routes on the A258 (Route 13, hourly to Deal/Sandwich and Canterbury) and Sholden C of E Primary School.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site scores reasonably well for access to services and the site would not have a detrimental impact on the wider landscape. Development of the site would, however, result in the loss of a playing field and Green Infrastructure in an area where the demand for open space will increase due to the proposed urban expansion. Development would also consolidate the urban form in this area. Furthermore, there are doubts concerning whether there is capacity in the wider road network to accommodate 50 additional dwellings.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code DEA19	Address Land off A258, Sholden	Parish Sholden	Overall SHLAA Score 34 (6-10 Years) (included within PHS014)	Area 1.19 Ha
		Hierarchy District Centre	Indicative No. of units @ 30 dph = 35	
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Flat, rectangular, shaped site located on the north western edge of Sholden. The site is currently used as paddocks for grazing horses. The site has tree/scrub cover around the northern, western and southern boundaries. The eastern boundary, which fronts the A258, has a wire fence and sporadic scrub cover. Land opposite the site, on the other side of the A258, has been identified as suitable for development in the adopted Core Strategy.</p> <p>The neighbouring uses consist of agriculture to the north west and west (site PHS014), residential to the south east and land identified for urban expansion in the Core Strategy to the north east (currently agricultural land).</p>				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation				
Only the south eastern corner of the site abuts the Settlement Confine.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings within or adjacent to the site. The nearest Listed Buildings are located approximately 0.27 km to the north east of the site (Hull Court), over the A258.</p>				
<p>From a townscape viewpoint, development of the whole site would be detrimental as this would result in a massing of development that would be against the grain of the current development and would be on the rural edge of the settlement. Low density, frontage only development, which would continue the current line of development, may be acceptable subject to landscaping.</p>				
<p>Landscape Impact</p> <p>The site is located on the edge of the urban area on the crest of a hill. It is visually contained to the NW and SW by hedges, but the presence of these cannot carry much weight as, if the land were developed for housing, these hedges would not be able to be protected. Beyond the hedgerows the land falls away giving long views and potential for adverse landscape impact. Development of the whole, or part of the, site (frontage development) would, therefore, have a detrimental impact on the landscape.</p>				
<p>The land opposite has been identified for urban expansion but that site falls away gently and is contained within mature trees.</p>				
<p>Biodiversity</p> <p>The site is likely to hold common reptiles, but these are not a constraint to development. There might</p>				

be some limited biodiversity interest in the hedgerows, but overall, biodiversity is not a constraint to development here, except in respect of potential impact on the Ramsar site.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for direct and in-combination.
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Green Infrastructure

The site provides an ambient soft urban edge. This could be lost with development. The neighbourhood is well provided with PRow and a permissive cycle route. Some routes could encourage access to the Ramsar site with consequent risk, but the indicative housing number is relatively low. There is only limited functionality for SUDS. Development would not add to GI, and overall there would be a slightly negative GI impact.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site fronts onto the A258 and the majority of the site is within the 30 mph limit. There is also a cycle route and footpath along the frontage.

No objections in principle subject to achievable sight lines and junction spacing compliance with the development of the site opposite.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is adjacent to a bus stop (bus route 13 hourly to Deal/Sandwich and Canterbury) and within five minutes walk of Sholden C of E Primary School. Sholden village hall would also be within five minutes walk of the site.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although the site is close to public transport and a school, development of the whole site at this location would have a detrimental impact on the wider landscape and intensify development on a site that currently provides a soft edge to the urban form. The topography and boundary treatment acts against this site, and is not comparable to the site opposite (PHS010).

Consideration for inclusion in the Submission Document?

No

Site Code PHS014	Address Sholden Downs North	Parish Deal Town & part in Sholden Hierarchy District Centre	Overall SHLAA Score 32 (6-10 Years)	Area 18 Ha Indicative No. of units @ 30 dph = 550
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>Large rectangular site located to the west of Sholden consisting of agricultural land and horse paddocks (DEA19). Apart from hedgerows surrounding the paddocks and a line of scrub along the western boundary, the site is open with no distinct boundary treatment. Power lines cross the site. These would have to be moved or incorporated into any development.</p> <p>There are open fields to the north, west and south (PHS011) of the site. The fields to the north east have been identified for urban expansion in the adopted Core Strategy.</p> <p>The site is located on the top of a plateau which then falls to the west.</p>				
<p>Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation</p> <p>Only the most eastern corner of the site abuts the Urban boundaries.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation areas within or adjoining the site. The nearest Listed Buildings are located approximately 0.3 km to the north east (Hull Place) across the A258.</p> <p>Development of this site would, however, be against the grain of the existing settlement as it would be protruding into the countryside at right angles to the existing development pattern. This is assuming the neighbouring site PHS011 is not developed.</p>				
<p>Landscape Impact</p> <p>The site is located on the brow of a hill and is completely open with long distance views as far as Ringwold, West Studdal and Betteshanger. There is no possibility of landscape mitigation for the size of this site. The existing configuration of fields in the urban fringe is pleasant and of human scale. Development that would entail losing these would create a less amenable urban-rural boundary. It is difficult to imagine how this site could be developed without major adverse landscape impact.</p>				
<p>Biodiversity</p> <p>The western boundary adjoins the Thanet Coast Ramsar site and SSSI. The site is arable with limited biodiversity interest (possibly farmland birds). On-site biodiversity is unlikely to be a constraint to development.</p>				
<p>EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha</p>		<p>Appropriate Assessment: essential for Thanet Coast Ramsar site and in-combination for Thanet Coast SPA.</p>		

Green Infrastructure	
Boundaries well-served with PRow, but these increase access to Ramsar site. There is a ditch to the SW. The direction of run-off along this ditch is unknown, but is likely to feed into the North Stream/South Stream complex, draining the Ramsar site. Development with SUDS upslope of this would increase flows and housing would lead to an increased risk of pollution. The current GI role of recreation, landscape and water management would be damaged by development.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
Access may scuppered now by the development proposal opposite due to roundabout junction arrangement not coming forward on A258 and a priority junction opted for. KCC Highways has no objections if junction spacing could be achieved but this is unlikely if PHS010 gets planning consent and also if DEA19 comes forward. A Transport and Travel Plan will be essential for this number of units and the impact on traffic generated by the site onto the London Road/Manor Road roundabout will require mitigation which will not be easy to achieve. This site is unlikely to achieve a nil detriment on terms of impact on the surrounding highways by way of mitigation by travel planning or improvement works and as such is not likely to be supported by Kent Highways.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is within five minutes from the bus stop on the A258 (Route 13, hourly to Deal/Sandwich and Canterbury) and Sholden C of E Primary School. Sholden village hall would also be within five minutes walk of the site.	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Development of the whole site would have a detrimental impact on the on the wider landscape and the setting of Sholden and Deal. Development would also have a detrimental impact on the GI provision and would be against the grain of the settlement. Any development would also not be supported by KCC Highways	
Consideration for inclusion in the Submission Document?	No

Site Code DEA07	Address Sholden Downs Nursery, Sholden	Parish Sholden & part in Deal Town Hierarchy District Centre	Overall SHLAA Score 34 (6-10 Years) (as part of PHS11)	Area 1.09Ha Indicative No. of units @ 30 dph = 32
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Rectangular site located on the north western edge of Deal / south western edge of Sholden. The site consists of greenhouses and sheds (located to the south east of the site) and undeveloped land to the north west. There is a line of trees running down the centre of the site of the site (from north to south) which stops at the greenhouses. There is another line of trees along the northern boundary.</p> <p>The neighbouring uses consist of agricultural land to the south, south west (PHS011) and west (PHS014), horse paddocks to the north (DEA19) and residential to the east (which fronts the A258).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The eastern boundary is adjacent to the settlement confine.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings within or adjacent to the site. The nearest Listed Buildings are Sholden Hall and St Nicholas Church, which are approximately 0.23 Km away.</p> <p>Landscape Impact</p> <p>The site is located on the brow of a hill and is open on the western boundary with long distance views as far as Ringwold, West Studdal and Betteshanger. There is, however, development to the east of the site, which would act as a backdrop, and a line of trees along the north west boundary that would reduce the overall impact. Orientation, colour and use of PV on roofs would need to be carefully designed to reduce landscape impact.</p> <p>Biodiversity</p> <p>Although there is undeveloped land to the north within the site, this is an ‘island’ bound by arable and housing. It is likely to hold common reptiles, but this should not be considered a constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: screening, for direct impact and in-combination,		
<p>Green Infrastructure</p> <p>There are existing PRoWs to NW and SE boundaries of the site extending into the countryside (and close to Thanet Coast Ramsar Site), which also link (on crossing the A258) to Fowlmead. The site would not offer benefits to the wider GI through development.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The only access is via an existing private track, which is already serving five properties and accessed off the A258. It would be unlikely that the crossroads configuration with The Street opposite would be</p>				

problematic as very few cross movements would occur. The track, however, is not suitable to serve any additional dwellings without being brought up to an adoptable standard but this is highly unlikely due to the constraints of the existing neighbouring properties.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is within a five minute walk from the bus stops along the A258 (Bus route 13, hourly to Deal/ Sandwich and Canterbury) and Sholden C of E Primary School. The site is also within walking distance of the local church and a hairdressers along the A258, the cricket ground, and Sholden village hall.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Although the site is located within the sequentially preferable Flood Zone 1, is close to public transport and a school, and, through sensitive design, any detrimental impact on the wider landscape could be reduced; the site would not be suitable for development as the access is poor. The track would have to be improved to an adoptable standard but this would not be possible due to the constraints of neighbouring properties.

Consideration for inclusion in the Submission Document?

No

Site Code DEA18	Address Playing field of Sholden Primary School, Sholden	Parish Sholden	Overall SHLAA Score 34 (6-10 Years)	Area 0.17Ha
		Hierarchy District Centre		
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Rectangular shaped site located in the southern part of Sholden fronting the A258. The site consists of a playing field with two mobile classrooms. The site is flat and there are four mature trees each located in a corner of the site. There is hedging and wire fencing along the eastern boundary onto the A258. The southern and western boundary consists of wooden fencing. The site is set within a residential area.</p> <p>The main school building is located to the north of the site and is not included within this site.</p>				
<p>Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park</p> <p>The site is within the Urban boundaries but is currently being used as a playing field and is classified as open space on the Dover District Proposals Map. Policy DM25 would therefore apply. If the school is retained but the playing fields developed, this may make the school unviable, as the area is also currently used for locating two mobile classrooms. The playing field is currently leased to the school. The Council are currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms. The site should be retained until these standards can be used.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
The site is located within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment				
There are no Listed Buildings within or adjacent to the site. The nearest (St Nicholas Church and Sholden Hall) are approximately 0.14 km to the south east of the site and across the A258.				
PPS5 also includes the protection of heritage assets which may not be designated. The school building may be considered as such due to the unique character of the building and its relationship with Sholden. Development would have a detrimental impact on this building.				
Landscape Impact				
The site is located within an urban area so the wider landscape impact would be minimal.				
Biodiversity				
There would be the normal range of urban species which could be accommodated in any new development. The site appears to be of low habitat suitability for bats. Biodiversity would not, therefore, constrain this site.				
EIA Screening: No			Appropriate Assessment: Below threshold for in-combination screening	
Green Infrastructure				

<p>There is limited PRow availability and the site itself does not lend itself for increasing wider provision of GI. The current use does not qualify as GI. Development possibilities may be considered to be GI neutral.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site No objections to 5 no. dwellings being erected on this site either with direct frontage access or a single point of access (private drive) serving all five properties.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk The nearest bus stop (for bus route 13 to Deal / Sandwich and Canterbury) and the school (if retained) are both adjacent to the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis The site is located within the sequentially preferable Flood Zone 1, the Urban Boundaries and is adjacent to public transport and a school. The site is, however, designated as protected open space and development would be contrary to Policy DM25.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code PHS011	Address Sholden Downs Nursery	Parish Deal Town & part in Sholden Hierarchy District Centre	Overall SHLAA Score 38.5 (0-5 Years)	Area 19.6Ha Indicative No. of units @ 30 dph = 360
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Large rectangular site located to the south west of Sholden, currently in agricultural use. The site falls gently to the south west.</p> <p>There are residential properties along the north eastern and south eastern boundaries of the site. There are open fields to the north western and south western boundaries. Land to the north west has also been suggested for development (PHS014).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The north eastern and south eastern boundaries are adjacent to the Urban boundaries.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are two Listed Buildings adjacent to the site and two near to the site. The two properties adjacent to the site are 110 & 112 Mongeham Road at the southern corner. The two close to the site are Sholden Hall (approximately 80m away) and St Nicholas Church (approximately 168m), both close to the eastern corner of the site. Mongeham Road Conservation Area is located south of the southern corner of the site.</p> <p>Development at this scale would have a detrimental impact on the two Listed Buildings adjacent to the site, if development went up to the boundary line. The size of the site, however, would provide opportunities for mitigation.</p> <p>Landscape Impact</p> <p>The site is located on the brow of a hill and is completely open with long distance views as far as Ringwold, West Studdal and Betteshanger. It is difficult to imagine how this site could be developed without major adverse landscape impact.</p>				
<p>Biodiversity</p> <p>The western boundary lies close to the Thanet Coast Ramsar site and SSSI. The site is arable with limited biodiversity interest (possibly farmland birds such as sky larks). On-site biodiversity is unlikely to be a constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha			Appropriate Assessment: direct on Thanet Coast Ramsar site and wider in-combination.	
Green Infrastructure				

<p>Boundaries well-served with PRoW, but these increase access to Ramsar site. There is a ditch to the SW. The direction of run-off along this ditch is unknown, but is likely to feed into the North Stream/South Stream complex, draining the Ramsar site. Development with SUDS upslope of this would increase flows and housing would lead to an increased risk of pollution. The current GI role of recreation, landscape and water management would be damaged by development.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site is currently served by a track off London Road (A258). The SHLAA included sites DEA 29 & 30, both of which have direct access onto Mongeham Road. If these sites are excluded, there is no direct access from this site other than track, which runs between a residential property (Aspen Lodge) and Sholden C of E Primary School. It would be unlikely that the crossroads configuration with The Street opposite would be problematic, as very few cross movements would occur. The track, however, is not suitable to serve any additional dwellings without being brought up to an adoptable standard but this is highly unlikely due to the constraints of the existing neighbouring properties.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is within five minutes of the bus stop on the A258 (Route 13, hourly to Deal/Sandwich and Canterbury), Sholden C of E Primary School and Deal/Mongeham County Primary School. The size of the site also means that the south eastern corner is close to the local facilities in Great Mongeham.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>Although the site does not have any physical constraints and scores well for access to local services, development of the site would have a detrimental impact on the wider landscape and the Green Infrastructure network. Access onto the site is also poor and not suitable for the envisaged amount of development.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code DEA29 & DEA30	Address Land to the rear of, and including, 126 Mongeham Road, Deal (Stalco Engineering)	Parish Great Mongeham	Initial SHLAA Score	Area 1.2Ha
		Hierarchy District Centre	33.5 6 – 10 years	Indicative No. of units @ 30 dph = 36
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Irregular shaped site located on the south western corner of Deal, where the town meets Great Mongeham. The site appears to have multiple uses. Land fronting Mongeham Road consists of a residential property (a bungalow) with a long front garden. The land to the rear of this property appears to be split into three. The area immediately behind (to the north west) the building appears to be used as a garden. Land beyond this (further north westwards) is scrub and appears to be used for parking vehicles associated with the industrial works/open yard, which is situated in the third area, which runs the length of the other two areas (to the north of the overall site) and has an access from the garage.</p> <p>The adjacent uses consist of car sales / garage (to the south), residential (new development to the south east) open fields (to the east/north east, consisting of site PHS011 and west) and scrub and residential (to the south west). The site lies lower than the agricultural land to the north. To the west of the bungalow is a pumping station.</p> <p>The boundary line consists of scrub and hedgerow. There is a bank along the north eastern boundary. There are also ditches along the north eastern (KHS maintained) and north western boundaries.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The frontage of the site (including the residential property) is within the urban boundaries. The larger area to the rear is outside the confines.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p> <p>Flood Risk</p> <p>Approximately half the site is within Flood Zone 2 with the very tip of the site being in Flood Zone 3. This increases for the Climate Change predictions with half the site within Flood Zone 3. The site is, however, outside the Maximum Breach area as modelled in SFRA.</p> <p>Historic Environment</p> <p>The Mongeham Conservation Area is situated just south of the site. Any development would have to respect the historical setting of that area. There is a pumping station adjacent to site and an investigation will need to be carried out to establish whether the development of this site would have an impact on the operation of the pumping station and any contamination. The site could not be developed without detriment to the setting of the Conservation Area.</p> <p>Landscape Impact</p> <p>The site lies lower than the adjacent fields to the north. There is good boundary screening consisting of trees and scrub which means that there would be no adverse impact on the wider landscaping if this site were to be developed. Any impact on the surrounding landscape would be very limited and could be overcome at the detailed design stage.</p> <p>Biodiversity</p>				

<p>There may be some interest in the boundary features including the ditches and possibly the southern pasture. Common reptiles are likely to be present. There would not appear to be insurmountable biodiversity issues associated with the site.</p>	
<p>EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha</p>	<p>Appropriate Assessment: both direct and in-combination screening required</p>
<p>Green Infrastructure</p> <p>It is understood that the ditch is maintained by KHS for road drainage. As such it would appear to be a good discharge point for SUDS. A footpath runs along the north eastern side, giving access to the countryside and potential for circular walks and, some 480m away, the Thanet Coast Ramsar site and SSSI. In order to maintain the ambience for current PRoW users, care would be needed at the design stage to ensure the PRoW was 'user-friendly'.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Potential access could be achieved from 126 Mongeham Road (after it was demolished) subject to sight lines.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>There is a bus stop (route 14, an hourly service to Deal and Eastry/Canterbury) adjacent to the site and Hornbeam County Primary School is within ten minutes walk away. There is a car garage (South Court Garage adjacent to site) and a PH within walking distance of the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is in a location that would not have a detrimental impact on the wider landscape and which is accessible to a range of local facilities. There are also no overriding ecological issues and a suitable access would appear to be achievable.</p> <p>The site, however, falls within Flood Zone 2 so alternative sites within Flood Zone 1 would have to be considered in the first instance.</p> <p>Development could, however, have a detrimental impact on the Mongeham Conservation Area and this would have to be mitigated.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Flood Risk Conservation Area</p>	
<p>Yes</p>	

Site Code DEA033	Address Land off St Edmunds Road	Parish Great Mongeham	Overall SHLAA Score Considered as part of PHS012	Area 2.15 Ha Indicative No. of units @ 30 dph = 14 (restricted)
Current Use SHLAA Score:--				
<p>Description of Site</p> <p>Rectangular shaped site located on the western most corner of Deal, where Deal and Great Mongeham meet. The site appears to be used for grazing and rises gently to the north.</p> <p>The site is set in the north western corner of a larger area (PHS012) consisting of agricultural land but has been delineated by hedgerows along the sites southern and eastern boundary. This site was originally identified through the early site selection process when PHS012 was being considered.</p> <p>To the north, north west and north east of the site lies existing residential development. Adjacent to the site on the south west are paddocks. To the east and further south west, beyond the paddocks, there are the aforementioned agricultural fields.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is outside of the urban boundaries but the north eastern and north western (part) boundaries abut it.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>The nearest Listed Buildings are located approximately 100m away to the north along Mongeham Road (110 & 112) and approximately 120m to the south west (181 and 182 Mongeham Road). The site, however, abuts the Mongeham Road Conservation Area, which lies to the west. This has been designated to reflect the rural character of this area. Development of this site would have a detrimental affect on the setting of the Conservation Area as it would introduce new urban form on effectively backland development. This could create the coalescence of the urban form of Deal along St Richards Road / St Edmunds Road area and Great Mongeham. It is unlikely that any form of mitigation would prevent this.</p> <p>Furthermore, the combined affect of this site and development at DEA029 & DEA030 would intensify the detrimental impact on the character of the Conservation Area.</p> <p>Landscape Impact</p> <p>Landscape impact very much restricted due to topography, surrounding properties and screening hedgerows. The presence of the hedgerows cannot be taken as assurance of low landscape impact, but there would, nevertheless be a backdrop of development when seen from the south. Any new development may well be able to improve this outlook through sympathetic design and substantial landscaping.</p> <p>Biodiversity</p> <p>Horse pastures and hedgerows may have some limited habitat value. Biodiversity is not considered a constraint here.</p>				

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for in-combination
<p>Green Infrastructure</p> <p>The site is partly bound and crossed by PRow, forming part of a complex of intersecting paths in the area, used for dog walking. Development could reduce the ambience of these paths and their functionality. The site is not particularly amenable for SUDS.</p>	
<p>Proximity to Road Network SHLAA Score: --</p> <p>There is only one possible means of access from St Edmund's Road. By using this access the total number of dwellings would be limited to 50 units, including existing properties. As there are 36 existing properties, development would be limited to 14 new units. Access from Mongeham Road would not be possible due to poor sight lines.</p>	
<p>Access to Services SHLAA Score: --</p> <p>The site is within five minutes walk from the nearest bus stops, along St Richards Road (routes 14 and 82, both hourly) and Mongeham Road (route 14). The site is within ten minutes walk from the Deal and Hornbeam Primary School, to the north, and the new Doctors surgery, along St Richards Road to the south east. There is a pub, garage and local store within five minutes walk of the site.</p>	
<p>Market Attractiveness SHLAA Score:--</p>	
<p>Ownership SHLAA Score: --</p>	
<p>Analysis</p> <p>The site was considered suitable for development at the Preferred Options stage. The site was originally considered suitable due to the low landscape impact and there was a suitable access, although this was restricted to 14 units. It was considered at that time that it would be possible to provide mitigation to reduce the detrimental impact on the Conservation Area.</p> <p>Since that assessment, the Council has received additional sites in Deal that could provide alternative sites at higher capacity, without detriment to the surrounding area. From further investigation it is now considered that development at this site would still have a detrimental impact on the Conservation Area, despite mitigation, and that this impact could not be justified for just 14 units when there are alternative sites that can now be considered.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code PHS012	Address Land north of Ellens Road	Parish Deal Town	Overall SHLAA Score 30.5 (11-15 Years)	Area 15 Ha Indicative No. of units @ 30 dph = 450
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located on the south western edge of Deal. The site gently dips down from Ellens Road (to the south west) but then rises mid way to the properties along St Edmonds Road/St Richards Road/St Frances Close to the north east. Ellens Road is a narrow country lane with passing places.</p> <p>There are two paddocks located in the north west corner of the site, one of which has been considered separately (DEA33). The remaining site consists of agricultural land.</p> <p>The surrounding uses consist of high density residential to the north east, lower density 'rural' to the north west (Great Mongeham) and agricultural fields to the south east and south east (the latter being PHS15). The boundary line consists of scrub, trees and hedgerows. There are two PROW crossing the agricultural land.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The north eastern and a small part of the north western boundary abut the confine.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>The site abuts the Mongeham Road Conservation Area, which lies to the west. This has been designated to reflect the rural character of this area. Development of this site would have a detrimental affect on the setting of the Conservation Area as it would introduce new urban form at the large scale to the east. This could create the coalescence of the urban form of Deal along St Richards Road / St Edmonds Road area and Great Mongeham.</p> <p>The nearest Listed Building is 181 Mongeham Road which is adjacent to the south western boundary of the site. Approximately 120m to the north of the site there are two more Listed Buildings (110 & 112 Mongeham Road). It is unlikely that the setting of 110 & 112 Mongeham Road would be affected due to existing development between the site and historic buildings. Development would have an adverse impact on 181 Mongeham Road.</p> <p>Properties in St Edmund's Road and St Francis Road, to the north of the site, do appear to be rather harsh in their appearance when viewed from the countryside, so any new development may well be able to improve this outlook.</p> <p>Landscape Impact</p>				

The site comprises of a large arable field with two horse pastures to the north. Hedging and trees render the pastures visible only from the north whilst the main field is characterised by a central dip running between ridges along Ellen's Road (to the South) and the St Richard's Road/St Edmund's Road/St Francis Close area to the north of the site. Only the north and north eastern parts of the site could be developed without a harmful impact on the wider landscape.

Biodiversity

The current use is for arable cropping with low biodiversity site and as it is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities, biodiversity issues are not a constraint.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for in-combination
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Green Infrastructure

The site is criss-crossed by PROW, not all of which are maintained (Google Earth 2007, accessed may 2011). It is expected users are mainly local, probably for dog walking. The topography of the site would lend itself to a challenging application of SUDS (due to the topography) with the potential for informal recreation at the meeting point of the paths.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There is only one possible means of access from St Edmund's Road but there could be a possible emergency access from St Francis Close running through parking area (although central strip would have to be adopted and brought up to highway standards). By using this access the total number of dwellings would be limited to 50 units, including existing properties. As there are 36 existing properties, development would be limited to 14 new units. Access from Mongeham Road would not be possible due to poor sight lines. It is the intention that this access would be used to serve DEA33.

The junction spacing will preclude the creation of a new access road off St Richards Road opposite Wilson Avenue. If just the horse pastures were developed (DEA33) this would not require any improvements to the junction of St Richards Road/Mongeham Road.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is within five minutes walk from the nearest bus stops, along St Richards Road (routes 14 and 82, both hourly) and Mongeham Road (route 14). The site is within ten minutes walk from the Deal and Hornbeam Primary School, to the north, and the new Doctors surgery, along St Richards Road to the south east. There is a pub, garage and local store within five minutes walk of the site.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

Although the site is located close to some local facilities, development of the whole site would have a detrimental impact on the wider landscape and on the Heritage Assets (Conservation Area and Listed Buildings). Access for a development of this envisaged scale would also not be achievable.

Consideration for inclusion in the Submission Document?

No

See DEA033 above.

Site Code DEA03	Address Land behind 273 St Richards Road	Parish Deal	Overall SHLAA Score Site too small to be scored. Larger area scored as part of PHS015	Area 0.07 Ha
		Hierarchy District Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Small rectangular site, consisting of scrub, located south of 273 St Richards Road on the south western edge of Deal. The land is located on the crest of the hill and falls gently to the south west. The access has not been identified but appears to be from a track between 261 and 273 St Richards Road (this also serves as a vehicle access for No. 273).</p> <p>The neighbouring uses consist of residential to the north, north east and south east and agricultural land to the south, south west and north west. Directly adjacent to the north western part of the site, the land has been used for storage and consists of a couple of sheds. A Doctor's surgery has been constructed on land to the south east of the site, which was a significant land take.</p> <p>A hedgerow runs along the south western edge of the site.</p>				
Policy Alignment SHLAA Score: --				
The site is outside of the Urban boundaries but the north eastern edge abuts this designation.				
Physical Constraints SHLAA Score: --				
Flood Risk				
The site falls within Flood Zone 1, which would be appropriate for residential development				
Historic Environment				
The site is not within or adjacent to a Conservation Area and there are no Listed Buildings within or adjacent to the site. Development would, however, introduce development to the rear of the existing properties along St Richards Road which would be projecting into the countryside. This would, therefore, introduce 'backland' development.				
Landscape Impact				
The site is located on the crest of a hill and is highly visible from the south west. The Doctors surgery was allowed on appeal and meets an identified social need in the town. The construction of two dwellings would have a detrimental impact on the wider landscape and the setting of this highly visible part of Deal but would only have a limited contribution to the overall housing figures. The building of approximately two dwellings does not, therefore, override the detrimental impact on the landscape.				
Biodiversity				
The site appears as dense scrub and, as such, has limited biodiversity value. Biodiversity would not be a constraint to development.				
EIA Screening: Not required			Appropriate Assessment: Not required	
Green Infrastructure				
The site has no PRow nearby and the usefulness for biodiversity is limited due to its 'island' nature. Local GI is not a determinant for this site.				

Proximity to Road Network SHLAA Score: --	
The private drive currently only appears to serve only two properties. There would be no objections to it serving a further two. Junction spacing with Wilson Avenue is not an issue.	
Access to Services SHLAA Score: --	
The site is within five minutes walk of a bus stop (adjacent to the track) and the new Doctors surgery. The site is also five minutes walk from open space/playing fields and a bowling club. The site is within ten minutes walk from St Mary's Catholic Primary School and local store along St Richard's Road.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site is too small to be allocated in the Site Allocations DPD. Amending the confines, however, would enable development of the site. The site is located close to public transport links, and the new Doctors surgery as well as a local primary school. Development of the site, however, would have a detrimental impact on the wider landscape and would only provide a limited amount of housing. Retain current confines.	
Consideration for inclusion in the Submission Document?	No

Site Code PHS015	Address Land to the north east of Ellens Road, straddling Alexandra Drive	Parish Deal Town	Overall SHLAA Score 24.5 (Undeliverable)	Area 40.3Ha Indicative No. of units @ 30 dph = 1209
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>Large irregular shaped site, consisting of agricultural land, located on the south western edge of Deal. The land is on a hill and rises to the north east where the site adjoins properties along St Richards Road. It appears that this land was sold as 'champagne plots' (a larger area divided up into smaller plots to be sold for development) in the past, which has led to multiple owners. To the south west, along the valley where Ellens Road runs, there is sporadic development.</p> <p>To the south east and north west there is agricultural land, which has also been suggested for development (SHL076 and PHS012 respectively). The boundary treatment with development includes a range of hedgerow scrub and trees. On land to the south west, on the opposite site of Ellens Road, there are further agricultural fields. Ellens Road is a narrow country lane with passing places.</p> <p>The site area also includes DEA03 and SAD31.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is outside of the Urban boundaries, only the north eastern boundary abuts the line of the confine.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>No specific built areas of visual importance but overall impact on landscape would need to be considered, please see below.</p> <p>Landscape Impact</p> <p>This site is on open hillside lying between sporadic historical development along Ellen's Road to the south and small scale development behind St Richard's Road. In landscape terms this area is very sensitive so even small scale development would transform the visual appearance from countryside to urban. If development were to be allowed, then there would be pressure to develop neighbouring sites which would have an adverse impact on the whole landscape character of this approach to Deal.</p> <p>There is, however, one area of the site in the eastern most point that could be developed. This is land identified as SAD31 (please see separate form) and a smaller rectangular site lying adjacent to it.</p> <p>Biodiversity</p> <p>The site is arable and will have only slight biodiversity interest; it is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities. Biodiversity would not be a constraint on development.</p>				

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening required, alone due to potential housing number, and in-combination.
<p>Green Infrastructure</p> <p>No PRoWs abut or cross this site; the topography could provide some challenging SUDS solutions (due to topography) with accompanying recreational opportunities and habitat creation.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Ellen’s Road would not be suitable for a development of this size, due to the width of the road, sight lines and restricted width at the railway bridge. Access may be possible from St Richard’s Road via a number of gaps between existing residential properties. Visibility would, however, be a problem as these are fairly narrow and each access could only serve a maximum of 50 dwellings. The smaller area to the east (see SAD31) would be acceptable.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site covers a large area and is, therefore, within five minutes walk from the local facilities provided along St Richards Road (bus routes 14 and 82 (hourly) the new Doctors surgery, St Mary’s Catholic Primary School, local store and open space/playing fields, bowling club).</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 1.0 – Multiple over 10 hectare</p>	
<p>Analysis</p> <p>Development of the whole area would have a detrimental impact on landscape and could set a precedent for further development in neighbouring plots. Furthermore, access to the site could be limited and Ellen’s Road would not be suitable for development at this scale.</p> <p>There is only a small area in the eastern most corner with development potential but this would have to come forward with the adjacent site SAD31.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>Part</p>

Site Code DEA35	Address Trystar, Ellens Road, Deal	Parish Deal	Overall SHLAA Score 32 (6-10 Years)	Area 0.56 Ha Indicative No. of units @ 30 dph =16
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Rectangular shaped site off Ellens Road, located to the south west of Deal. The site rises gently to the north east. The site consists of a residential property (Trystar) and a depot to the rear (north east), undeveloped land/garden in the middle and a pumping station at the front of the site (south west). The pumping station has been fenced off and new trees/hedging has been planted to enclose it. The site is open to the front but there are a number of mature trees to the rear around the house and depot.</p> <p>The surrounding uses consist of low density residential, paddocks and agricultural land. Those that are fronting Ellens Road are open. Uses to the rear are screened by mature trees. There is a kennels further to the south east.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site does not abut the urban boundaries.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas, within or near to the site.</p> <p>Landscape Impact</p> <p>Tristar is sited at the bottom of the slope down from St Richard's Road, amongst a loose arrangement of dwellings and small commercial activities, mainly on sizeable plots, scattered along Ellens Road. Development which would increase the housing density here would appear to contrast with the surrounds and result in adverse landscape impact.</p> <p>Biodiversity</p> <p>There are likely to be common reptiles on the site, but these are not a constraint to development</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: in-combination screening required.		
<p>Green Infrastructure</p> <p>There are no PRoW which the site could link to and so provide increased recreational opportunities. The site could be suitable for SUDS, but this would have limited application, particularly given the 'island' nature of the site. Overall, the site offers no GI gain.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Ellens Road is a single track rural lane with passing places. There is no footway or street lighting on either side of the road and there is no bus route along this road. The road is also national speed limit. The site is therefore not suitable for residential development.</p>				

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is adjacent to Flodden Road, which is little more than a track (it does not appear to be a public footway). This track leads to St Richards Road just within the built up edge of Deal, where there are two bus services (routes 14 and 82) and a new Doctors surgery. St Mary’s Catholic Primary School, a local store and open space/playing fields and bowling club are located a little further away.	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Although the site is located close to local services, the access (Flodden Road) to them is currently poor. The site is also divorced from the main urban area and is within a rural area in highly visible location. Any development would, therefore, be out of character with the rural setting and would have a detrimental impact on the wider landscape. The wider road network is also not suitable for further development.	
Consideration for inclusion in the Submission Document?	No

Site Code SAD31	Address Land to the rear of 133 -147 St Richards Road (147 to be used as the access)	Parish Deal Town	Initial SHLAA Score 31.5	Area 0.75 Ha
		Hierarchy District Centre	11-15 Years	Indicative No. of units @ 30 dph = 22
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Roughly rectangular shaped site located on the south western edge of Deal. The site consists of agricultural land and is located on the top of a plateau which falls gently to the south west.</p> <p>To the north east and south east of the site there are residential properties. Further along the south eastern boundary there is also a small industrial area (Marlborough Road). There appears to be no specific south western boundary as the fields continue. To the north west there is a paddock enclosed by wire fencing. This is quite open. Beyond this there are the playing fields of St Mary's Catholic Primary School, which has mature trees around the boundary. This provides some screening to the site.</p> <p>147 St Richards Road is within the same ownership. Site has been suggested for residential and/or care homes for the elderly.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The proposed access is within the Urban Boundary. The north eastern and south eastern boundary abuts the Urban Boundaries.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site.</p>				
<p>Landscape Impact</p> <p>The site is near the ridge crest but contained by the tree line of the school grounds towards the NW, and housing to the NE and SE. With sensitive boundary treatment and care in roofscape, development could blend with the existing. Subject to such detail, there is no landscape constraint.</p>				
<p>Biodiversity</p> <p>Land is indicated as being arable. There may be a small biodiversity interest on the built-up margins (common reptiles) but there is no constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: screening for in-combination		
<p>Green Infrastructure</p> <p>The site is neutral in respect of GI, without any adverse impact, or much opportunity to contribute, due to its isolated location.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct</p>				

access to site	
<p>It has been suggested that access could be through No. 147 St Richards Road. If the property was to be demolished, a suitable access onto St Richards Road for up to 22 units could be established. This access could accommodate up to 50 units.</p> <p>Marlborough Road, to the south east, would also be suitable but, as this road already serves 28 properties, the new development would be limited to 22 units. If further units were to be suggested (as a result of a higher density or including the neighbouring land (PHS15)) as part of a scheme, a secondary access would still need to be identified.</p>	
Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school	
<p>The site is adjacent to St. Mary's RC Primary School and bus stops for routes 14 and 82. The new Doctors surgery, local store and open space/playing fields are within five minutes walk of the site. The site is also adjacent to a small employment site.</p>	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
<p>The site is in a good location for access to local services and there are no historical or physical constraints on the site. Subject to sensitive boundary treatment and the design of the proposed development, the impact on the wider landscape would be minimal. Access should also be suitable for up to 50 units. Land adjacent (the paddocks to the west) would also be suitable for developed and should be considered as an addition to this site (see form for PHS15).</p>	
Consideration for inclusion in the Submission Document?	Yes
<p>Boundary Treatment Design, in particular the roofscape</p>	

Site Code SHL076	Address Land behind St Richard's Road, Cross Road, Lyida Road and Sydney Road.	Parish Deal Town	Overall SHLAA Score 26.5	Area 14.82 Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 444
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large irregular shaped site located on the south eastern edge of Deal (close to the Deal/Walmer boundary) between Ellens Road and the rear of the residential properties along St Richard's Road. The site rises gently from Ellen's Road in the south east to the aforementioned properties. The site is cut in two by a rural lane, Cross Road, which crosses the site from north to south. The site is currently used for agriculture.</p> <p>Residential development adjoins the site to the east and north, to the west and south there is agricultural land. Abutting the western corner of the site is a breakers yard, which is contained within hedges/trees.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site abuts the Urban Boundary along the eastern and northern edge reflecting where current residential development lies.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p>				
<p>Historic Environment</p> <p>No specific built areas of visual importance but overall impact on landscape would need to be considered.</p>				
<p>Landscape Impact</p> <p>This site is particularly visible from Coldharbour Road and from the A258 at the entrance to Upper Walmer. As the land rises to the north, any development would be fully exposed and would have a detrimental visual impact on the landscape. A smaller area would not be acceptable, due to topography, development on which would result in an appearance of overdevelopment on the town edge.</p>				
<p>Biodiversity</p> <p>The site is arable farmland with limited biodiversity; the site is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities. Limited biodiversity enhancement might result from development. Biodiversity is not a constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: In-combination screening would be necessary		
<p>Green Infrastructure</p> <p>There are no PRoW in the vicinity, which limits connectivity. The location of the site lends itself to SUDS, although extreme event flooding of Ellens Road would need to be guarded against. The site is</p>				

of a size that would require some internal GI. Overall, however, the site would be GI neutral.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access from both Ellen’s Road, to the south, and Cross Road, to the north, is impractical (both roads are single lane country roads) and would not support the envisaged number of dwellings.

If the part of the site to the east of Cross Road was to be considered there may be potential on the widening of the narrow section of Cross Road and continuation of the footway to the development site frontage, which could then incorporate an access point to serve the development.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is within five to ten minutes walk of the railway station and bus stops for routes 13, 15 and 15a along Station Road/Court Road. The new Doctors surgery and St Mary’s Catholic Primary School, both situated on St Richards Road (to the north west of the site), are approximately 10 minutes walk away. There are two further bus routes (routes 14 and 82) which also travel along St Richards Road. Walmer Science College, along Salisbury Road (to the east), is also approximately ten minutes walk away.

There is a local shop at the junction of Cross Road, St Richards Road and Mill Hill. This is approximately five to ten minutes walk away.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is located reasonably close to local facilities and there would be no detrimental impacts to local biodiversity or historic assets. There may also be a possibility that road improvements (widening and footpaths) to Cross Road could be made as part of a smaller development.

The wider road network would not, however, be suitable if the whole site was to be developed. Development of the whole, or even part of the, site would also have a detrimental impact on landscape and could set a precedent for further development in neighbouring plots. These issues would outweigh any of the positive aspects outlined above.

Consideration for inclusion in the Submission Document?

No

Site Code NS05DEA	Address Land at St Richard's Road, Deal	Parish Deal Town	Overall SHLAA Score 29.5 +15 years	Area 1.13Ha Indicative No. of units @ 30 dph = 33
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Flat, rectangular, site located in a predominantly residential area, close to the south western edge of Deal. The site is currently used as public playing pitches. The site is enclosed by residential development along the north eastern, south eastern and south western boundaries. There is no specific boundary treatment around the site as it consists of a mixture of trees/scrub or fencing. The playing pitch forms part of a larger open area to the north west. There is no identifiable boundary line along the north western side of the site.</p> <p>There is only one possible access to the south west onto St Richard's Road. This access is currently used as a small parking area associated with the open space.</p>				
<p>Policy Alignment SHLAA Score: 2.0 - Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park</p> <p>The site has been designated as protected open space on the Dover District Proposals Map, Policy DM25 would, therefore, apply.</p>				
<p>Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas near to the site. The site is, however, located on the Mill Hill ridge, an area that is exceptionally rich in archaeological remains. This ridge acted as a focus of prehistoric, Iron Age, Roman and Anglo-Saxon settlements and burial. Pre-determination evaluation would be necessary to determine where development is possible within the site.</p> <p>Landscape Impact</p> <p>Although the site is on a crest of a hill, the landscape impact would be minimal as the site is surrounded by residential properties.</p> <p>Biodiversity</p> <p>Mainly playing field with some rough grassland to NE. There may be some minor biodiversity interest; probably common reptiles but nothing to constrain development.</p>				
<p>EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha Appropriate Assessment: screening for in-combination</p>				
<p>Green Infrastructure</p> <p>Loss of part of the GI Network, contrary to CS Policy CP7.</p> <p>The first criterion of DM25 considers whether there is any deficiency in the provision of such formal playing pitches in the Ward. There are over ten clubs using the pitches and fields for football and cricket and the site is considered to be the prime sporting location in Deal due to the quality of the pitches and facilities there.</p>				

The new open space standard for natural grass playing pitches for the Dover District has shown that there is currently capacity in football and cricket, however in 10 years time as a result of population growth, there will be a lack of capacity in these sports and therefore provision of pitches will be required.

Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site

This site fronts a parking area off St Richard's Road. The parking area and access road is within the same ownership.

Its junction with St Richard's Road is substandard in terms of supporting the envisaged number of dwellings by way of narrow road width and poor footway access. The road width could not be improved given the different ownerships of the neighbouring properties. St Richard's Road is subject to a 30mph speed limit.

A suitable route may be established through Leivers Road to the south east with an emergency exit off St Richards Road. Leivers Road would have to be improved and parking reconsidered.

Access to Services SHLAA Score: 4.5 - Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site lies in a position close to two bus routes along St Richard's Road (14 and 82 to Deal town centre, Sandwich and Canterbury) and a new Doctor's surgery. St Mary's RC Primary School is also within five minutes walk from the site. Another school, Deal and Mongeham County Primary School, is more than ten minutes walk away.

Market Attractiveness SHLAA Score: 3.0 – Multiple up to 1 hectare

Ownership SHLAA Score: 5.0 - Single Public Sector Ownership

Analysis

The site is located in an area with a good access to services and if developed, would have little impact on the wider landscape or the historic environment. The site, however, would result in the loss of formal open space and GI (which would be contrary to Council policy), which would not be suitable for the size of development and which could not be improved.

The site could not, therefore, be considered for inclusion in the Submission Document.

Consideration for inclusion in the Submission Document?

No

Site Code NS06DEA	Address Land at Cowdray Square, Deal	Parish Deal Town	Overall SHLAA Score 29.5	Area 0.80ha
		Hierarchy District Centre	+ 15 Years	Indicative No. of units @ 30 dph = 24
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Irregular shaped site consisting of formal (football pitch) and informal open space and a play area. The land is on top of the crest of a hill so that the topography falls gently to the north east.</p> <p>The site boundary consists of a mix of scrub, trees and fencing. The site is surrounded on all but one side by residential development. Beyond the south eastern boundary there is a housing development consisting of 14 dwellings (DOV/07/1005), which is under construction. The line of trees along this boundary is now under the management of this development.</p>				
<p>Policy Alignment SHLAA Score: 2.0 - Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park</p> <p>The site falls within the settlement confine but the site has been identified as protected open space on the Dover District Proposals Map, Policy DM25 would therefore apply. The Council are currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms. The site should be retained until these standards can be used</p> <p>In order to gain access to the site the play space would have to be moved. It would be possible to resite the Cowdray Square play area within the larger site, so long as this didn't cause a deficiency in playing pitches, the new location is equally accessible and the quality of design meets Play England/Fields in Trust guidance.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas near to this site.</p>				
<p>Landscape Impact</p> <p>As the site is located within an urban area there would be minimal landscape impact. The site is on a crest of a hill, which falls gently to the north east. Any impact from an increased density of roofscape will be limited.</p>				
<p>Biodiversity</p> <p>Amenity grassland, the site will have very limited biodiversity value – possible common reptiles which are not a constraint to development. There are trees on the eastern boundary but they have been transferred into another ownership.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha			Appropriate Assessment: screening for in-combination	
<p>Green Infrastructure</p> <p>As this is open space and forms part of the current GI network, Core Strategy Policy CP7 applies.</p>				
Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct				

access to site	
<p>This site fronts Cowdray Square. Cowdray Square is narrow with parking on both sides but access would be achievable in the location where the site abuts the public highway (the play area would have to be relocated). There are reasonable pedestrian links to other parts of the residential estate from the site. The site is within walking distance to local amenities and good bus routes. Roads in the area are subject to a 30mph speed limit.</p> <p>There are no overriding reasons, from a highways perspective, why development should not proceed.</p>	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
<p>The site is located within five minutes walk away from two bus routes, one every half an hour along St Richards Road/Mill Hill (15/15A), the other hourly along Telegraph Road (13). The site is also near to the new Doctor's surgery along St Richards Road. St Mary's RC Primary School, Deal Castle School, The Downs CE Primary School & Walmer Secondary School all within vicinity.</p> <p>The Deal and Welfare Social Club is located in Cowdray Square and there are local shops along Cowdray Road. There are also public houses located along Mill Hill.</p>	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 5.0 - Single Public Sector Ownership	
Analysis	
<p>The site is located close to local services, there would be no landscape impact and a suitable access could be achieved. The site would, however, be contrary to both Policies DM25 and CP7, as open space and Green Infrastructure would be lost.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code DEA11	Address 30 Mill Hill	Parish Deal Town	Overall SHLAA Score Not scored, too small	Area 0.09 Ha Indicative No. of units @ 30 dph = 2
Current Use SHLAA Score: --				
Description of Site Flat rectangular site consisting of a large single retail building locate within a predominantly residential area. There are retail units to the west of the site. The site is almost devoid of any vegetation, the exception being a tree on the south western boundary.				
Policy Alignment SHLAA Score: -- The site is within the Urban boundaries				
Physical Constraints SHLAA Score: -- Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development Historic Environment There are no Listed Buildings or Conservation Areas in or close to the site. Landscape Impact Small urban site; no landscape impact. Biodiversity None identified				
EIA Screening: No			Appropriate Assessment: No	
Green Infrastructure Too small to consider, unless incorporated with site LDF010.				
Proximity to Road Network SHLAA Score: -- The site is adjacent to two roads. The frontage is currently used as a parking area.				
Access to Services SHLAA Score: -- The site is on a bus route and is adjacent to local shops. The local school is five minutes walk away.				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis The site is located in an urban location close to local services. Subject to highways, the site would be suitable for development. The site is, however, too small to be allocated in the DPD. Could come forward as a planning application.				
Consideration for inclusion in the Submission Document?				No

Site Code NS01DEA	Address Former South Deal County Primary School	Parish Deal Town	Overall SHLAA Score 36	Area 0.8Ha
		Hierarchy District Centre	6-10 years	Indicative No. of units @ 30 dph = 24
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>Irregular shaped site formerly used as a school. The site currently consists of the school building (located at the rear of the site along the south eastern boundary), informal (grass) and formal (tarmac) open space to the front and a parking area to the south west of the site. Part of the building has recently been used as day nursery. There is an access fronting Mill Road and a side access which joins a service road to the cemetery. This also leads to Mill Road.</p> <p>There are residential properties, consisting mainly of terrace houses, located to the south west, north west (on the opposite side of the road) and north east of the site. Deal cemetery is located to the south east of the site. There are mature trees located within the cemetery along the boundary with the school.</p> <p>The north western boundary fronts Mill Road and consists of railings with a dense tree line immediately behind. The level drops approximately a metre within a short distance from the public footway/railings and then levels out. The north eastern and south eastern boundaries consist of a brick walls. There is a hedge along the south western boundary separating the parking area from the school.</p>				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park				
<p>The site falls within the urban boundaries but the informal grassed areas to the front have been identified as protected open space on the Dover District Proposals Map. Policy DM25, Open Space, would apply.</p> <p>Previous work, which has been undertaken as part of pre-application advice, has, however, indicated that the loss of this open space would not detrimentally affect on the provision of informal open space in the Ward. The Council is, however, currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas that would be affected if this site was to be developed. Development of this site would be acceptable if it is integrated with the existing urban grain, which consists of frontage development.</p> <p>Landscape Impact</p> <p>The site is located within the town so the wider landscape would not be affected by development. The street scene, however, could be changed with the removal of the trees along the Mill Road. The impact of any development on the street scene would not be great as the line of protected trees would act as a screen.</p> <p>Biodiversity</p>				

<p>The trees on the site have Tree Preservation Orders. Common reptiles may be present (not an overriding development constraint), and the proximity of the cemetery and associated green spaces indicate that bat surveys may be required prior to any demolition, but aside from that, there is no constraint to redevelopment.</p>	
<p>EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha</p>	<p>Appropriate Assessment: screening for in-combination</p>
<p>Green Infrastructure</p> <p>Weak in respect of biodiversity due to the past use as a school; open spaces nearby but these may not qualify as GI. Would not form part of any strategic linkages and so the site is GI neutral. It is unlikely, therefore, that development of the site could provide anything significant to the GI network.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>The site fronts Mill Road, which is within a 30mph speed limit. There is an existing access but this is not currently served by a vehicle crossover. Sight lines in this location would, however, be achievable. Traffic regulation orders exist on development side of carriageway only (single yellow line). The site is on a good bus route and is within walking distance of local amenities. Mill Road has good footways on both sides of its carriageway.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>There is a bus stop, local shop and take-away immediately north of the site. Deal Community College (11-18 years) is also located north east of the site, off Hamilton Road. The Doctor's surgery, located to the east of the site along Canada Road, would take longer than five minutes to walk.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 - Single Public Sector Ownership</p>	
<p>Analysis</p> <p>The site would be suitable for further investigation as the site is located within the urban boundaries of Deal, which has a wide range of facilities and services, some of which are close to the site. Development would also have limited impact on the surrounding area and access would be achievable. This would still be subject to the provision of open space in the area. The trees to the front of the site would, however, have to be retained (TPO's) to maintain the character of the existing street scene.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Open space provision Bat survey</p>	
<p>Yes</p>	

Site Code DEA10	Address Land adjacent to Castle Community College and to the rear of Tides Leisure Centre	Parish Deal Town	Overall SHLAA Score 27	Area 0.94Ha
		Hierarchy District Centre	Undeliverable	Indicative No. of units @ 30 dph = 28
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Triangular shaped site with long narrow strips to the north and south, located centrally within the urban area of Deal. The site is flat and consists of grassed playing fields and areas of tarmac (sports court and a parking area).</p> <p>There are no distinct boundary lines identifying the majority of the site, the only physical boundary being the residential properties (Stockdale Gardens) to the south east of the site.</p> <p>The neighbouring uses consist of the aforementioned residential properties and sports grounds associated with Castle Community College and the sports centre (Victoria Park to the north).</p>				
<p>Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park.</p> <p>The majority of the land is open space (informal and formal) and has been identified as such on the Dover District Proposals Map. Policy DM25 would therefore apply. The Council is, however, currently working on open space and playing pitch standards but these were not available at the time of writing the assessment forms. The site should be retained until these standards can be used</p>				
Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues				
<p>Flood Risk</p> <p>The northern part of the site is within Flood Zone 2. The site is, however, outside the Maximum Breach (actual flood risk) as modelled in the SFRA.</p> <p>Historic Environment</p> <p>There are no Listed Buildings within or adjacent to the site. The South Barracks Conservation Area is approximately 0.2 Ha to the south east of the site.</p> <p>Landscape Impact</p> <p>The site is located within an urban area so longer landscape views would not be detrimentally affected. The site is, however, located within open space. It is assumed that the northern tongue is for an access road and this would introduce a hard element into the playing field margin at Tides. In townscape terms, the site is rather incongruous.</p> <p>Biodiversity</p> <p>The grassland at Tides is poor in biodiversity and it would appear that the College grounds are equally poor. As long as the tree line in the grounds of Victoria Park/Tides was protected, biodiversity would not be a constraint to development.</p>				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: screening for in-combination impacts required		
Green Infrastructure				

This is a curious site in that it is damaging to GI, in terms of direct loss of open space. There is, however, the opportunity to create another linkage from Hamilton Road to Victoria Park, which could mitigate the land loss. The design of the link would need to be such to encourage a pedestrian and cyclist usage. To the east of the site, an isolated area of open space would be left over from severance of what appears to be a pitch/running circuit and early consideration should be given to this to see how it might be used to the benefit of Deal residents.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site.

There are two possibilities for an access, directly onto Hamilton Road or through Stockdale Gardens. The access onto Hamilton road may prove difficult because of the close proximity of the access for the KCC Adult Learning Facility.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school.

The site is adjacent to Castle Community College and is within five minutes walk of bus routes 14 (hourly) 15 (half hourly) and 15a (hourly) which go to Deal, Sandwich, Canterbury and Dover, along Mill Road to the north west, and the Doctors surgery at Canada Road to the south east. There are also local shops located on the corner of Mill Road and Hamilton Road.

In addition, there is a cycle route / footpath along the line of the railway which leads to the railway station/supermarket to the north. This would take approximately between fifteen to twenty minutes to walk.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site is outside the flood risk area (Maximum Breach) and is within walking distance of local facilities. To achieve access a long length of new road would have to be constructed, backing onto the gardens of properties on Stockdale Gardens. Given the shape of the site is triangular, any development may need to be irregular and could result in awkward shaped gardens and odd remaining pieces of land. The main objection to the development of land would be the loss of open space (contrary to Council Policy). For these reasons development is not suitable.

Consideration for inclusion in the Submission Document?

No

Site Code DEA25	Address Land adjacent to railway, Station Road, Walmer	Parish Walmer	Overall SHLAA Score 32.5 (6-10 Years)	Area 0.31Ha Indicative No. of units @ 30 dph = 9
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Thin rectangular site located on the western side of the railway line where Station Road meets Ellens Road. The railway line runs along the eastern boundary where there is also a line of mature trees/hedgerows. A hedgerow also runs along the western boundary, separating the site from the neighbouring stables. To the north, on the opposite side of Station Road, there is residential development. To the south there are agricultural fields.</p> <p>Site was recently developed for holiday lets (DOV/05/00239).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The urban boundaries run along the opposite side of Station Road, to the north of the site.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or close to the site.</p> <p>Landscape Impact</p> <p>The site slopes down in a northerly direction. It is visually discrete with a hedged western boundary (although this could be removed in the long term) and the railway embankment to the east. Impact is likely to be small.</p> <p>Biodiversity</p> <p>Biodiversity will be limited, and more associated with the railway embankment and hedgerow. The embankment could be used for navigation and foraging by bats and a bat survey would be necessary as part of project development. However, this is unlikely to be an excessive constraint on development.</p>				
EIA Screening: No, too small			Appropriate Assessment: No	
<p>Green Infrastructure</p> <p>The main GI component is the railway embankment and the opportunity it offers for species movement. This should be unaffected by development. There are no PRoW adjoining the site, except Station Road. There would be the opportunity for SUDS.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site fronts Station Road. The current access would be suitable for nine dwellings.</p>				
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery				

and school within 10 minutes walk

The site is within five minutes walk of the railway station and bus stops for routes 13, 15 and 15a. Walmer secondary school is approximately ten minutes walk away. There is also a public house within five minutes walk away.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Development of this site would not have a detrimental impact on the wider landscape, it is located close to public transport and local school and would not have a detrimental impact on any historic buildings.

The site has, however, been developed recently for a tourism use.

Consideration for inclusion in the Submission Document?

No

Site Code DEA08 & DEA27	Address Land to the rear of 20 to 64 Mayers Road	Parish Walmer	Initial SHLAA Score 31.5	Area 0.27/0.73 Ha
		Hierarchy District Centre	11-15 Years	Indicative No. of units @ 30 dph = 8/21
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>DEA27 is a rectangular shaped site consisting of allotment gardens and a long strip of scrub land that runs down the line the western boundary. DEA08 only consists of the allotment gardens. Both sites fall within the larger site PHS013 (see below).</p> <p>The sites are accessed by a track along the northern boundary, which leads to Station Road (to the north) and Mayers Road (to the north east). There also appears to be an access to the south of No 60 Mayers Road.</p> <p>To the north and east there are residential properties. To the south there is open farmland. To the west there is a railway line which is raised on an embankment. There is heavy tree cover on this embankment.</p>				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation The northern and eastern boundaries for both sites abut the urban boundary.				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development</p> <p>Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site.</p> <p>Landscape Impact The site is well contained with a railway embankment to the west and existing residential properties to the north and east. There would, therefore, be no impact on the wider landscape.</p> <p>Biodiversity Biodiversity would be limited to common reptiles. This would not be a constraint to development.</p>				
EIA Screening; S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment;		
<p>Green Infrastructure</p> <p>The site includes allotments which forms part of the Green Infrastructure network. Policy CP7 would therefore apply. Development would be contrary to this adopted policy.</p>				
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>The site abuts a track that leads to Station Road and Mayers Road. This track already serves eight properties and would have to be brought up to an adoptable standard if 21 houses were to be developed. This may not be possible, however, given the available space as it is a single width track with properties on either side.</p>				

The track to the south, adjacent to No. 64 Mayers Road appears to be the garden of that property and not suitable as an access. The additional traffic generated from the development could conflict at the Mayers Road/ Station Road/Court Road/Station Drive junction.

It would appear that the access would be a restraint to development in this location.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is a short walk to bus stops on Station Road serving routes 15/15a (half hourly/hourly) to Dover/Deal and route 13 (hourly) to Deal. The site is also located within five minutes walk of Walmer Railway Station. There are local shops located at the junction of Station Road and the A258 (to the east), which is approximately ten minutes walk from the site. Walmer Science College and The Downs CoE Primary School (to the north) are both located approximately ten minutes walk away.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

The two sites are located in a discreet location, within the sequentially preferable Flood Zone 1 and would not have an impact on the wider landscape. The sites are also located close to local facilities and there are no constraints related to heritage assets.

Development of the site would, however, result in the loss of a Green Infrastructure asset, which would be contrary to Council adopted policy, and there are concerns that access to the site for additional development would not be suitable.

Due to these two reasons, the sites are not suitable for inclusion in the Site Allocations Document.

Consideration for inclusion in the Submission Document?

No

Site Code PHS013	Address Land fronting Station Road and to the west of Clifford Park Caravan Park	Parish Walmer	Overall SHLAA Score 35.5 (6-10 Years)	Area 12.6Ha
		Hierarchy District Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located to the south west of Walmer, fronting Station Road (to the north of the site) and which wraps around Mayers Road, a narrow road that runs southwards from Station Road. The site consists of predominantly agricultural land but with some allotments and undeveloped land to the north west of the site (to the west of Mayers Road). The land falls towards Station Road to the north. The land to the north west is within multiple ownership.</p> <p>There is a railway line running down the western boundary and this has a line of mature trees that lead into a small wooded area to the south west. To the south and, beyond the railway line, to the west there are open fields. To the north of the site there are residential properties. To the east are further residential properties and a caravan park. The residential properties along Station Road are, on the whole, 1960s/70s design. Mayers Road consists of a mix of older terraced properties and 1930s flats.</p> <p>Telephone lines and public rights of way cross the site. These would need to be incorporated into any development. The railway line running along the western boundary could have noise implications</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The northern boundary abuts the urban boundary. The area has been identified as an area for potential urban expansion in the adopted Core Strategy.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings within or adjacent to the site. The Upper Walmer Conservation Area is, at its nearest point, 97m away from the site. Development at this location would not have a detrimental impact on the setting of the Conservation Area due to existing development.</p> <p>Landscape Impact</p> <p>The bulk of the site is arable field bounded by a railway line to the west, woodland and scattered trees to the south and a caravan park to the east. To the north there is a mix of tight-built housing and flats along the very narrow Mayers Road, which runs southwards into the site from Station Road which runs across the northern boundary. The land falls towards Station Road in the north.</p> <p>In landscape terms, the area between the existing built up development on Mayers Road and the caravan park would have the minimum visual impact.</p> <p>Viewed from the A258, the southern and western parts of the site are highly visible. Any development here would have high impact on the landscape. Development of these parts of the site would therefore damage the rural-urban transition and should be avoided.</p>				

As the southern part of the site is highly visible from the A258, any development would have to have substantial landscaping to reduce the visual impact.

Biodiversity

The current use limits biodiversity interest to the margins, which could support common reptiles (themselves not a constraint to development). The site is not on geology (soil or rock) that lends itself to particularly specialised habitat opportunities, although landscape buffering could provide some benefits.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha

Appropriate Assessment: screening required for in-combination impacts.

Green Infrastructure

There is an interesting complex of PRow which bound and cross the site, which in a less visible location would lend themselves to masterplanning for a more extensive area with the inclusion of an urban-edge recreational space. However, the site lacks other attributes that could be built upon. SUDS appears feasible. As long as the existing ambience of the PRow are maintained or enhanced, there are no GI constraints.

There are no play areas within the immediate vicinity (600m walking distance from a LEAP or 1km walking distance from a NEAP). Equipped play would need to be provided on this site.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access could be established between 77 and 51 Station Road but this would need to be in conjunction with improvements at the Station Road/A258 junction.

As a rule for safety purposes, if a development only has one access then the number of dwellings would be limited to fifty units. The number could be increased if there is an emergency access or if the road layout was of a loop design. This could involve an initial short access onto Station Road with a 'loop' design to the rest of the development. Development over 100 units would need to include a secondary road/emergency access in addition to the loop design.

This site would be improved if two points of access could be established. If the site were, however, to be constructed with a major access road it could support up to 300 dwellings as a loop road feeding back to a short connection to a single point of access with a secondary emergency access. This would require 1.8m footways and a typically 4.8m - 5.5m carriageway width. Junction visibility will be required at 43m x 2.4m x 43m with an internal target speed of 25mph on the main spine road and 20mph on any internal roads spurring off it. A transport assessment would be required to look at the impact on the wider road network in the vicinity of the site.

The site has poor access from Mayers Road and there would be conflict at the Mayers Road/ Station Road/Court Road/Station Drive junction. There is also poor access to the allotment gardens which form part of the site, west of Mayers Road, as the road is a private, narrow road (also see DEA08 & DEA27). An 'emergency only' access could be established from Mayers Road to the site but this would require with a defined turning head at the southern most tip.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is adjacent to bus stops on Station Road serving routes 15/15a (half hourly/hourly) to Dover/Deal and route13 (hourly) to Deal. The site is also located within five minutes walk of Walmer Railway Station. There are local shops located at the junction of Station Road and the A258 (to the east), which is approximately ten minutes walk from the site. Walmer Science College and The

Downs CoE Primary School (to the north) are both located approximately ten minutes walk away.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The area has been identified for potential urban expansion in the adopted Core Strategy so the fundamental issues for and against development in this location have been debated. It is the amount of development that is now been considered and this would only appear to be limited by landscape impact.

At the time of the Preferred Options, the area for development was limited to the eastern side, between the developed areas of Mayers Road and the Caravan Park. This area was considered to have the least detrimental visual impact on the wider landscape.

The situation in that area has not changed since the initial assessment and it is still considered that viewed from the A258, the southern and western parts of the site are highly visible. Any development here would have high impact on the landscape. Development of these parts of the site would therefore damage the rural-urban transition and should be avoided. To ensure that the visual impact is reduced, any development would have to be in conjunction with structural landscaping across the site to reduce the visual impact and to create a new rural-urban transition.

There has been a request to change the confines on land in the north western corner (behind properties on Station Road and Mayers Road (please see form for DEA08/DEA27)

Consideration for inclusion in the Submission Document?

Part

Specific Landscaping, especially to the south.

Improvements along Mayers Road for emergency access to new development and any benefits for that road (i.e. turning circle).

Noise issues relating to railway line.

Equipped Play Space.

Site Code SHL023	Address King's Farm, Dover Road, Deal	Parish Ringwold with Kingsdown Hierarchy District Centre	Overall SHLAA Score 31 (11-15 Years)	Area 4.04 Ha Indicative No. of units @ 30 dph = 121
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site <p>Square shaped site located on the southern boundary of Walmer currently being used as paddocks for grazing horses. The site is located on the top of a hill and falls to the east and west and consequently the site is higher than the A258 (which runs along the western boundary). The Current access to the site is on the western boundary from the A258. This boundary has a redbrick wall running the length of the site with dense scrub/trees growing around it. The eastern boundary also has a line of scrub and trees. The northern boundary treatment is mixed, consisting of various chain link or wooden fencing, associated with the neighbouring residential properties, which are approximately five years old. The southern boundary is delineated by a line of scrub.</p> <p>In addition to the residential to the north, the other neighbouring uses consist of either agricultural related development and sporadic residential development (to the south) and agricultural land (to the east and west).</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The northern boundary abuts the settlement confine.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development				
Historic Environment There are no Listed Buildings within or adjacent to the site. The Upper Walmer Conservation Area is 0.36 km away from the site. The wall could be a Heritage Asset due to the location on the edge of Walmer. This should not preclude development though.				
Landscape Impact The site initially appears almost completely hidden behind existing housing and Walmer Court Farm complex. To gain an acceptable access into any development, a section of the wall near to the access would have to be removed. This will open the site up and change the character of the area. <p>Further south towards Ringwold, the site is more evident but there is a backdrop of trees and farming buildings, which provide partial screening. From the north and east the site is equally hidden.</p> <p>However, from the west (viewed from Liverpool Road), the site is completely exposed. Whilst the current farm buildings do not detract from the visual appeal, any further development, especially residential buildings, would harden the urban fringe. This would be detrimental to this area as the site occupies one of the key entrances to Walmer/Deal.</p>				
Biodiversity Past surveys reveal little, especially when compared with aerial views from Google Earth (2007, accessed may 2011). The site appears to be under horse grazing, but possibly under-grazed. This				

would suggest that survey is necessary. This site could have chalk bedrock close the surface which could lend itself to specialised habitat opportunities. While biodiversity is not a total constraint, further investigation may limit the areas of developable land.

EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha	Appropriate Assessment: screening for in-combination impacts
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Green Infrastructure

There are PRow near by, but the site is isolated, limiting recreational aspects of GI. The ambience of the surrounding area is likely to be diminished slightly with development. Biodiversity aspects need more investigation. Although there may be an opportunity for some enhancement – this would be of an ‘island’ character, however, limiting its benefits. The topography would suit SUDS. Overall it is considered that the GI balance is neutral.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There are two possible access points on to the site. One from Dover Road from the north west corner of the site and the other further south on Dover Road utilising the existing access to a small retail area.

With regard to first option, to gain adequate sight lines for a 30mph speed limit, the access would need to be located further south, a section of the existing wall would have to be removed and a footpath would have to be provided on the east side of the A258 to the existing bus stop. A right hand turning lane would also need to be provided for safe access into the site. This would be achievable but would require land from the site resulting in the removal of a longer section of the wall. Crossing points would also be required due to road traffic speeds.

With regard to the second option (which was not suggested in the submission) there are concerns about utilising the existing access to the retail area for the additional dwellings. This is in close proximity to another junction which could have crossroad movements. In addition the cost of the length of access road to be constructed (at approximately £1000 per sqm) would make the scheme for 120 dwellings unviable. If this site is to be access it would be better to have an access directly into the site somewhere along its frontage on Dover Road.

As there is only one possible access the amount of residential units would have to be limited to 50 as, above this figure, a secondary or emergency access would have to be provided. There is, however, no obvious route for this emergency access road.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

There is a bus stop adjacent to the site on the A258 (bus route 15 (every half hour) and 15a (hourly) to Deal and Dover). There are some retail units located further south (for example a furniture shop) and car wash. The nearest shops are located 0.5km away (A258/Station Road junction).

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although the site is located close to a bus stop and is within walking distance of local shops, development of the site is considered to be unsuitable because of the detrimental impact it would have on the wider landscape and setting of Walmer. Development of this size could also require a secondary access which does not appear to be possible.

Consideration for inclusion in the Submission Document?	No
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Site Code SHL072	Address Rays Bottom. Walmer	Parish Walmer	Overall SHLAA Score 29.5 (+15 Years)	Area 4.4 Ha Indicative No. of units @ 30 dph = 132
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular shaped site located on the south eastern corner of Walmer. The site consists of agricultural fields and a small section of scrub in the most northern part set in a rolling landscape. The site itself rises from Liverpool Road in the east to the residential properties at Hawksdown to the west. There is no natural boundary to the south and the land continues as agricultural fields. Liverpool Road is a narrow country lane. There is scrub land to the east of Liverpool Road (which is open access land). There are further residential properties to the north.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The western and northern boundaries about the urban boundaries.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development				
Historic Environment There are no Listed Buildings within or adjacent to the site.				
Landscape Impact The site is discrete, having housing on two sides and being located on the side of a dry valley. The sensitivity of the site is moderate to low as views in are limited and the flow of housing down the slope would not detract. Landscaping to the south of the site would provide mitigation for visual intrusion.				
Biodiversity Northern part of site identified as semi-improved neutral grassland in 1990 and 2003 surveys, although aerial photography indicates that there may be a substantial chalk grassland component. Despite this part now appearing to be scrubbing over, it still constitutes a NERC S.41 priority habitat. However, there may potential to enhance this habitat as part of a mitigation package, together with the provision of substantial landscaping to the south. Further investigation would be necessary, but the site would not warrant exclusion at this stage.				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: screening for in-combination required.		
Green Infrastructure There are several PRow in the vicinity that provide access to the wider countryside. The northern part of the site has a biodiversity interest and there may be potential for linking this in with these wider recreational paths, through the creation of a ‘pocket park’ that could provide wider benefits. The topography gives a limited potential for SUDS, but in this dry valley and the creation of some ‘wet’ habitat could be beneficial.				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Liverpool Road is narrow and is subject to the national speed limit. The speed limit would have to be changed for a suitable access onto it. Any new development would also have to provide a footpath, street lighting and a secondary access.

Although there are no issues at this stage that would suggest that this site would be unsuitable for development, there are concerns that 132 plus units would have a detrimental impact on the wider road network, in particular at the Grams Road and Liverpool Road junction. A Travel Assessment and Travel Plan would need to be undertaken to ensure that the increase in traffic would not have a detrimental impact on the wider road network.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is on a bus route (route 82, hourly to Kingsdown and Deal – in one direction as it is a circular route) but the bus stop is located on Gram’s Road which is approximately five minutes walk away. There is a private Doctors surgery in Hawksdown, to the north west, which would be approximately ten minutes walk away. There are also local shops along Dover Road, but these would take approximately 15 minutes to walk to.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site has a number of positive aspects. The impact on the wider landscape would be minimal and this could be reduced further by providing additional buffer of landscaping along the southern boundary. This buffer zone could also improve habitat in the area. There are facilities located within ten to fifteen minutes walk away and development would not have a detrimental impact on any heritage assets.

There is, however, concern that the wider highway network would not be suitable. Without the relevant transports assessments and plans it would not be possible to allocate this land.

Consideration for inclusion in the Submission Document?

No

- Landscape and biodiversity mitigation
- Footpath
- Bus stop
- Travel Assessment and Travel Plan

Site Code SHL039	Address Land at the western end of Hawkshill Road, Walmer	Parish Hierarchy District Centre	Overall SHLAA Score 31 (11-15 Years)	Area 0.75 Ha Indicative No. of units @ 30 dph = 22
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped site located at the eastern end of Hawkshill Road, which is a private, unmade, road. The site is located on a plateau and consists of agricultural land. The neighbouring residential dwellings to the east are located on a slope falling north eastwards. There are three residential properties directly opposite the site to the east. There are agricultural fields to the south and west of the site. The grounds of Walmer Castle are further to the north. There are trees and scrub along the eastern, southern and western boundaries.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is completely outside the Urban boundaries, being separated from them by Open Access land.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development Historic Environment Walmer Castle is a Scheduled Monument and the grounds are a Historic Park. Any development at this scale would have a detrimental impact on the setting of the Castle and Historic Park, which are important Heritage Assets. Landscape Impact Despite some hedgerow cover around the boundary, the site is located in a prominent position on the crest of a hill. The site is sensitive as it is adjacent to the Historic Park. Intensification of the urban form in this location would not be in keeping with the surrounds and would have a significant adverse impact on the landscape and historic park. Landscape concerns would indicate that the site should be excluded. Biodiversity The site abuts a Local Wildlife Site (also Open Access Land) and would be easily accessible by the residents of any new properties, which could increase recreational pressures on that site which is identified as containing, in part, chalk grassland, a Natural Environment and Rural Communities Act S.41 priority habitat. Mitigation for impact would not be possible. Biodiversity concerns indicate that the site should be excluded.				
EIA Screening: S.2.10 screening required – urban infrastructure project > 0.5 ha		Appropriate Assessment: screening for in-combination impacts.		
Green Infrastructure The locality is relatively rich in GI, predominantly in footpaths, some with channel views, creating a pleasant ambience. To insert housing into such would decrease that experience, adversely impacting on the promotion of exercise and well-being. The potential adverse impacts on biodiversity are cited above.				

Development could not enhance, mitigate, or compensate for this loss of GI, indicating that the site should be excluded.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Hawkshill Road is private and any development would need permission from the current residents. Access to public highway (Kingsdown Road) is already established. There are no footpaths along Kingsdown Road where Hawkshill Road meets it, although there is a footway/cycle path along the sea defences to the east.	
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk The site is within five minutes walk from a bus stop, which is located on Kingsdown Road, close to the Hawkshill Road junction. Other services can be found within the Deal urban area, although all are beyond a ten minutes walk.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis The site is divorced from the main town and is outside of the Urban boundaries in an exposed and highly visible location. Our analysis shows that these are barriers to development in connection with both biodiversity and GI provision. Development here would also have a detrimental impact on the wider landscape and the Historic Park at Walmer Castle.	
Consideration for inclusion in the Submission Document?	No

Aylesham

Site Code SHL083 (AYL01)	Address Land to the north of Aylesham Local Plan Expansion Area	Parish Aylesham	Overall SHLAA Score 27.50 (Undeliverable)	Area 36.49Ha
		Hierarchy Rural Service Centre	Indicative No. of units @ 30 dph = 1098	
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>A large roughly triangular shaped area located to the north of Aylesham. The site is located on the top of a plateau in the open countryside and consists of agricultural land that has been divided into fields by hedgerows (grown for agricultural windbreaks).</p> <p>A railway line runs down the eastern boundary, beyond which there are more agricultural fields and the hamlet of Ratling. The B2048 forms the western boundary, beyond which there are more agricultural fields. The road also delineates the district boundary with Canterbury. To the south, beyond the ancient hedgerow that delineates the boundary, there are open fields but these have been allocated in the 2002 Dover District Local Plan for the urban expansion of Aylesham.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The land immediately to the south of the site has been allocated for the expansion of Aylesham. The existing confines are approximately 200m further south.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, residential development would be appropriate in this zone.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The Ratling Conservation Area (and approximately six Listed Buildings) is located approximately 200m to the east from the nearest point of the site. The railway line, however, runs between the site and the Conservation Area and there would be little impact on these Heritage Assets.</p> <p>The site lies in an area that is rich in cropmarks. These cropmarks, which show evidence for buried archaeological landscapes, include enclosures, ring-ditches, field-systems and trackways. Finds from the area include prehistoric worked flint scatters, an Iron Age coin and early medieval brooch.</p> <p>Development should be avoided on parts of the site where significant cropmark concentrations lie. Pre-determination evaluation would be necessary to determine whether development is possible within other parts of the site.</p>				
<p>Landscape Impact</p> <p>The character of the area is bland, without substantial boundaries, except for the ancient hedgerow to the south. The site is on a plateau and has an exposed western boundary vegetated only by agricultural windbreaks. Development would be highly visible from the west and Adisham. The Inspectors report into the Dover District Local Plan concluded that built development in this sensitive landform would create a significant risk of visual damage to the wider landscape. It would also be beyond the structural landscaping limit identified for the expansion of Aylesham.</p>				
<p>Biodiversity</p>				

<p>There may be farmland bird interest that would require investigation. There is scrub along the railway, which may include wildlife interest. Apart from these the only interest would be the boundary hedge to the south. Bat surveys along this would be necessary.</p>	
<p>EIA Screening: Essential due to size and also cumulatively with existing permission at Aylesham.</p>	<p>Appropriate Assessment: Essential due to size and also cumulatively with the existing permission at Aylesham. Since it would be possible to require retro-fitting of any mitigation to the existing permission, any cumulative mitigation measures would fall to new sites.</p>
<p>Green Infrastructure</p> <p>The site is bounded to the east and south by PRow (ER283 and EE286a, respectively) and transacted by two further PRow (ER284 and EE286). These provide strong linkages between the north of Aylesham and Adisham. However, the nearest sizeable semi-natural habitat is over 1km walking distance away and the site would have to provide substantial GI, including semi-natural space.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The proposal would be in addition to the existing proposals at Aylesham for 1,000 homes, which would require a substantial package of transport and highway improvements. Access for this proposal may be achievable through the Local Plan proposed site onto Dorman Avenue North and its junction with the B2046. Further improvements would be required along the B2046 and with its junction to the A2. Owing to the size of the development, public transport and traffic calming measures would be needed in surrounding villages. The range of these measures could only be determined through more detailed work.</p>	
<p>Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school</p> <p>The northern tip of the site is approximately 250m from Adisham Station. The centre of Aylesham, with a range of facilities, is approximately 850m away from the southern most part of the site. The size of the site could provide localised facilities if it was to be developed.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is located within the sequentially preferable Flood Zone 1 and development could provide improved GI, the size of the development located in a highly visible location (on a plateau) would have a detrimental impact on the wider landscape. Aylesham also already has 1,000 dwellings allocated and this should be developed in the first instance before any further land is allocated.</p>	
<p>Consideration for inclusion in the Submission Document? No</p>	

Site Code AYL02	Address Land to south of Spinney Lane and West of Aylesham Road.	Parish Aylesham	Overall SHLAA Score 29.5 (+15 Years)	Area 56.55 Ha
		Hierarchy Rural Service Centre		Indicative No. of units @ 30 dph = 1522
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>A large irregular site located to the south of Aylesham. The site consists of open, undulating farmland with an Ancient Woodland located in the middle. The District boundary line with Canterbury City Council crosses the site so that half of the site is outside of Dover District.</p> <p>Spinney Lane runs along the northern boundary of the site. This road runs along the southern limits of the built form of Aylesham, which consists of mixed uses (from west to east, employment, open space and residential). Aylesham Road runs down the eastern boundary of the site. The majority of the land beyond this road is an agricultural (AYL03) but there is a small area for gypsies and travellers and a residential property. The former colliery homes at Snowdown are located at the south eastern corner of the site. The half of the site within Canterbury District consists of agricultural fields. Beyond this part of the site, to the south, there are further agricultural fields and, to the south west, the hamlet of Womenswold. These are within the Kent Downs AONB.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>The site lies outside of the settlement confines and only a very small section (north eastern corner) is adjacent to them. There is also an Ancient Woodland located at the centre of the site.</p> <p>Approximately half of the site falls within Canterbury City Council’s boundary. This land falls within a Special Landscape designation in the adopted Canterbury Local Plan (2006) and abuts the Kent Downs AONB and the Womensworld Conservation Area.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas located within or adjacent to the site. There would be little impact on these acknowledged Heritage Assets.</p> <p>Landscape Impact</p> <p>The site is at the head of a shallow valley running towards Nonington. The site falls to the south and then rises towards Snowdown. It comprises arable farmland and ancient woodland. It is open to long distance views from the south and west. Development of this area would further transform the countryside, leading to considerable damage to its character and the setting of the AONB which abuts it to the South West.</p> <p>Biodiversity</p> <p>The site includes 3 Ancient Woodlands which should be protected, buffered and, potentially, connected to reverse fragmentation. This would require landscape-scale GI intervention. Additionally, there may be some biodiversity interest in the hedgerows. There is potential for biodiversity enhancement due to the proximity of chalk grassland to the southeast.</p>				

<p>EIA Screening: Essential due to size and also cumulatively with existing permission at Aylesham.</p>	<p>Appropriate Assessment: Essential due to size and also cumulatively with the existing permission at Aylesham. Since it would be possible to require retro-fitting of any mitigation to the existing permission, any cumulative mitigation measures would fall to new sites</p>
<p>Green Infrastructure</p> <p>The site is transacted by a number of footpaths (EB212, EE200, CB 208, EE301) and a bridleway CB211 which could form a spine for woodland connectivity. Development would require considerable investment in GI, which the ancient woodlands would not be expected to provide, but rather be protected by.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The proposal would be in addition to the existing proposals at Aylesham for around 1,000 homes (and any possible employment uses at Snowdown), which themselves require a substantial package of transport and highway improvements. Access for this proposal may be achievable onto Spinney Lane but would require substantial engineering improvements to Spinney Lane and its junction with the B2046. Further improvements would be required along the B2046 and with its junction to the A2. Owing to the size of the development, public transport and traffic calming measures would be needed in surrounding villages. The range of these measures could only be determined through more detailed work.</p>	
<p>Access to Services SHLAA Score: 7.0 – Within 5 minutes walk of rail station, GP surgery and school</p> <p>The northern boundary is adjacent to the existing urban area and is 270m from the centre where there is a new health centre and local shops. Aylesham Primary School is approximately 700 metres walk away. Development at this scale would probably have to include additional local facilities.</p>	
<p>Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is within the sequentially preferable Flood Zone 1 and development would have little impact on any Listed Buildings or Conservation Areas, development of this area would further transform the countryside, leading to considerable damage to its character (including the setting of the Ancient Woodland) and the setting of the AONB, which abuts the site to the South West. The village is already subject to major expansion and further development in this area would not be appropriate. It is likely that very substantial transport upgrades would be required to support this development in addition to those already identified for the existing proposals for Aylesham. It is also considered that there is no justification for further development at Aylesham beyond the existing proposals. The western part of the site is within Canterbury City Council's area and development would be contrary to their Local Plan policies.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code AYL03	Address Land to the east of Aylesham Road, Aylesham	Parish Aylesham	Overall SHLAA Score 26.5 (Undeliverable)	Area 5.33 Ha
		Hierarchy Rural Service Centre		Indicative No. of units @ 30 dph = 159
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Rectangular shaped site located to the south east of Aylesham. The land is in agricultural use. There is a bank of trees running along the northern, western and southern boundaries. The eastern boundary is generally open with sporadic hedgerow.</p> <p>The site falls between Aylesham Road (along the western boundary) and the railway line (along the eastern boundary). There are open fields beyond both of these transport routes (the land to the east has also been put forward for development (AYL02)). To the north of the site there are former High School playing fields that were identified in the 2002 adopted Local Plan for employment uses. As with other Aylesham Policies, this policy has been 'saved'. To the south there is a residential dwelling (Keepers Cottage) and a residential caravan site (Snowdown Caravan Site).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is outside of the settlement confines and at the nearest point the site is 200m away. The site is adjacent to the former school playing fields, which have been designated for employment use in the saved Local Plan Policy AY4.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas located within or adjacent to the site. Development would have no impact on acknowledged Heritage Assets.</p> <p>Landscape Impact</p> <p>The site is an arable field that lies at the base of a shallow valley. It is divorced from the landscape to the northeast by the railway cutting. However, it is open to views from the west and southwest. Although the site is next to an employment allocation and a gypsy/traveller site, it is physically divorced from the built up part of Aylesham. It would be readily visible viewed from Spinney Lane to the west and the Snowdown/Woolage Road to the south. Development of this site would add significantly to the intrusion of built form into the countryside.</p> <p>Biodiversity</p> <p>Could be some biodiversity interest in surrounding scrub/trees along railway line.</p>				
EIA Screening; needed due to size			Appropriate Assessment; there would be a need to consider this both in terms of the Thanet Coast SPA mitigation strategy and potentially, in-combination with the existing permission at Aylesham.	
Green Infrastructure				

<p>The site is relatively isolated. To the south bridleway EE299 crosses the railway, linking Nonington to Womenswold. There is relatively little GI elsewhere and there should be an attempt to link the site to Aylesham.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Access would be acceptable onto Aylesham Road in conjunction with improvements to the junction of Spinney Lane with the B2046.</p>	
<p>Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school The site is located approximately 760 metres from the centre where there is a new health centre and local shops. The site is 1.2km from Aylesham Primary School. The nearest bus stop is approximately 280m north of the site. This serves the 89 route which runs hourly to Canterbury and Dover. Land immediately to the north of the site has been allocated in the Dover District Local Plan for employment uses.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis Although the site is located within walking distance of local facilities and is within the sequentially preferable Flood Zone 1, development of this site, which is divorced from the built form, would add significantly to the intrusion of built form into the countryside. Aylesham also already has planned expansion and this additional land could not be justified.</p>	
<p>Recommend for inclusion in the Submission Document?</p>	<p>No</p>

Sandwich

Sites submitted as part of the LDF process but now have Planning Permission

Site Code	Location	Total No / Outstanding	Planning Application Reference	Notes
PP009	Stonar Industrial Estate	Not Started	DOV/11/00417	Employment Site

Site Code SHL082 (SAN04M)	Address Richborough Power Station	Parish Sandwich	Overall SHLAA Score 26 (Undeliverable)	Area Approximately 82ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped site that straddles the Dover and Thanet boundary and is located approximately 3.5km north of Sandwich. There is only a small section of the former power station site located within the District and this consists of the main entrance and the National Grid Station (still operational). The second part of the site consists of a large 'banana' shaped piece of land, associated with the power station which was a former landfill site. This land rises slightly and is grazed. This site is separated from the neighbouring uses to the east and the former power station site to the north by the River Stour, which runs down the entire length of the site. The site is located on the edge of an industrial/business area and the neighbouring uses to the east and south consist of, petrol stations, derelict land, waste businesses and storage. To the north of the power station site (within Thanet) there is low lying open farmland, which was once the Wantsum Channel. To the west of the site there is open low lying farmland. The site connects to the A256, which is currently being widened to a dual carriageway at this section of the road.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is located outside of the settlement confines but the small part of the power station within this District falls within the Saved Local Plan Policy AS14, which has identified the area for B1/B2/B8 employment uses. The site has also been identified in the Kent Waste and Minerals Local Plans for Waste to Energy, Waste Separation & Transfer, Category A Waste Preparation for re-use and the wharf is protected. The Core Strategy and the Sites DPD, which form the Kent Minerals and Waste LDFD, are currently being progressed by KCC. The whole site is currently being considered for use as an 'Energy Park'. The cooling towers and chimney have now been demolished. There is also a Safeguarding Order covering the entrance to the site for the Channel Tunnel Rail Link.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Flood Risk The small area of the power station site that falls within the District is within Flood Zone 2 in the SFRA but revised mapping from the EA indicate that it is now Flood Zone 1. With climate change considered this rises to Flood Zone 3 in the SFRA. The northern part of the 'banana' land is within Flood Zone 3 for both the current and climate change. The remaining area to the south, where the land rises, is outside the flood risk area. The site would be, however, cut off in the event of a flood. With regard to the Maximum Breach modelling, the small area of the former power station site within the District is outside the flood risk area.				
Historic Environment There are no Listed Buildings or Conservation Areas within the site. Richborough Castle, a Scheduled Monument and Listed Building, is however, located at the southern most tip of the site. Any development in this location would have to consider the setting of this.				

Landscape Impact

The 'banana land' site is discrete in the north, where views of it are restricted due to the presence of the railway and the power station. In the south, it appears as an anomalous high feature in the grazing marsh, being a landfill site. It is difficult to imagine how this site could be brought forward for housing without removal of the land-fill component, as the impact otherwise would be generally deleterious, and specifically harmful to the setting of Richborough Castle SAM. There would be a need for a major new crossing of the River Stour which would also have harmful visual impact. The site has been harmed by changes associated with the land-fill and the power station (pipework and ash settling ponds), but still retains its essential rural marshland character.

Biodiversity

The northern section of the 'banana land' and adjacent River Stour is part of Ash Level and Richborough Pasture LWS is a LWS and thus protected under Policy CP7. The southern part of the site is land-fill and disturbance to this could have leachate implications on the biodiversity of the nearby watercourses. The site may support water voles and works to encourage decolonisation by otters could be undermined through predation or disturbance by domestic pets. Development would neither maintain nor enhance biodiversity.

EIA Screening: Essential due to size and location.

Appropriate Assessment: Essential due to the multiple-designated River Stour within 200m of the site. Also, potential recreational impacts need full consideration. Contribution to the Thanet Coast SPA mitigation strategy would not alone provide sufficient mitigation due to ease of access to Pegwell Bay.

Green Infrastructure

The site is an integral part of the local GI network in terms of providing biodiversity connectivity and a climate change corridor for species movement. Additionally, PRow EE 42 runs alongside the river and forms part of the Saxon Shore Way long distance path and the Stour Valley Path. Development in such an area should be avoided.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There is an existing access to a roundabout on the A256, which at this point is dual carriageway. The entrance is currently safeguarded for the Channel Tunnel Rail Link.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

The 87 and 88 bus routes (hourly service to Ramsgate and Sandwich) run along the A256. The site is located approximately 3.5km away from the town of Sandwich with a wide range of facilities. There are two petrol stations, with shops, located adjacent and approximately one hundred metres away from the former power station site.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although there is a good access to the former power station site, the site is not suitable for residential development as it is in a location far from any local services and would have a detrimental impact on the European nature conservation designation.

The power station site is being considered for a minerals or waste use in the Kent Minerals and Waste LDF.

Consideration for inclusion in the Submission Document?

No

Site Code SHL074 (SAN05M)	Address Sandwich Industrial Estate, Sandwich	Parish Sandwich	Overall SHLAA Score 27.5 (Undeliverable)	Area 6.51 Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
Description of Site <p>Flat, irregular shaped site located to the north of Sandwich. The site falls on land lying between residential properties (Stonar Gardens, Stonar Close and the new development Willowbank) to the south west of the site, industrial uses to the east and Stonar Lake to the north.</p> <p>The site has been divided into different plots primarily for industrial/storage uses with the exception of a café fronting the main access road to the rest of the industrial area. This road passes through the site, dividing the site into north and south sections.</p> <p>The northern section has had less investment and is generally overgrown and untidy in appearance with a rough track serving the storage businesses located there. There is also a derelict building located here, which is overgrown with ivy and saplings. There are mature trees growing along the main access track and there appears to be scrub along the northern boundaries. There are two large industrial buildings fronting the main access road have been built to reflect the standard of buildings in the southern section.</p> <p>The southern section consists of a number of small industrial units. Those in the southern most part of the site are vacant and are becoming overgrown. There is one large industrial unit located outside of the site area to the east, which is in use. Land further south has been cleared for the housing development but not yet developed. There are well established trees along the main access road and scattered throughout the site. There is also a belt of mature trees in Stonar Close, which runs along the western boundary.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
<p>The site is approximately 140m away from the settlement confine.</p> <p>The majority of the site is, however, subject to saved Local Plan Policy AS15, which allocates land north of the River Stour for mixed use, including 300 dwellings, a hotel and employment uses (B1, B2 and B8). The western part of the site does not fall within this allocation and the section within the allocated area only forms a small part (approximately a quarter of the area allocated). A planning application for 300 dwellings has been approved and part implemented on land to the south, so any residential development at this site would be in addition to the number of units identified in the Policy at the loss of employment land.</p> <p>The Key Diagram and Figure 3.5 in the adopted Core Strategy also identifies this area as having an opportunity for mixed use to be explored.</p>				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Flood risk <p>The site falls within Flood Zone 3 and within the Maximum Breach area (as modelled in the SFRA). Alternative sites should, therefore, be considered for residential development. The southern part of the site does, however, benefit from flood risk measures that have been built, in part, for the residential development to the south. The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015.</p>				

Historic Environment

There is a Scheduled Ancient Monument (an old Medieval port) that covers the majority of the northern part of the site. Any form of development here would have a detrimental impact on the Ancient Monument and should be avoided.

The Sandwich Conservation Area, along with numerous Listed Buildings, is approximately 143m to the south and there is a Historic Park or Garden (The Salutation) also a similar distance away to the south. Whilst development would not impact on the Historic Park, the potential loss to development of the soft green approach to historic Sandwich along Ramsgate Road would be detrimental to the setting of the Conservation Area. The current use in this location, whilst untidy, is very low density development surrounded by trees and scrub. Development here could also set a precedent for even further development on the open space immediately to the south.

Development of the just the southern part of the site area would not impact on the historic assets (please see SHL074V).

Landscape Impact

The existing storage uses close to Ramsgate Road are untidy and have a detrimental visual impact. The remainder of the site is currently fairly discrete, although being open to views from the Stonar Lake surrounds, there are no PRoW in the locality, excepting Ramsgate Road which is partially screened by Pine trees along the lakeside. However, the current condition may not remain, with consideration of the Discovery Park EZ and the National Coastal Path and although the character of Stonar Lake may have been compromised to the north, it remains an asset which premature development could damage.

Biodiversity

Appropriate assessment is needed because proximity to European sites: Sandwich Bay SAC, Thanet Coast & Sandwich Bay RAMSAR Site, Thanet Coast & Sandwich Bay SPA. The Sandwich Bay to Hacklinge Marshes SSSI also requires consideration. Stonar Lake has been recorded as supporting wintering Slavonian Grebe. Common reptiles are known to occur on the southern shore of the lake. There are mature trees on the site, together with a number of buildings which could support bats. Full biodiversity assessment would be essential for this site.

EIA Screening: Essential due to size, location and multiple sensitivities.

Appropriate Assessment: Essential due to the multiple-designated River Stour within 200m of the site. Also, potential recreational impacts need full consideration. Contribution to the Thanet Coast SPA mitigation strategy would not alone provide sufficient mitigation due to ease of access to Pegwell Bay.

Green Infrastructure

Stonar Lake provides both a great opportunity for GI as well as having sensitivities associated with the neighbouring River Stour and the whole area lies within the GI Network for enhancement. Any development to the south of the lake should be part of a wider masterplan than could bring forward a sustainable use of the wider area.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There are two possible accesses to the site. The first is directly off Ramsgate Road and the other would be onto the access road serving the industrial estate. Without the relevant studies it is not clear whether the mix of residential traffic and industrial traffic would be acceptable this far into the industrial estate. If it is then a second access point would be required for emergency vehicles.

Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school

The site is adjacent to a bus route (the 87/88 hourly to Sandwich and Ramsgate) and is within ten minutes walk of the Doctors surgeries in The Butchery and Market Square from the nearest point.

The main town centre, with a range of local facilities and shops, is also within ten minutes walk away.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 2.0 – Multiple 5-10 hectare

Analysis

Although the area is identified as having an opportunity for mixed development in the Core Strategy and is located around ten minutes walk away from the town, development of the site would have a detrimental impact on the setting of the historic town with the loss of the important soft green space leading into it. Any form of development on the northern part would also have a detrimental impact on the Ancient Monument (located in the northern part of the site) and should be avoided. There would also be a loss of employment land and there are doubts as to whether the access would be suitable.

Appropriate Assessment would be essential and could be a major obstacle to development due to adverse impacts to nearby European sites. Furthermore, the site is located within Flood Zone 3, so alternative sites for residential development should be considered in the first instance.

Consideration for inclusion in the Submission Document?

No

Site Code SHL074V	Address Land at Sandwich Industrial Estate	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 30 (11-15 Years)	Area 1.37 Ha Indicative No. of units @ 30 dph = 41
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>An amended area of SHL074, only including the section south of the main access road to avoid development on the Scheduled Monument.</p> <p>The site consists of a number of small industrial units. Those in the southern most part of the site are vacant and are becoming overgrown. There is one large industrial unit located outside of the site area to the east. Land further south has been cleared but not yet developed for housing. There are well established trees along the main access road and scattered throughout the site. There is also a line of trees along the western boundary but these are within Stonar Close.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>The site is approximately 140m away from the settlement confine.</p> <p>The site is, however, subject to saved Local Plan Policy AS15, which allocates land north of the River Stour for mixed use, including 300 dwellings, a hotel and employment uses (B1, B2 and B8). An application for 300 dwellings has already been approved and part implemented on land to the south, so any residential development at this site would be in addition to the number of units identified in the Policy and would be at the expense of employment land.</p> <p>The Key Diagram and Figure 3.5 in the adopted Core Strategy also identifies this area as having an opportunity for mixed use to be explored.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 3 and within the Maximum Breach area (as modelled in the SFRA). Alternative sites should, therefore, be considered for residential development. The site does, however, benefit from flood risk measures, which have been partly built for the residential development to the south. The Environment Agency has also recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015.</p> <p>Historic Environment</p> <p>There is a Scheduled Monument (an old Medieval port) to the north of the site. Redevelopment of the industrial units could improve the setting of this historic asset.</p> <p>The Sandwich Conservation Area, along with numerous Listed Buildings, is approximately 143m to the south and there is a Historic Park or Garden (The Salutation) also a similar distance away. As there are already industrial units on the site and there are new residential properties behind, there would be no impact on the Historic Assets.</p> <p>Landscape Impact</p> <p>Except to the east, the site is contained by built environment and development would not have any undue impact as long as the detail of the eastern boundary was carefully considered. There may be some landscape interest in individual trees. The character of the landscape would not be significantly altered.</p> <p>Biodiversity</p>				

<p>The site contains some rough grassland that may support common reptiles. The buildings on the site are unlikely, through past commercial uses, to favour bat roosting. The trees on the site will be of limited wildlife interest. The proximity of the European sites: Sandwich Bay SAC, Thanet Coast & Sandwich Bay RAMSAR Site, Thanet Coast & Sandwich Bay SPA as well as the Sandwich Bay to Hacklinge Marshes SSSI associated with the River Stour (under 200m distant) needs to be considered.</p>	
<p>EIA Screening: Necessary due to size</p>	<p>Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would not alone provide sufficient mitigation due to ease of access to Pegwell Bay and it may be necessary to consider buffering of the approach to the River Stour.</p>
<p>Green Infrastructure</p> <p>The forthcoming National Coastal Path needs to be considered. The site is within the GI Network for enhancement. However, overall the site appears to be GI neutral.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site has an access onto the main access road to the industrial estate, which leads to Ramsgate Road. This road also serves Stonar Gardens and Stonar Close. Without the relevant studies it is not clear whether the mix of residential traffic and industrial traffic would be acceptable this far into the industrial estate.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>There is a bus route (the 87/88 hourly to Sandwich and Ramsgate) along Ramsgate Road, this is approximately five minutes walk away from the site. The site is within 15 minutes walk of the Doctors surgeries in The Butchery and Market Square from the nearest point.</p> <p>The main town centre, with a range of local facilities and shops, is also within fifteen minutes walk away.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The area is identified as having an opportunity for mixed development in the Core Strategy, is located around ten minutes walk away from the town and is well contained within the existing built form. The new boundary line, excluding the Ancient Monument (which SHL074 included) has also overcome the concerns relating to the Historic Assets.</p> <p>The site is, however, still located within Flood Zone 3 and, despite the existing and proposed flood defences, alternative sites for residential development within sequentially preferable sites should be considered in the first instance. There would also be a loss of employment land.</p> <p>Furthermore, without the relevant studies it is not clear whether the mix of residential traffic and industrial traffic would be acceptable this far into the industrial estate.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAN03M	Address Land to rear of Sandwich Industrial Estate	Parish Sandwich	Overall SHLAA Score Not scored as within Flood Zone 3	Area 3.6 Ha Indicative No. of units @ 30 dph = 108 (assuming all residential)
<p>Current Use SHLAA Score: --</p> <p>Description of Site</p> <p>Flat irregular shaped site located to the north east of Sandwich. The site lies on land between the River Stour (to the north east and south) and Sandwich Industrial Estate (to the east) and is used for a variety of uses including a boat builders yard, storage (containers) and boat moorings. There is one large building located on the land, which is associated with the boat builders. Access is from Bridge Close, a single width road, which leads the main distributor road in the Sandwich Industrial Estate.</p> <p>To the north, east and south, beyond the river, there are open fields. The site is separated from the Industrial estate by a strip of scrubland.</p> <p>The site has been suggested for mixed development.</p>				
<p>Policy Alignment SHLAA Score: --</p> <p>The site lies outside the town boundary and is also outside the area allocated in saved Local Plan Policy SA15.</p>				
<p>Physical Constraints SHLAA Score: --</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 3 and the Maximum Breach area (as modelled in the SFRA). Employment uses would be compatible with this flood zone. Residential should be located in less vulnerable locations.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. Development would, however, have a detrimental impact on the setting of the historic town of Sandwich.</p> <p>Landscape Impact</p> <p>The site has a typical untidy commercial character associated with a boatyard with river frontage, in which the landside is used for open storage. However, as with farm buildings in agricultural landscapes, the very functionality of the boat yard lessens its adverse visual impact. The backdrop to the west and southwest are commercial buildings. Residential development here would be incongruous feature in the landscape and bring an urban element into what is otherwise a rural riverside landscape.</p> <p>Biodiversity</p> <p>Sandwich Bay SAC, Thanet Coast & Sandwich Bay RAMSAR Site, Thanet Coast & Sandwich Bay SPA and Sandwich Bay to Hacklinge Marshes SSSI comprise the majority of the site boundary. The site itself has patchy areas of grassland with scrub which could support common reptiles. It is unlikely that there is any substantial wildlife interest on the site itself.</p>				
EIA Screening: Essential due to size and location.			Appropriate Assessment: Due to proximity of European sites, redevelopment would pose major issues of disturbance. Housing would be unacceptable due to urbanisation impacts.	

Green Infrastructure	
The site is GI neutral. It lies within the GI network and, for GI purposes, the preferred future of this site would be reversion to open space, to allow enhancement of protection for the European sites.	
Proximity to Road Network SHLAA Score: --	
Access is by Bridge Close, which is a single width road with passing places. The site does not connect to an adopted highway and as such we would need to be satisfied that the road leading to the development was laid out to an adoptable standard. There appears to be no scope to provide an alternative emergency access and the level of development proposed in addition to that already being served from a single access is too many.	
The junction with Ramsgate Road (adopted highway) will require upgrading, possibly a right turn lane but perhaps a more suitable access arrangement will be obvious from the junction modelling carried out as part of a TA.	
Accessibility to the site by foot and cycle is poor. An improved access would be required between the site and Sandwich Town, avoiding the existing industrial site, which would make dependence on the private car extremely high and the site highly unsustainable. There is an existing PROW on the opposite side of the river abutting the site, perhaps links to this could be further explored.	
A full Transport Assessment and Travel Plan will be required for this level of development.	
Access to Services SHLAA Score: --	
The site is just over 700m from Ramsgate Road, where there is an hourly bus service (87/88). The main town, with a wide range of local facilities, is just over 1.2km away from the site.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site is in a poor location for residential development, being some distance from public transport and local services. The site would also introduce an incongruous feature into the landscape, introducing an urban element into what is otherwise a rural riverside landscape. Concerns have been raised over the access and the lack of opportunity for an emergence access if the development was over 50 dwellings. The site is also within Flood Zone 3, alternative sites should be considered for residential development.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL038	Address Downsbridge Gardens, Sandown Road	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score Within Flood Zone 3, not scored	Area 0.42 Ha Indicative No. of units @ 30 dph = 12
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, irregular shaped site located to the east of a small residential development (Sandown Lees), which is located approximately 500m away from the town boundary. The site consists of scrubland.</p> <p>Immediately to the north and south of the site there are two houses, both low density development with large rear gardens. To the west and east there is open farm land. Access is from a track off Sandown Road which is to the east of the site. A drain runs along the eastern side of the track.</p>				
<p>Policy Alignment SHLAA Score: --</p> <p>The site lies almost one kilometre from the urban boundary.</p>				
<p>Physical Constraints SHLAA Score: --</p> <p>Flood Risk</p> <p>The site lies within Flood Zone 3 and within the Maximum Breach area (as modelled on the SFRA). Residential development should be located in less vulnerable locations.</p> <p>Historic Environment</p> <p>There are no Conservation Areas or Listed Buildings within or adjacent to the site. Development of the whole site would, however, be against the grain and character of the neighbouring properties.</p> <p>Landscape Impact</p> <p>The site is very discrete, being bound by hedging and consisting of scrub (Google Earth, 2008, accessed 2011). Development at 30dph would radically change the local landscape character which is of sizeable houses in large plots interspersed with farmland on the town edge. Overall, development would have an adverse impact.</p> <p>Biodiversity</p> <p>There will be some limited biodiversity interest associated with the scrub – small mammals and birds. There may be limited foraging opportunities for bats.</p>				
EIA Screening: Too small			Appropriate Assessment: Given its proximity to Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys.	
<p>Green Infrastructure</p> <p>The site lies within the GI network, indicated for enhancement, but development would not provide any improvement. Overall, development would be neutral in terms of GI.</p>				
<p>Proximity to Road Network SHLAA Score: --</p> <p>The site is accessed from an unadopted track, which already serves four dwellings. Development of 12 dwellings would, therefore, not be suitable. There is no footpath near to the site and the nearest one is approximately 170m away. This footpath is, however, continuous to the town. The site is, however, located almost two kilometres from the main town and there is no bus service. There would be a reliance on the motor car.</p>				

Access to Services SHLAA Score:--	
The town centre, with a range of services and facilities, is approximately two kilometres away. There are no facilities within five or ten minutes walk away and there is no bus service along this road. The site is, therefore, unsustainable.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site is divorced from the main settlement, there would be an adverse impact on the landscape and there are no bus stops within walking distance. The site is also located within Flood Zone 3 and the Maximum Breach area. The site is, therefore, not suitable for development.	
Consideration for inclusion in the Submission Document?	No

Site Code SAN04	Address Land at Archer's Low Farm, St George's Road	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score Not scored due to flood risk	Area 2.27 Ha Indicative No. of units @ 30 dph = 68
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, rectangular shaped site located on the eastern edge of Sandwich. The site is an agricultural field contained within a line of mature trees to the north, east and south. The farm buildings and its access to St George's Road have also been included within the site. The farm buildings are located in the southern most corner of the site. To the west and south west there are residential properties. Sandown Road runs along the northern boundary of the site. Further north, beyond the road, there are agricultural fields. Agricultural fields also lie to the east and south.</p>				
<p>Policy Alignment SHLAA Score: --</p> <p>Although the site is outside of the urban boundary, the western boundary abuts it.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>Updated Flood Zones indicate that this site is now within Flood zone 1, suitable for development.</p>				
<p>The SFRA indicated that the site lies within Flood Zone 3 but falls just outside of the Maximum Breach area. Updated Flood Zones from the EA, however, indicate that this site is now within Flood zone 1, suitable for development. The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015.</p>				
<p>Historic Environment</p> <p>The boundary of the Walled Town Sandwich Conservation Area runs along the western edge of St George's Road. Development of the site would have a detrimental impact on the rural character on the edge of Sandwich through the loss of open space which makes a valuable contribution to the special character. The spaces between buildings are just as important to the character of an area.</p>				
<p>Landscape Impact</p> <p>The site is very discrete, screened by dense tree-belts and the rear of houses on St George's Road. Development could lead to some opening up of the tree-belt and pressure to reduce the extent of the tree cover. Development at 30dph would result an anomalous intensification of development at the town edge.</p>				
<p>Biodiversity</p> <p>Biodiversity interest is likely to be centred on the boundary tree belt, which could provide foraging for bats. Common reptiles may occur in the areas of grassland on the site periphery.</p>				
<p>EIA Screening: Necessary due to size.</p>			<p>Appropriate Assessment: Given its proximity to Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys. Contribution to the Thanet Coast SPA mitigation strategy, while required, would not alone provide sufficient mitigation.</p>	
<p>Green Infrastructure</p> <p>There are no PRow near the site and the biodiversity interest will be limited. The site lies within the GI Network area for enhancement, but development would not achieve this.</p>				

Proximity to Road Network SHLAA Score: --

The existing access is not suitable to serve up to 45 units. It would have to be made up to an adoptable standard and sight lines are probably not achievable in such close proximity to the neighbouring property. If it was moved westwards enough to get the required sight lines an access would be achievable. It is believed that the access would be within a 30mph speed limit so the requirements will be for 43m x 2.4m x 43m. This may involve some loss to the vegetation to the back of the footway but not much if it will fall within the actual sight lines. Subject to this there is no reason why a development of up to 45 units would be a problem in highway terms in this location.

Access to Services SHLAA Score: --

The site lies approximately 150m away from Sir Roger Manwood's School Grammar School and 700m away from Sandwich Station. The town centre, which has a variety of facilities including Doctors surgeries and local shops, is approximately one kilometre away.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is located on the edge of Sandwich within walking distance of the town and railway station. The site is also adjacent to a local secondary school and is very discrete, screened by dense tree-belts and the rear of houses on St George's Road. A suitable access could also be established and the site is now within Flood Zone 1.

Development would, however, introduce urban form into the countryside on the edge of Sandwich, which would be detrimental to the character of the area. Appropriate Assessment would also be required due to the close location to European wildlife designated sites.

This site should be considered for inclusion in the Submission Document.

Consideration for inclusion in the Submission Document?

Yes

Retention of existing boundary trees and vegetation (to minimise the impact of development in this area)
Appropriate Assessment

Site Code PHS020 (part of Site 1)	Address Land south east of St Andrews Catholic Church, Sandwich	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 33 (6-10 Years)	Area 1.58Ha Indicative No. of units @ 30 dph = 47
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Flat, triangular shaped site located on the south eastern edge of Sandwich. The site consists of a garden enclosed by a line of mature trees along the northern boundary and a railway line to the south. To the west there is a residential property, beyond which there is a church. The access is proposed to be north of the house and the church onto St George's Road.</p> <p>The neighbouring uses consist of residential to the west and north west, playing fields to the north and open agricultural land to the south (beyond the railway line).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The eastern boundary abuts the urban confine.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p> <p>Revised EA mapping indicates that this site is within Flood Zone 1. The SFRA indicates that when Climate Change is taken into account, Flood Zone 2 encroaches further into the site and the tip is within Flood Zone 3. Over half the site is still outside of the flood risk area.</p> <p>Subject to a site specific flood risk assessment, the site may be suitable for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. Development of the site would, however, introduce an urban form into the countryside, which would be against the grain of the development.</p> <p>Landscape Impact</p> <p>The site is currently relatively discrete although visible from school playing fields and potentially from PRow ES6 to the SW of the railway line. Development would change the character of the edge of the town in this location with an anomalous extension into the countryside. Roofscape impacts to views from the west could have an adverse visual impact.</p> <p>Biodiversity</p> <p>The adjacent railway embankment and boundary trees elsewhere will support wildlife, but this is likely to be limited to common species.</p>				
EIA Screening: Necessary due to size		Appropriate Assessment: Given its proximity to Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys. Contribution to the Thanet Coast SPA mitigation strategy, while required, would not alone provide sufficient mitigation.		
<p>Green Infrastructure</p> <p>The site is rather isolated in respect of GI. It does not lie within the GI Network for improvement. Development would be GI neutral.</p>				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The site is constrained. An acceptable vehicular access could only be created if trees can be removed to secure sight lines and if third party land could be acquired for sight line envelopes.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is located within five minutes walk to the railway station and Sir Roger Manwood's Grammar School. The nearest GP surgery is located in Cattle Market, which is approximately 10 minutes walk away (following the Town Wall route). There are also two bus services (14 & 15, hourly to Sandwich, Deal and Canterbury) along New Street, which is approximately five minutes walk away and is situated at the end of St Geroge's Road to the west of the site. The town centre is approximately 10 to 15 minutes walk away from the site.	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
The site is located within walking distance of the public transport, local school, GP and town centre. The site is also in the sequentially preferable Flood Zone 1.	
The access is, however, constrained and would require third party land to achieve suitable sight lines, which would also involve the removal of established trees. Development would also introduce an anomalous extension into the countryside, which would be highly visible in the wider landscape.	
For these reasons the site is considered to be unsuitable for further development.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL054	Address Land at Dover Road	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 28 (+15 Years)	Area 1.22Ha Indicative No. of units @ 30 dph = 36
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Flat, triangular shaped site located to the south of Sandwich consisting of an agricultural field. There are hedgerows and trees running along south eastern and western boundaries. There is a children's nursery adjacent to the site to the north (separated by a wire fence running). Further north there are residential properties and the railway line. Between the railway line and the site there is a small triangular piece of open land linked to the site (no boundary between). To the south east there are open agricultural fields. To the west there is the Dover Road, beyond which there are residential properties.</p> <p>Between Dover Road and the site there is a stream within a ditch, which runs down the entire length of the western boundary. There is one access onto the site from Dover Road over a small bridge.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The urban boundary runs down the western side of Dover Road.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>Although the SFRA indicates that the majority of the site falls within Flood Zone 3, with only the very eastern tip being within Flood Zone 2, revised mapping from the EA now indicates that it is within Flood Zone 1. The site falls outside of the Maximum Breach area, as modelled in the SFRA. The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015.</p> <p>Historic Environment</p> <p>Conservation Area and Listed Building are located on the western side of Dover Road. Development would have a detrimental impact on the setting of these historic assets through the loss of open space associated with the character of the Conservation Area. This open space is just as important to the character as the buildings themselves.</p> <p>Landscape Impact</p> <p>Currently, the site provides an interesting break between the main part of Sandwich and Deal Road extension, facing the ancient St Bart's area and provides 'an entrance' to Sandwich (more so than the more modern housing to the SW). Development would diminish this entrance and the heritage assets opposite, leading to a weakening in character of the area.</p> <p>Biodiversity</p> <p>Biodiversity is likely to be limited. The hedgerow to the south provides some connectivity between the Delf stream and the railway embankment, as does the field.</p>				
EIA Screening: Necessary due to size			Appropriate Assessment: Given its proximity to Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys. Contribution to the Thanet Coast SPA mitigation strategy, while	

	required, might not alone provide sufficient mitigation.
Green Infrastructure	
The site is not within the GI network and is unlikely to be able to offer any substantial GI through development.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The site would need to be served by a road laid out to an adopted standard. This would most likely have to bridge the stream and would involve KCC Structures. Sight lines are likely to be achievable and connections to Sandwich Town are good.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The site is adjacent to two bus stops for bus services 14 & 15, hourly to Sandwich, Deal and Canterbury. The railway station and the nearest Doctors surgery in Cattle Market are five minutes walk away. The town, with a wide range of services, is within ten minutes walk away.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
The site is located in Flood Zone 1, in a good position to access public transport and local services and a suitable access would be achievable. Development of the site would, however, have a detrimental impact on the Conservation Area through the loss of the open space that contributes to its character and through the intensification of development on the edge of the historic town.	
Consideration for inclusion in the Submission Document?	No

Site Code SAN13	Address Land adj Sandwich Technology School, Dover Road	Parish Sandwich	Overall SHLAA Score Not scored due to flood risk	Area 3.47 Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, irregular shaped site consisting of farmland. The site is contained within a high hedgerow to the east and south and residential development to the north and west. The only buildings in the site are barns, which are located on the north western boundary.</p> <p>Deal Road runs down the eastern edge of the site, beyond which there is open agricultural land. To the south west there is the Sandwich Technical College.</p>				
Policy Alignment SHLAA Score: --				
The north western boundary abuts the urban boundary.				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>Although the SFRA indicates that the site falls within Flood Zone 3, revised EA mapping now indicates that the site is within Flood Zone 1.</p> <p>Historic Environment</p> <p>The site is adjacent to three Listed Buildings along Old Dover Road (64, 66 and 78). There are no Conservation Areas adjacent to, or covering, the site. Development would not have a detrimental impact on the Listed Buildings. Development of the whole site would, however, have an impact on the character of the area, by introducing the urban form on the edge of the town. This may be mitigated by ensuring that the development did not occur on the eastern boundary with Deal Road. If this could be landscaped/treed the impact of the harsh urban form could be reduced.</p> <p>Landscape Impact</p> <p>The site lies between Sandwich Technical College and the residential housing to the south of Sandwich, therefore the problems that are often encountered with urban fringe development are far less here. With careful treatment of the frontage, such as keeping the existing hedgerow, development could be acceptable on landscape grounds, although a substantial amount of softening GI would be required.</p> <p>Biodiversity</p> <p>If redevelopment involved demolition of farm buildings, a preliminary scoping bat survey should be carried out. Otherwise biodiversity interests would be very limited, predominantly to the hedgerows.</p>				
EIA Screening: Necessary due to size.			Appropriate Assessment: Given its proximity to Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys. Contribution to the Thanet Coast SPA mitigation strategy, while required, would not alone provide sufficient mitigation.	
Green Infrastructure				
The site is not crossed by any PRow and is relatively flat, which reduces risk of flood run-off. With				

suitable SUDs linked to GI (for instance by using the existing separation between the two fields for creating of a 'green') it should be possible to develop the site in a manner sensitive to its location.

Proximity to Road Network SHLAA Score: --

The site has a current access onto Dover Road but this would not be acceptable as the main access due to the constraints at the Dover Road/Deal Road junction.

The main access should be off Deal Road (an emergency access would be acceptable off Dover Road) but it is likely that the speed limit will need to be changed from 40mph to 30mph to accommodate the new access. A Transport Assessment will also be required in this location due to the close proximity of the school and the known problems associated with the Dover Road/Deal Road junction.

Access to Services SHLAA Score: --

The site is adjacent to Sandwich Technical College and the hourly bus services 13 and 14 to Sandwich, Deal and Canterbury pass the site. There is also a farm shop opposite the site.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is located adjacent to a local school, public transport and a farm shop. Access could be achievable and, if landscaped on the eastern side, the impact of the urban form on the wider landscape and character of the area could be reduced. The site is now within Flood zone 1.

This site should be considered for inclusion.

Consideration for inclusion in the Submission Document?

Yes

- Landscaping on eastern boundary (this would reduce the number of dwellings on the site)
- Change in speed limit.
- Appropriate Assessment
- Access restricted to Deal Road, emergency access off Dover Road
- Bats

Site Code SHL065	Address Sydney Nursery, Dover Road, Sandwich	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 25.5 (Undeliverable)	Area 2 Ha Indicative No. of units @ 30 dph = 61
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Rectangular shaped site located to the south west of Sandwich. The land is used for equestrian uses and has been divided into paddocks with one barn located in the centre. The site falls gently to the south. Electricity wires cross the site diagonally from north to south.</p> <p>Dover Road is to the north of the site and the A258 is to the south of the site. There are five residential properties to the north east. The site and the properties are separated from the Sandwich urban area by the Playing fields of Sandwich Technical School. There is a line of residential properties to the south west. The residential development, John's Green, is almost opposite the site to the north west, on the far side of Dover Road (this residential area has a Settlement Confine around). Directly to the north there is open farmland. The playing fields of the Sandwich Technology School abut the eastern boundary. There is a small woodland to the south west of the site. The southern boundary consists of scrub and mature trees.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>Only the north western corner is adjacent to the confines of John's Green. The Sandwich urban boundary starts on the northern side of Dover Road, approximately 190m north east from the site.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>The SFRA indicates that the southern boundary of the site falls within Flood Zone 3 and approximately a fifth of the site to the south is within Flood Zone 2. When Climate Change is considered, the southern half the site is either in Flood Zone 2 or 3. Revised flood mapping by the EA now indicates that the site is within Flood Zone1.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. There are three Listed Buildings located at the north eastern end of the Dover Road, 500m away. There would be no impact on these assets if the site was developed. There would be a detrimental impact, however, on the setting of Sandwich through the loss of open space usually associated with the edge of rural towns. This could however, be mitigated by setting development back from the A258 and landscaping.</p> <p>Landscape Impact</p> <p>The site is reasonably well contained, visually, although there are glimpses through to the A258. With sufficient buffer landscaping on this frontage, including that boundary with the intervening field to the SE, the landscape impact would be acceptable. The boundary screening to the Technical College and the land to the SW would need to be retained.</p> <p>Biodiversity</p> <p>Biodiversity is likely to be limited as the land is predominantly horse pasture. There may be some bat foraging opportunities on boundaries and common reptiles may use the margins of the site. The buildings do not appear to be useful for wildlife.</p>				
EIA Screening: Necessary due to size.			Appropriate Assessment Given its proximity to	

	Sandwich Bay and the existing damage occurring through recreational pressure, AA would be necessary, which would include highly specific recreation surveys. Contribution to the Thanet Coast SPA mitigation strategy, while required, would not alone provide sufficient mitigation.
<p>Green Infrastructure</p> <p>The area is a loose-knit arrangement of housing and fields. A PRow ES15 runs along the SW boundary of the site, connecting through to St John's Green to a more extensive footpath network to the NW, however, there appears little opportunity for meaningful extensions to this network on site, due to the proximity of the A258. Biodiversity enhancement opportunities would exist through incorporation of SUDs. Overall the site is GI neutral.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site fronts onto Dover Road and has a current access for the equestrian use. A suitable access onto the site should be possible.</p> <p>The road is single carriageway with ample room for two cars to pass at this point but it does narrow considerably just before the junction with Deal Road at the north eastern end. The south western end of the road has been blocked and is only used as an emergency entrance for special events.</p> <p>There are, however, known problems associated with the Dover Road/Deal Road junction and development of this site would not be supported by KCC Highways.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>There is a bus stop to the south of the site, located on the A258, which can be accessed by a pathway that runs down the western side of the site. The No. 13 service runs along this route to Deal, Sandwich and Canterbury.</p> <p>Sandwich Technology School is located on Dover Road and is within five minutes walk of the site.</p> <p>The site is over one and a half kilometres away from the nearest Doctors surgery and the town centre.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although development of the site would not have a detrimental impact on the wider landscape or setting of the historic town (which would include mitigation) and the site is located within walking distance of the local college and public transport, there is a KCC Highways objection to any development that would increase traffic movements through the Dover Road / Deal Road junction, where there are known problems.</p> <p>For this reason the site is not recommended for consideration.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAN02	Address Land adjacent to 168 The Crescent, Dover Road, Sandwich	Parish Sandwich	Overall SHLAA Score 31 (11 – 15 years)	Area 0.27ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Triangular shaped site located at the far south eastern point of Sandwich where the A256 and A258 meet. The site is domed and is covered by mature trees. There are two roads that form the boundary of the site, the A256 to the south, and Dover Road to the north west. To the south, beyond the A256, there are orchards and to the north, beyond Dover Road, there is a nursery. There are residential properties to the north east (The Crescent, Dover Road) of the site.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines of John’s Green.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints Flood Risk The site falls within Flood Zone 1, which is the sequentially preferable zone for residential development. Historic Environment There are no Listed Buildings or Conservation Areas located within or adjacent to the site. There would, however, be a detrimental impact on the rural character of the approach to historic Sandwich through the loss of the ‘soft’ edge which this site contributes. Landscape Impact The landscape of the site is artificial, with a wooded bund screening noise and visual disturbance from the A258. The tree belt is subject to a TPO. Development of the site would result in the removal of the trees and possibly part of the bund. It would introduce a hard and anomalous urban edge into a rural area, degrading the character of the wider landscape. Even where trees were retained there would be pressure for major works, opening the site still further. Biodiversity There will be some biodiversity interest associated with the tree belt, but this would have some limitations due to the tree species found within the belt. Any grassland component could support common reptiles. There would appear to be insufficient biodiversity interests on the site to deter development. A drain is indicated along the southern boundary, but this is outside the site.				
EIA Screening: too small to warrant EIA			Appropriate Assessment: the number of houses proposed is likely to be too few and the site too far from European sites to give rise to a need for AA.	
Green Infrastructure The purpose of the southern drain needs to be identified, as if it were for road drainage, it probably would not be able to be used for site drainage as well, due to potential overloading. A short PRow ES16 crosses the SW corner of the site, but there is little potential for developing GI to any extent.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access				

<p>to site</p> <p>Dover Road narrows considerably where the site is located (this has been due to that fact that the access to the A256 and A258 roundabout has been blocked). This roundabout is adjacent to the site. The road would not be reopened as there are already four accesses onto the roundabout (the A256 (north and south) the A258 and the Rare Species Conservation Centre).</p> <p>There are known problems with the junction at the north eastern end of Dover Road where it meets Deal Road. KCC Highways has, however, indicated that, in this case, the addition of up to eight dwellings would only likely to have a negligible impact.</p> <p>There could also be noise and fumes from traffic on the A256, given the close proximity to a junction consisting of two busy 'A' roads.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is five minutes walk away from the bus stops on the A258 (No.13, hourly to Sandwich, Deal and Canterbury). Sandwich Technology School is located on Dover Road as well and is 430m from the site.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is located outside the flood risk area and is within walking distance of public transport and a local school, the site is located on the periphery of Sandwich. Development here would result in the introduction of a hard and anomalous urban edge into a rural area, degrading the character of the wider landscape.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS03SAN	Address Land at Rose Nursery, Dover Road, Sandwich	Parish Sandwich Town Hierarchy Rural Service Centre	Overall SHLAA Score 33 6 – 10 years	Area 1.02Ha Indicative No. of units @ 30 dph = 30 (assuming residential)
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Rectangular shaped site adjacent to John’s Green located in the far south western extremity of Sandwich, divorced from the main town in a semi-rural location. The site lies between the residential properties on John’s Green, to the north east, and the A256, to the south west. There is a wooded area (see SAN02) and further residential properties to the south east (on the opposite side of Dover Road) and open fields to the north west of the site.</p> <p>The site is currently used as a nursery and consists of glass houses and sheds together with a residential property. There is only one access onto the site although the submission suggests that a new access onto the A256 would be established.</p> <p>There is a slight change in levels but overall the site could be described as flat. The land beyond the site rises gently to the northwest. There is a managed hedge along frontage (the south eastern boundary) and hedgerow/trees along the rear and south western boundaries.</p> <p>The site has been suggested for a hotel.</p>				
Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation				
<p>The site is outside, but adjacent to, the settlement confines that surround the residential area of John’s Green.</p> <p>The site has been suggested for a new hotel. Policies DM1 (Settlement Boundaries) and DM3 (Commercial Buildings in the Rural Area) in the Core Strategy are therefore relevant. PPS4 would also be relevant as a sequential test should be considered for locating tourist accommodation outside of the town. No alternative sites have been suggested.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, a hotel would be an appropriate use within this flood zone.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas in the vicinity of the site. There are three Listed Buildings at the north eastern end of Dover Road (just over 700m away). Whilst development will not impact on these Historic Assets, there is concern that the ‘soft’ urban edge would be lost through the redevelopment of this site.</p> <p>Landscape Impact</p> <p>The site is screened by mature trees and scrub to the south west, is located at the bottom of a gentle hill and there is screening by residential development to the north west. The landscape impact will be dependent upon the nature of the proposed development. Housing may be well screened whereas a hotel, by its commercial nature, will have an adverse landscape impact – particularly if access onto the A256 is contemplated.</p> <p>Biodiversity</p> <p>The current biodiversity will be quite limited. There is a ditch to the SW boundary of the site and this would need investigating in respect of water voles; however, biodiversity will not be a determining factor at this site.</p>				

EIA Screening: necessary at 30dph	Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy, while required, might not alone provide sufficient mitigation. Screening for AA would be necessary.
<p>Green Infrastructure</p> <p>The site is isolated, except for the ditch, cannot be expected to contribute to the wider GI network as it is relatively small in area.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>There is currently only one access and this is onto Dover Road. The submission suggests that a new access would be established onto the A256. Whilst the geometry of the suggested new junction accords with current standards there is concern that vehicles waiting to turn right during peak times will take chances due to the sufficient lack of gaps. There is also concern that vehicles approaching the roundabout from Dover direction tend not to reduce speeds (due to clear visibility of the A258) when entering the roundabout to turn left. The reduced forward visibility on the South East Water Gardens bend would not allow an approaching vehicle to be aware of traffic that may be queuing or slowing in the right hand turn lane to gain access to the new hotel. Those vehicles that may have taken the roundabout at speed are likely to overrun the lane and bridge the right hand turn lane, which may result in a risk of crashes.</p> <p>There is also concern that guests of the hotel may try and walk to the nearest attractions, South East Water Gardens & Rare Species Conservation Centre, but there are no pedestrian safeguards along the A256.</p> <p>The new junction would not, therefore, be suitable. The former access onto the roundabout from Dover Road could not be reopened as there are already four accesses onto the roundabout (the A256 (north and south) the A258 and the South East Water Gardens / Rare Species Conservation Centre). There are also known problems with the junction of Dover Road and Deal Road, to the north east. KCC Highways would not support any development that would significantly increase traffic movements through this junction.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is five minutes walk away from the bus stops on the A258 (No.13, hourly to Sandwich, Deal and Canterbury). Sandwich Technology School is located on Dover Road as well and is approximate 430m from the site.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>The site has been put forward for a hotel. Current Government policies (PPS4) indicate that town centre uses, such as hotels, should be subject to a sequential test and demonstrate that there are no suitable alternative sites within the town. No alternative sites have been suggested.</p> <p>Notwithstanding this lack of information, there is no suitable access onto the site. KCC Highways have concerns with the proposed access from the A258 and to the use of Dover Road (due to the known problems with the junction with Deal Road). Furthermore, development would erode the rural character in this area on the approach to Sandwich.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL058	Address Land at Beller's Wood Nursery, Sandwich Road, Sandwich	Parish Sandwich	Overall SHLAA Score 34 (6-10 Years)	Area 1.47Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Irregular shaped site located on the roundabout where the A256 Dover/Thanet meets the A258 from Deal. The site consists of a gravel parking area, glass houses and scrub and it is contained within a hedgerow. It is divorced from Sandwich.</p> <p>There are two residential properties (Beller's Bush) to the north of the site. There is a water garden centre to the south of the site. There are fields to the north west and south west of the site. The A256 is to the south and to the east of the site. The site has been suggested for employment.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The confines of Johns Green are approximately 150m from the site. The A256 also separates the site from the confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The SFRA indicates that the majority of the site falls within Flood Zone 2. When Climate Change is considered, the site falls within Zones 2 and 3. Revised mapping by the EA, however, indicates that this site is now within Flood Zone 1.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas located in within or adjacent to the site. Development would, however, result in the urbanisation of the countryside on the approach to the historic town of Sandwich.</p> <p>Landscape Impact</p> <p>Development of this site would result in an incongruous landscape character change in a rural area. The site is currently well contained by vegetation, but there would pressure to reduce this, resulting in an adverse visual impact on the surrounding rural landscape.</p> <p>Biodiversity</p> <p>There will be some biodiversity interest associated with the hedge lines and scrub. Furthermore, there is a loose connectivity via rough grassland and ditches to this site which suggests that the dense vegetation on the site might be of significance for bats. However, this need not preclude development.</p>				
EIA Screening: Necessary due to size			Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy, while required, might not alone provide sufficient mitigation. Screening for AA would be necessary.	
<p>Green Infrastructure</p> <p>Although the site is predominantly isolated, two PRoW (footpath EE226 and Bridleway ES8A), both running to the NW meet at the access onto the A256, providing for wider recreational walking activity. There does not appear to be any opportunity for biodiversity enhancement.</p>				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

The access to the site onto the roundabout is extremely substandard in terms of visibility and any increase in traffic movements from this access, in its current form, would not be supported by KCC Highways. There are no pedestrian connections to this site or crossing facilities over the A256 to connect to Sandwich Town and pedestrians attempting to cross in this location would be hazardous to all road users due to lack of forward visibility at the roundabout. KCC Highways would not recommend this site on this basis. In addition, the level of housing proposed in addition to the existing uses on the site would require an alternative emergency access, which is unlikely to be able to be provided safely.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk
Five minutes walk from bus stop on A258 but no footways to it from the site. Pedestrians would have to cross the A256.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site would not be suitable for employment or residential development. The site is divorced from the town and is separated by the A256. Development would have a detrimental impact on the wider landscape and a suitable access would not be achievable. The only positive aspect of the site is that it is close to bus stops, but there are no footpaths or safe crossing points to them.

Consideration for inclusion in the Submission Document?

No

Site Code PHS017 (old ref: Site 4)	Address Land to the east of Sandwich including Kumar Nursery, Sandwich	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 37 (0-5 Years)	Area 15.4 Ha Indicative No. of units @ 30 dph = 460
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped, flat, site, located on the south eastern edge of Sandwich. The site consists of agricultural land, a residential property to the west of the site (the Orchards) and Kumor Nursery to the east (this site has also been suggested separately). The property and the nursery are enclosed behind a hedge. The site is located between Sandwich Junior School, to the north east, and residential properties of John's Green, to the South West. There are agricultural fields to the north west. Residential properties and Dover Road form the south eastern boundary.</p> <p>The site was originally part of an area of search by the Council, which covered the whole area between Dover Road and Woodnesborough Road.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines. The area has, however, been identified as a 'broad location for urban expansion' in the adopted Core Strategy.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1 which would be sequentially preferable for residential development.</p> <p>Historic Environment</p> <p>At present the route into Sandwich along Woodnesborough Road creates a general impression of a gradual transition from countryside to town. Development would urbanise the edge of Sandwich.</p> <p>Whilst there are no Listed Buildings close to the site, there are three located along the northern end of Dover Road. Development would have little impact on these. No specific urban design issues apart from views to Woodnesborough Church.</p> <p>Landscape Impact</p> <p>The land is slightly higher than neighbouring fields and falls gently to Dover Road. Development of the whole this site would have a detrimental impact on the wider landscape and setting of Sandwich.</p> <p>Kumor Nurseries, to the north east of the site, are rather indistinct and, due to the presence of existing housing along Dover Road, could accommodate further housing with without impacting on the landscape.</p> <p>Biodiversity</p> <p>No site specific issues raised.</p>				
EIA Screening: Necessary due to size			Appropriate Assessment: The development of a site this large could result in significant impacts at Sandwich Bay, where local recreational impacts are known to be causing damage to the SPA/Ramsar interest. In order to pursue this site, it is considered that the DPD HRA may	

	<p>have to consider this site in detail, including in-combination impacts with other sites. In addition, contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation.</p>
<p>Green Infrastructure</p> <p>Along the NW boundary, a PRow footpath, ES8 runs. In respect of GI, this is a site in which there would have to be considerable investment to provide not only OS together with SUDs (to ameliorate loss of natural absorption and reduce surface water flood risk), but also provision of the necessary transition from urban to rural form.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Dover Road is unsuitable for handling traffic generated from the whole development area or from a smaller area such as the nurseries site. The southern end the road has been blocked off and, at the north eastern end, it is fairly narrow with a poor junction onto Deal Road, which has known problems. Reopening the access to Dover Road from the A256 roundabout would not be possible. The nursery access could be used as an emergency access.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is located five minutes walk away from a bus stop (13 hourly to Canterbury and Sandwich) and the local primary school. The site is also ten minutes walk away from the railway station, the Doctors surgery and secondary school. The local shops are just over ten minutes walk away.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Development of the whole site would not be acceptable due to the detrimental impact on the landscape and issues relating to the size of the development and the wider road network, particularly Dover Road/Deal Road junction. There is, however, some development potential on a smaller area of the site, particularly the nursery and land adjacent as this area is more discrete. Access would, however, have to be through the neighbouring site (PHS018)</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>Yes</p>

Site Code PHS016 (Site 3)	Address Land between A256 and Woodnesborough Road, Sandwich	Parish Sandwich	Overall SHLAA Score 31.5 (11-15 Years)	Area 18.7 Ha Indicative No. of units @ 30 dph = 564
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large irregular shaped site consisting of an expanse of arable land bounded to the north by Woodnesborough Road (and residential properties along that road), to the east by agricultural fields (see PHS017), to the west by the A256 and to the south by agricultural fields and residential properties in John's Green. There is a thin strip of land, which runs from the main bulk of the site south eastwards along the western boundary (following the line of the A256), which includes Rose Nursery on Dover Road. The site gently falls to the south east.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines of John's Green to the south and the eastern confines of Sandwich to the north.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The majority of the site falls within Flood Zone 1. Only a very small area to the north east of the site (with the boundary of PHS018) is within Flood Zone 2. When Climate Change is considered Flood Zone 2 encroaches further into the site. There is also a small element of Flood Zone 3 in the north eastern point. The site is completely outside of the Maximum Breach area. This situation could be improved if the Environment Agency plans for new flood defences are built (2015).</p>				
<p>Historic Environment</p> <p>If the site was developed, the urban form would be taken up to the line of the A256 this would urbanise the edge of the historic rural town of Sandwich. Woodnesborough Road, at present, creates a general impression of gradual transition from countryside to town. If this site was developed, this character would be lost. Views of Woodnesborough Church may also be lost.</p>				
<p>Landscape Impact</p> <p>This site is removed from the urban area and despite the tongue of housing (John's Green), it has a distinct countryside ambience. Development of the bulk of the area to the north, which has very little screening and is slightly higher than the surrounding area, would have a highly negative impact on the landscape. The smaller strip between the A256 and the properties of John's Green is well screened by verge side planting and houses.</p>				
<p>Biodiversity</p> <p>No specific issues raised.</p>				
EIA Screening: Essential due to size.			Appropriate Assessment: The development of a site this large could result in significant impacts at Sandwich Bay, where local recreational impacts are known to be causing damage to the SPA/Ramsar interest. In order to pursue this site, it is considered that the DPD HRA may	

	<p>have to consider this site in detail, including in-combination impacts with other sites. In addition, contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation.</p>
<p>Green Infrastructure</p> <p>The boundaries have footpaths PRoW ES11 to the SW and ES8 to the SE, otherwise there are no GI constraints. In respect of GI, this is a site in which there would have to be considerable investment to provide not only OS together with SUDs (to ameliorate loss of natural absorption and reduce surface water flood risk), but also provision of the necessary transition from urban to rural form.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>With regard to the north of the site, access off Woodnesborough Road would be acceptable. There would, however, need to be consideration of any impacts of additional road traffic on other road junctions away from the site within Sandwich.</p> <p>Dover Road is unsuitable for handling traffic generated from large scale development. The southern end the road has been blocked off and at the northern end it is fairly narrow with a poor junction onto Deal Road and this has known problems. Reopening the access to Dover Road from the A256 roundabout would not be acceptable.</p> <p>A new access onto the Bypass would not be acceptable.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The site is within five minutes walk of a bus stop (13a, hourly to Canterbury and Sandwich) and is ten minutes walk from the local primary school and railway station.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Development of the whole site would not be suitable as this would have a detrimental impact on the wider landscape and setting of the historic town of Sandwich. A small section of the site (adjacent to John's Green) is more discrete and would not have an impact on the wider landscape. This area, however, only has an access onto Dover Road, which is not suitable due to known problems with the junction with Deal Road.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code PHS018 (Site 2 & including SAN 5 & 11)	Address Black Lane, Sandwich	Parish Sandwich	Overall SHLAA Score 35 (6-10 Years)	Area 6.67 Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped site consisting of an arable land, allotments and a residential property bounded to the north by properties along St Bart's Road, to the east by a school, to the south and west by the agricultural fields (PHS016).				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site is adjacent to the settlement confines. The area has, however, been identified as a 'broad location for urban expansion' in the adopted Core Strategy.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The majority of the site is within the sequentially preferable Flood Zone 1. Only the very western tip is within flood Zone 2. When Climate Change is considered, the majority of the site is still within Flood Zone 1 but Zones 2 and 3 have encroached slightly further into the site at the eastern tip. Flood Zone 2 now follows the south western boundary (with PHS016). The site is completely outside of modelled Maximum Breach area. This situation would be improved with the construction of new flood defences proposed by the Environment Agency.				
Historic Environment No specific urban design issues apart from views to Woodnesborough Church. At present the route into Sandwich along Woodnesborough Road creates a general impression of a gradual transition from countryside to town. Any new development would need to ensure that this transitional character remains.				
Landscape Impact The site is comprises a traditional transition between town and countryside with larger properties in sizeable plots, allotments and an arable field. Visually the site is quite enclosed. It has a Hawthorn hedge to the SW, a roadside hedge to the north west and housing to the north east. To the south east there is a school playing field, arable fields and the more distant properties on Old Dover Road. There are allotments within the area which appear to be reasonably well used. These comprise protected GI (CP 7 refers).				
Biodiversity The site comprises a mixture of land uses and vegetation which would suggest there would be some biodiversity interest, including common reptiles. It is also noted that OS mapping indicates a pond and a short ditch as being present. Prior to development a suite of biodiversity surveys would be necessary, including those for Great Crested Newt and bats (due to the high potential for foraging habitat and presence of older buildings on the Woodnesborough Road side of the site).				

EIA Screening: Essential due to size.	Appropriate Assessment: The development of a site this large could result in significant impacts at Sandwich Bay, where local recreational impacts are known to be causing damage to the SPA/Ramsar interest. In order to pursue this site, it is considered that the DPD HRA may have to consider this site in detail, including in-combination impacts with other sites. In addition, contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation.
<p>Green Infrastructure</p> <p>The allotments are protected under Core Strategy Policy CP 7. These are also statutory and would require retention or replacing. Black Lane is a byway open to all traffic and the SE boundary of the site is PRoW ES8. this is a site in which there would have to be considerable investment to provide not only OS, including replacement allotments as necessary, together with SUDs (to ameliorate loss of natural absorption and reduce surface water flood risk), but also provision of the necessary transition from urban to rural form.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access off Woodnesborough Road would be acceptable. Single access could be achieved on corner of the site, approximately where Black Lane track is. This would support 50 dwellings. For up to 100 dwellings a second/emergency access would be required but it would be difficult to locate a secondary access onto Woodnesborough Road due to junction spacing issues. It would be possible to locate this off St Bart’s Road.</p> <p>There would, however, need to be consideration of any impacts of additional road traffic on other road junctions away from the site within Sandwich. A Travel Plan and Travel Assessment would need to be undertaken.</p> <p>A footpath along Woodnesborough Road would also be required from the site to the existing bus stop.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site lies adjacent to Sandwich Junior School and is close to the Sandwich Technology School. The site is also within five minutes walk of the nearest bus stop (13a, hourly to Sandwich and Canterbury).</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>There is development potential on the site. This area would not have a detrimental impact on the landscape. Any development would have to either replace or retain the allotments. Total amount of development would be limited to 100 units (assuming two accesses are achievable) and exclude the statutory allotments.</p>	
<p>Consideration for inclusion in the Submission Document? Yes</p> <p>Access; Allotments</p>	

Site Code PHS019 (Site 5 & including SAN18)	Address Land to the north of Woodnesborough Road	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 33.5 (6-10 Years)	Area 4.17 Ha Indicative No. of units @ 30 dph = 110
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
Description of Site Irregular shaped site located on the eastern edge of Sandwich. The site is located north of residential properties along Woodnesborough Road and Sunnyside Gardens and to the east of the A256. To the north and east of the site there are open fields. Poulders Road (a track) dissects the overall site, with approximately two thirds of the site to the south west consisting of open agricultural land (Poulders Gardens) and the remaining third consisting of enclosed (within a hedgerow) fields to the north east (Sunnyside Nurseries). Poulders Gardens falls from the southern boundary. Sunnyside Nurseries are, however, higher than the neighbouring properties and there is a change of levels between this site and the residential properties in Sunnyside Gardens to the south. There are farm buildings adjacent to Poulders Road and the residential properties. Two Public Rights of Way cross the site. There is a another track between Sunnyside Nurseries and Sunnyside Gardens, which runs from Poulders Lane to Woodnesborough Road.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines, which run along the southern boundary.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints Flood Risk Approximately half (from the northern boundary) of the overall site falls within Flood Zone 2. The area previously identified in the Preferred Options Document (to the north east) followed the line of flood risk and is within Flood Zone 1. When Climate Change is considered, the majority of the site falls within Flood Zone 3, with only the higher land adjacent to Poulders Gardens within Flood Zone 1. Only the most north eastern tip of the site falls within the Maximum Breach area, as modelled in the Council's SFRA. This situation should improve with the new flood defences proposed by the Environment Agency (likely to be completed in 2015). Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. Development would not have a detrimental impact on the setting of Sandwich as this is not on a main route into the town. Landscape Impact The south western part of the site is particularly visible from the Sandwich Bypass. This area is on sloping ground, which drops towards the north. The site also lies lower than the existing houses in Poulders Gardens, which are set on a ridge. The ribbon development along Woodnesborough Road presents a harsh boundary with the countryside beyond and there may be a minor benefit in breaking the visual impact of this. From a landscape point of view, the only developable area is the north east part of the site (Sunnyside Nurseries). This is relatively well screened from the A256 by virtue of distance and tree/scrub cover. This area is also visually contained by high conifer hedging. However, this could be subject to pressure to be reduced, possibly utilising high hedges legislation. Biodiversity No specific issues raised as the opportunities for native wildlife are very restricted.				

<p>EIA Screening: Necessary, due to size.</p>	<p>Appropriate Assessment: The development of a site this large could result in significant impacts at Sandwich Bay, where local recreational impacts are known to be causing damage to the SPA/Ramsar interest. In order to pursue this site, it is considered that the DPD HRA may have to consider this site in detail, including in-combination impacts with other sites. However, if the site is limited to 37 dwellings, due to highways requirements, this would lessen the AA concerns. However, contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation.</p>
<p>Green Infrastructure</p> <p>Running along the outside of part of the SW boundary is restricted Byway ES12A, while public footpath ES11 along the SE boundary. There is little potential for developing recreational routes; an equipped play area, protected under CS Policy CP7 was originally included in the site and lies within 120m of the site, accessible from ES11. There may potential for enhancing biodiversity through the use of SUDs.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Initial assessment concluded that the only acceptable access from a highways perspective to this site is via Sunnyside Gardens, which would limit the capacity to 50 dwellings (net 37).</p> <p>There may, however, be an alternative option, which would utilise the track that runs between No.123 and the vacant land. This could be used as a means of access to the site, either as a principle or secondary access. The principle access would need to be laid out to an adoptable standard and may require additional width, above that of the existing track surface to meet current requirements. This additional land would probably be in third party ownership.</p> <p>This could increase the number of dwellings but this would require a Travel Assessment and Travel Plan for the wider road network before development could commence.</p>	
<p>Access to Services SHLAA Score: 4.0 – Site within 10 minutes walk of rail station, GP surgery and school</p> <p>The site is within walking distance of Sandwich Junior School and the Sandwich Technology School. Two bus routes to the centre of Sandwich also pass near to the site (13a, hourly to Canterbury and Sandwich and 87/88 hourly to Dover and Sandwich).</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located within walking distance of local facilities and bus stops and an access should be achievable. The south western part of the site would not be suitable for development due to the detrimental impact on the wider landscape as this is particularly visible. The remaining north eastern part would have less of an impact as this is surrounded by a hedge. This hedge may, however, be removed at a later date, opening up the development.</p> <p>Approximately half of the site is also within Flood Zone 2, and whilst this could improve, alternative site should be considered in the first instance.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAND14	Address Land between 127 ad 131 Woodnesborough Road	Parish Sandwich	Overall SHLAA Score Not scored as the site is too small	Area 0.1 ha
		Hierarchy Rural Service Centre	Indicative No. of units @ 30 dph = 3	
Current Use SHLAA Score: --				
Description of Site Rectangular site situated on the western side of Sandwich lying within a predominantly residential area. The site is level, laid to grass with a number of fruit trees to the western half. There are no buildings on the site apart from a couple of small storage sheds. To the north west there is open agricultural land.				
Policy Alignment SHLAA Score: -- The site is within the settlement confines and has been identified as open space on the Proposals Map.				
Physical Constraints SHLAA Score: --				
Flood Risk Although the District's SFRA indicates that the site falls within Flood Zone 3, revised EA flood mapping indicates that it is now within flood zone 2. The site also falls within the area of Maximum Breach, as modelled in the SFRA. Alternative sites should be considered for residential development.				
Historic Environment There are no listed buildings or conservation areas near to the site.				
Landscape Impact There would be no significant landscape impact if this site was to be developed as it is located within the urban form.				
Biodiversity Potential for common reptiles, which would not be a constraint to development.				
EIA Screening: too small to need consideration			Appropriate Assessment: too small to need consideration	
Green Infrastructure The site has been identified as open space but the site is small and would only make a minor contribution to GI.				
Proximity to Road Network SHLAA Score: -- The site fronts onto Woodnesborough Road but there is no vehicular access. Kent Highways has indicated that there are no particular issues relating to an access off Woodnesborough Road provided that there is on site parking and turning. There is also a possibility of a rear access.				
Access to Services SHLAA Score: -- The site is located approximately 800m from the town centre. There is also a bus stop adjacent to the site which serves the hourly 87/88 bus route to Dover and Sandwich centres. The local school is approximately 400m away.				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis Although the site is within the settlement confines, located close to public transport, within walking distance of local facilities and development would not have a detrimental impact on heritage assets or the wider landscape, the site is located within Flood Zone 3 and within the Maximum Breach area. Alternative sites should, therefore, be considered. The site is also identified as open space.				

Furthermore, the site would only provide three dwellings and would be too small to be allocated.

Consideration for inclusion in the Submission Document?

No

Site Code SAN15	Address Land to the rear of 19-117 Woodnesborough Road	Parish Sandwich	Overall SHLAA Score Not scored due to Flood Risk	Area 2.9 Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Flat, irregular shaped site located on the western edge of Sandwich. The site consists of light industrial units to the east of the site and a telecommunications mast. The majority of the site is, however, grassland. There is a tall hedgerow that separates the light industrial with the grassland. There are a number of trees around the boundary line, particularly in the southern corner.</p> <p>The eastern part of the site lies adjacent to the existing residential properties (Alexander Close). There are fields to the west and a static caravan park & industrial units to the north.</p>				
Policy Alignment SHLAA Score: --				
<p>The site is outside the settlement confines but the eastern boundary abuts them. A large proportion of the grassland has been identified as open space and would be subject to Policy DM25 in the Core Strategy.</p>				
Physical Constraints SHLAA Score: --				
<p>The SFRA indicates that the majority of the site falls within Flood Zone 3 and within the area of Maximum Breach. The only exception is the area of land where the industrial units are located. This is outside the Maximum Breach area. Amended EA flood mapping, however, now indicates that it is within Flood Zone 2. This situation should improve with the new flood defences proposed by the Environment Agency (likely to be completed in 2015).</p>				
Historic Environment				
<p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Conservation Area (Walled Town) is approximately 130m away. Development would not have a detrimental impact on these Heritage Assets.</p>				
Landscape Impact				
<p>The area is flat, dissected and enclosed by evergreen tree lines and ditches. The character is, consequently, quite weak. The site contains some light industrial units that the trees screen from the wider countryside, but the majority of the area is exposed with long views to the northwest. Development would be seen in the context of the urban backdrop, although the rural/urban interface would require sensitive design to avoid creating a harsh boundary.</p>				
Biodiversity				
<p>The site could hold a significant biodiversity interest, being bound on two sides by ditches that connect to the South Polders ditch system, with boundary trees and rough grassland. There is a flight pond within 300m of the site. Surveys for protected species – Great Crested Newts and Water Voles, as well as common reptiles would be necessary. The vegetation may also provide foraging for bats. Any development would need to ensure the protection, if not enhancement of the ditch water quality.</p>				
EIA Screening: Necessary due to size.			Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation, especially if taken in-combination with other sites.	
Green Infrastructure				

PRoW ES9 runs along the NE boundary, separating the site from the neighbouring caravan park; there is an equipped play area within 500m. Development on the site appears to be severely limited due to flood risk. However, if this were alleviated, SUDs would necessary to help maintain the ditch network. There is a gap between ES11 and the site, likewise for ES9. Development should attempt to provide link through the site to these two footpaths to increase the recreational walking opportunities. Biodiversity surveys should inform any GI development.

Proximity to Road Network SHLAA Score: --

If access was being sought from Woodnesborough Road using the existing access serving the industrial/retail units then a carriageway width of 4.8m will be required with 6m radii at its junction with Woodnesborough Road. The carriageway width could reduce down to single track with sufficient space to allow two vehicles to pass every 40m and these spaces must be intervisible. Pedestrian safeguarding will be required either by way of footways or shared surfaces. Up to 50 dwellings can be served from a non-through road but above this number a secondary emergency access will be required. It is unlikely that the gap between the properties fronting Woodnesborough Road would be wide enough to support this number of dwellings.

The access serving the caravan park is probably suitable although the footway is substandard in width. It should also be noted that this is a private road and does not form part of the adopted highway. Visibility is hindered from the junction of the private road (onto Woodnesborough Road) due to parked vehicles. Some mitigation may be required to this junction in order to accommodate additional traffic movements.

Access to Services SHLAA Score: --

The site is adjacent to bus stops on Woodensborough Road, which serve the hourly 87/88 bus route to Dover and Sandwich centre. The site is approximately 400m away from the nearest Doctors Surgery and approximately 300m from a supermarket. The town centre (with a variety of facilities) is a little further away (approximately 500-600m away).

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Although the site is located within walking distance of local facilities there are concerns about the access to the site, particularly the access onto Woodnesborough Road between the residential properties and the junction of the private road. The site is also within Flood Zone 2 and within the Maximum Breach area, and whist it this situation may improve in the long term, alternative sites should be considered.

Consideration for inclusion in the Submission Document?

No

Site Code SAN01	Address Land to the rear of 19 – 37 Woodnesborough Road	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score Not scored – within flood risk and too small.	Area 0.05 Ha Indicative No. of units @ 30 dph = 1
Current Use SHLAA Score: --				
Description of Site Small rectangular site located between the existing properties along Woodnesborough Road and the more recent properties that form Alexander Close. The northern edge fronts the access road that serves Alexander Close and the Caravan Park (located to the north west of the site). Directly north there are small industrial units (please see SHL046). The site is flat and consists of vacant land with trees around the boundary.				
Policy Alignment SHLAA Score: -- The site is outside of the Settlement Confines, but the eastern boundary abuts them.				
Physical Constraints SHLAA Score: -- Flood Risk The site falls within Flood Zone 2. Alternative sites should therefore be considered. The site, however, does not fall within the area of Maximum Breach, as modelled in the SFRA. If there are no alternative sites within Flood Zones 1 then this site may be considered possible for development. Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Conservation Area (Walled Town) is approximately 120m away. Development would not have an impact on these Heritage Assets. Landscape Impact None Biodiversity Would be limited to the boundary trees, but there would be pressure to reduce those.				
EIA Screening: too small to need consideration		Appropriate Assessment: too small to need consideration		
Green Infrastructure Too small to need evaluation.				
Proximity to Road Network SHLAA Score: -- The site fronts onto the access road, which serves Alexander Road, the Caravan Park and the industrial units. There are no highway concerns for one dwelling.				
Access to Services SHLAA Score: -- There are bus stops on Woodensborough Road, which serve the hourly 87/88 bus route to Dover and Sandwich centre. The site is approximately 400m away from the nearest Doctors Surgery and approximately 300m from a supermarket. The town centre (with a variety of facilities) is a little further away (approximately 500-600m away).				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis				

As a rule the District Council only allocates land that can accommodate approximately 5 dwellings. This site is, therefore too small to be allocated but the confines could be amended to include the site to enable development. The principle issue relating to this site is that it is within Flood Zone 2 and, whilst this could improve through the proposals by the Environment Agency, alternative sites should be considered.

Consideration for inclusion in the Submission Document?

No

Site Code SHL046 (SAN08 & SAN09)	Address Land at 17 Woodnesborough Road, Sandwich	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score 34.5 (6-10 Years)	Area 0.27Ha Indicative No. of units @ 30 dph = 22
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>Irregular shaped site comprising of commercial premises in multiple ownership and undeveloped greenfield land to the north. Each commercial unit is individual in design, and some of the units are vacant. In general the premises appear to be well maintained. A residential property, 17 Woodnesborough Road, has also been included within the site.</p> <p>The surrounding uses consist a railway (and which runs along the northern boundary), a static caravan/leisure park to the west and residential to the south. Beyond the railway, to the north, there is a cricket field. Telephone wires cross the site.</p> <p>SAN08 only covers the area with the industrial units. SAN09 covers the whole area.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation 17 Woodnesborough Road is within the settlement confines. The remaining site area is outside of the confines. Part of the site is also employment land and would have to be considered against Adopted Core Strategy Policy DM2.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 3 and within the area of Maximum Breach. Although revised EA mapping has reduced the risk, this site is still within Flood Zone 3. Alternative sites should be considered for residential development. The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015. This should reduce the flood risk in Sandwich.</p> <p>Historic Environment</p> <p>There are no Listed Buildings within or adjacent to the site. Walled Town Sandwich Conservation Area runs along the opposite side of the railway line, so is only approximately 20m away from the nearest point. Development would have little impact due to the railway line and natural screening.</p> <p>Landscape Impact</p> <p>There would be no significant landscape impact in development of SAN08. Extending development to cover SAN09 would increase the potential of inter-visibility with historic Sandwich</p> <p>Biodiversity</p> <p>The site is bounded to the NE by a ditch that connects with the South Polders system and this would need assessing for water voles and Great Crested Newts. Common reptile and bat surveys would be required, together with a Phase 1 assessment of the grassland.</p>				
EIA Screening: required due to size			Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation, especially if taken in-combination with other sites.	
<p>Green Infrastructure</p> <p>PRoW ES9 runs along the southern boundary of the site, giving access for recreational walking across</p>				

South Polders. The site is too small to consider any GI enhancement beyond SUDs. There may be contamination issues associated with the commercial development.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is currently accessed via a private road, so any development on the site would not be able to have adoptable roads. At present there are substandard walking and cycling connections. The site lies at junction, which is poor because of parked cars and this would require a traffic regulation order.

If SAD08 was considered in isolation of SHL046, this site would require a new access point either off the private road serving the caravan park or off Woodnesborough Road. An access point within the site boundary would conflict with the existing junction movements and could not be supported by Kent Highways.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

There are bus stops along Woodnesborough Road, which serve the hourly 87/88 bus route to Dover and Sandwich centre. The Doctors surgery is located approximately 320m away from the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although the site is within five minutes walk of local facilities and there would not be a detrimental impact on the wider landscape or heritage assets, the site falls within Flood Zone 3 and within the area of Maximum Breach. Alternative sites should, therefore, be considered in the first instance.

Development of the site would also result in the loss of valuable employment land.

Consideration for inclusion in the Submission Document?

No

Site Code NS01SAN	Address Land at Jubilee Road, Sandwich	Parish Sandwich Town Hierarchy Rural Service Centre	Overall SHLAA Score 32 6-10 years	Area 0.24Ha Indicative No. of units @ 30 dph = 7
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Flat, rectangular, site located within Sandwich, currently used as informal grassed open space. The boundary treatment is varied consisting of mature tree and scrub screening along the north eastern boundary with the railway, hedgerow along the south eastern boundary and chain link fencing along the south western boundary. There is metal fencing across the north western boundary. There is also a small football goal located on the site.</p> <p>The site is adjacent to modern two and three storey residential properties (to the south west), a railway line (to the north east) and community facilities and associated parking (north west). There appears to be gardens or scrub land beyond the hedge to the south east.</p>				
Policy Alignment SHLAA Score: 7.0 - Sites within development envelope (settlement boundaries) with no designation				
<p>The site is within the settlement confines and the area has not been identified as open space on the Dover District Proposals Map. Policy DM21 still, however, protects open spaces even if they are not identified on the Proposals Map. The Council is also currently working on open space and playing pitch standards. The site should be retained until these standards can be used.</p>				
Physical Constraints SHLAA Score: 2.0 - Within or partially within Flood Zone 3				
<p>Flood Risk</p> <p>The site falls within Flood Zone 3 in the SFRA. The site is, however, outside of the area of Maximum Breach. Revised EA flood mapping indicates that this site is now within Flood Zone 1, but on the edge of Flood Zone 2. The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015. This should reduce the flood risk in Sandwich.</p> <p>Historic Environment</p> <p>The immediate urban area consists of modern development. The site is close to the Walled Town Sandwich Conservation Area, which covers land on the northern side of the railway line and there are Listed Buildings on Moat Sole (approximately 100m to the north). The Scheduled Monument, (Sandwich Town Walls), is located within the Conservation Area, again north of the railway line.</p> <p>There are mature trees on both sides of the railway line and these provide heavy screening between the site and the historic assets. It is, therefore, unlikely that development of this site would have a detrimental impact on the Historic environment.</p> <p>Landscape Impact</p> <p>The site is very much enclosed by development to the SW and the railway line with its associated vegetation to the NE. Even without the railway vegetation, there is further tree cover to the NE, and it is not considered that there would be an overriding adverse landscape impact were this site to be developed.</p> <p>Biodiversity</p> <p>There will be some biodiversity associated with the railway, which could also utilise the grassland. Common reptiles are likely to be present.</p>				

EIA Screening: too small to be required	Appropriate Assessment: too small to be required
<p>Green Infrastructure</p> <p>The site currently provides some informal green space for the housing to the south and its value as such needs to be assessed. It may be possible to enhance the open space further to the east, although this poor in terms of connectivity and has a current importance in screening development off Fordwich Place from historic Sandwich.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>The site fronts Jubilee Road in 30mph speed limit. Good access potential with footways on both sides of the carriageway and no traffic regulation orders.</p>	
<p>Access to Services SHLAA Score: 7.0 – Within 5 minutes walk of rail station, GP surgery and school</p> <p>The railway station is located to the south east. The GP surgery is located to the north in Cattle Market. Sandwich County Junior School is located to the south.</p> <p>The site is adjacent to a children’s playgroup and a local club. There is a superstore located to the north, which would also be within five minute walk. Bus route 87/88 runs along Woodnesborough Road.</p>	
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>	
<p>Ownership SHLAA Score: 5.0 - Single Public Sector Ownership</p>	
<p>Analysis</p> <p>Although the site is located close to local facilities and development would not have a detrimental impact on the historic environment or wider landscape and the existing highway could accommodate traffic generated by development, the site is open space and is protected under Core Strategy Policy DM21. The Council is currently working on open space and playing pitch standards so the site should be retained as this use until these standards can be used.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAN14	Address Land to the rear of 1 to 13 Woodnesborough Road	Parish Sandwich	Overall SHLAA Score Not scored due to flood risk	Area 0.63Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Irregular shaped site located on the western side of Sandwich. The site is flat and consists of one building (a depot) located in the middle of the site and area for a gantry to the north. The remaining land appears to be scrub/grassland. There is a line of trees around almost all the boundary. The exception is the short southern boundary with the properties on Woodnesborough Road, which appears to consist of wooden fencing. The access is between 3 and 5 Woodnesborough Road.</p> <p>The railway line runs up the south western edge and there is a river running down the eastern side of the site. Beyond the river there is the Medieval Town Wall (The Butts) open space, the local supermarket and parking area. To the north west there is a cricket field.</p>				
Policy Alignment SHLAA Score: --				
The site is outside of the Urban Boundary. Only the southern boundary abuts these.				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site falls within Flood Zone 3 and within the area of Maximum Breach in the SFRA. Revised EA flood mapping indicates that the site is still within Flood zone 3. Alternative sites should be considered for residential development.</p> <p>The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015. This should reduce the flood risk in Sandwich in the long term.</p> <p>Historic Environment</p> <p>The site falls within the Walled Town Sandwich Conservation Area and is adjacent (only the river separates it) to the Town Wall Ancient Monument. This open area is a section of the open space that follows the line of the Medieval Town Wall around the majority of Sandwich and must be retained. Development would have a detrimental impact on the character and setting of the Ancient Monument by the loss of this open space.</p> <p>Landscape Impact</p> <p>Currently, the site presents a negative visual impact to the surrounds, due to dereliction. However, any proposals for development must address the relationship with the historic town, in order to maintain the landscape character associated with the Butts.</p> <p>Biodiversity</p> <p>The site is likely to have some biodiversity interest, particularly common reptiles. The site must also be considered to hold high potential for bats, if only in respect of foraging habitat and surveys would be needed to determine the relative importance of vegetation and the building. There have been past reports of rat infestation on the site, which would have reduced waterfowl breeding success and may have had effect on water voles on the neighbouring watercourse.</p>				
EIA Screening: dependent on area, but the proximity of the SAM needs to be considered; therefore screening for EIA recommended.			Appropriate Assessment: dependent on area, but unlikely to trigger exceptional concerns.	

Green Infrastructure	
<p>The site contributes, in part, to the GI of Sandwich in providing an open view across from the Butts, albeit the dereliction of the site is a strong counterbalance to this. There are no PRoW on the site, but it does abut the recreation ground, so there would be potential in creating a link through to the Woodnesborough Road. However, PRoW ESX14 already exists along the Butts and another link has very limited merit. Overall, it is a matter of fine balance as to whether development here would bring any GI benefits.</p>	
Proximity to Road Network SHLAA Score: --	
<p>The access for the site is between two properties, 3 and 5 Woodnesborough Road and this has been in use in the past for a haulage firm. The vehicle movements of this previous use would, therefore, indicate that the access would be suitable for residential development.</p>	
Access to Services SHLAA Score: --	
<p>The site is approximately 20m away from the nearest bus stop (87/88 hourly service to Sandwich and Dover) and 230m away from the nearest Doctors surgery in Cattle Market. The nearest school (Sandwich Juniors School) is approximately 870m away. The town centre, with a range of shops and local facilities, is approximately 400m from the site.</p>	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
<p>Although the site is located close to local facilities in the town and the access would be suitable, development would have a detrimental impact on the Ancient Monument and the Conservation area through the loss of open space that runs around the majority of Sandwich.</p> <p>The site is also located within Flood Zone 3 and within the area of Maximum Breach. Alternative sites should be considered.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code SAN16	Address Land to the rear of 2 Whitefriars Meadow	Parish Sandwich Hierarchy Rural Service Centre	Overall SHLAA Score Not scored due to flood risk	Area 0.35 Ha Indicative No. of units @ 30 dph = 10
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Irregular shaped site located within the central area of Sandwich. The site consists of scrub and grassland. A 1970's housing estate abuts the northern boundary and continues to the east of the site. There is an older property, Mayerling, abutting the eastern boundary (between the site and housing estate). To the south there is a public footway and the Town Wall (an ancient monument). Beyond the Town Wall there is a river. To the west there is Cattle Market car park.</p> <p>There is scrub/hedgerow along the western boundary with the car park and a line of trees running along the eastern boundary with Mayerling.</p>				
Policy Alignment SHLAA Score: --				
The site is within the Settlement Confines.				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site falls within Flood Zone 3 and within the Maximum Breach area. Revised EA flood mapping now indicates that this site is within Flood Zone 2. Alternative sites should be considered for residential development.</p> <p>The Environment Agency has recently secured funding for flood defence improvements for Sandwich, which are programmed to be completed in 2015. This should reduce the flood risk in Sandwich in the long term but not change the Flood Zone methodology.</p> <p>Historic Environment</p> <p>The site lies within the Walled Town Sandwich Conservation Area. The site also abuts a Listed Building (part of the old wall) and the Ancient Monument. Development of the site would result in the loss of open space that makes a considerable contribution to the setting of the town and Ancient Monument.</p> <p>Landscape Impact</p> <p>The site lies within the urban area, but development would create enclosure of the Cattle Market area, divorcing it from the wider views to and from the Rope Walk and its setting. There would be a negative visual impact on the setting of the Rope Walk and views from the Rope Walk to the town would be reduced adversely. There would also be a change in local character caused by this increased enclosure.</p> <p>Biodiversity</p> <p>The biodiversity of the site is limited, partly due to the lack of management and location. Common reptiles may use parts of the site, while birds will use the higher vegetation. There is a ditch on the site, but this has suffered from long-term shading, diminishing its value for biodiversity. Overall, biodiversity would not be a hindrance to development.</p>				
EIA Screening: the proximity of the SAM needs to be considered; therefore screening for EIA recommended.		Appropriate Assessment: too small to be required.		
Green Infrastructure				

The site provides a pleasant, if fairly inaccessible, setting for people moving between the Cattle Market and the Rope Walk (PRoW ESX13) along Fellowship Walk (PRoW ESX15). It would be essential that the ambience of this route is maintained, which would entail the site boundary here being given over to and managed as GI. The ditch would have to be considered, both in terms of provision of SUDs and its own protection from urbanisation impacts. Overall, development is unlikely to benefit GI.

Proximity to Road Network SHLAA Score: --

There is no specific access identified and the site does not connect to the public highway. If access was sought via the adjacent car park then adequate footway/cycleway provision must be made as well as an apparent roadway across the private land. Access for refuse collection would need to be either a store within a 25-30m carry distance from the public highway or by a private arrangement for the refuse lorry to enter upon private land with adequate turning and manoeuvring space.

Access to Services SHLAA Score: --

The site is close to the facilities in the town centre (approximately 230m). The site is just under 70m away from the Doctors surgery and 250m from the local supermarket.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Although the site is centrally located within Sandwich close to local services, the site falls within Flood Zone 2 and the area of Maximum Breach. Alternative sites should, therefore, be considered for residential development.

The site is also adjacent to a Listed Building and Ancient Monument. Development of the site would result in the loss of the open space that makes a considerable contribution to the setting of these historic assets.

Consideration for inclusion in the Submission Document?

No

Site Code	Address	Parish	Overall SHLAA Score	Area
SAN01M & SAN06M	Land to the south of Ash Road (adjacent to Fire Station)	Sandwich	Not scored due to Flood Risk	0.3 Ha
		Hierarchy Rural Service Centre		Indicative No. of units @ 30 dph = 9

Current Use SHLAA Score: --

Description of Site

Two sites that overlap, located on the north western edge of Sandwich. The first SAN01M is a triangular shaped site consisting of the KCC Depot land from the access off Ash Road down to the South Poulders Stream to the south. This land has been surfaced and is currently used for the storage and distribution of gritting salt and, at the most southern part (adjacent to the stream), parking for the cricket club. The whole area was put forward as a suggested car and coach park for green and heritage tourism.

SAN06M also includes additional land to the west of SAN01M that consists of a disused cricket training area (now not maintained and is overgrown). The whole area has been suggested for mixed use, with residential development to the north and leisure on the remaining depot land and the cricket training area. The strip of land to the south adjacent to the stream would continue to be leased by the cricket club.

The access is from Ash Road where the site forms a point. To the west of this site there is a residential property (Canterbury Gate House) and the Fire Station. To the east there is a drain that runs down the length of that boundary. Beyond that there is open space, which lies in front of the old Town Wall (The Butts). To the north and south there is more open space. The railway line runs along the south western boundary. To the west there is another drain and residential property with a large garden. To the north west there are more residential properties that front Ash Road.

Policy Alignment SHLAA Score: --

The site falls outside of the Town Boundary. Only the northern boundary abuts this boundary line.

Physical Constraints SHLAA Score:

Flood Risk

The site falls within Flood Zone 3 and the area of Maximum Breach in the SFRA. Revised flood mapping by the EA indicate that this site is still within Flood Zone 3. Alternative sites should be considered for residential development. Leisure uses and parking would be suitable.

Historic Environment

The site falls within the Walled Town Sandwich Conservation Area and is adjacent (only the river separates it) to the Town Wall Ancient Monument. This open area is a section of the open space that follows the line of the Medieval Town Wall around the majority of Sandwich and must be retained. Development would have a detrimental impact on the character and setting of the Ancient Monument through the loss of this open space.

Landscape Impact

The site is flat, and the storage of gritting salt makes an incongruous impact in views from the Butts. The removal of this and utilitarian buildings would be of benefit to the setting of the town. Replacement by dwellings would have to be carefully considered so as not to make any landscape gains insignificant. Redevelopment the Ash Road frontage could be beneficial if the visual connection to Gallows Field pastures beyond was enhanced.

Biodiversity

There is unlikely to be a substantial nature conservation interest but surveys for bat roosts in the buildings should be carried out. The rough grassland areas may well support common reptiles. The

eastern boundary, beyond the fringing vegetation, is a ditch where water voles have been recorded. The protection of this species would have to be taken into account, particularly as the ditch system forms the majority of the boundary of the whole site.

EIA Screening: not required for the proposed no. of dwellings	Appropriate Assessment: not required for the proposed no. of dwellings
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Green Infrastructure

The site lies next to the recreation ground and a beneficial link could be created through bridging the ditch for pedestrian use. This would supplement the access (PRoW ESX14) along the Butts to Ash Road and strengthen the connection to Gazen Salts with its nature reserve, recreational facilities and access to the River Stour. With appropriate ditch management, biodiversity interests and connectivity could be enhanced.

Proximity to Road Network SHLAA Score: --

Any development of the site would require the access track to be upgraded to an adoptable standard. Development would also require a new junction. Visibility is limited and waiting restrictions may be required to aid visibility.

Access to Services SHLAA Score: --

The site is approximately 100m away from the nearest bus stop (which serves the No. 15 route, hourly to Sandwich, Deal and Canterbury). The nearest Doctors surgery (Cattle Market) is almost 700m away. The town centre, with a selection of shops and local facilities, is of a similar distance away.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Although the site is close to a frequent bus route, development of the site would have a detrimental impact on the setting of the Ancient Monument through the loss of the important open space that follows the line of the Medieval Town Wall around the town.

The site falls within Flood zone 3 and the area of Maximum Breach. Alternative sites would have to be considered for residential development.

Consideration for inclusion in the Submission Document?

No

Site Code SHL055	Address North Poulders Farm, Richborough Road	Parish Sandwich	Overall SHLAA Score 27.5 (Undeliverable)	Area 1.16Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located north of Wantsum Lees residential development (1970s), the most north western development in Sandwich. The area is flat but lies slightly lower than the road and consists of three properties, North Poulders Farm, Mill View and Little Paddocks. The remaining land has been divided up into paddocks for horses. The site has drains around the whole boundary.</p> <p>The railway line runs along the western boundary and Richborough Road runs along the eastern. Beyond the road to the east there is the River Stour. To the north there are fields and the whole area looks marshy.</p> <p>There are a number of ornamental trees on the frontage of the properties and a line of Scrub/trees along the railway line. There is also a large hedge within the grounds of Mill View.</p> <p>There are overhead pylons adjacent to the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The southern boundary is adjacent to the Urban Boundaries.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 3 and within the area of Maximum Breach in the SFRA. Revised flood mapping by the EA indicate that this site is still within Flood Zone 3. Alternative sites should be considered for residential development.</p> <p>Historic Environment</p> <p>The Walled Town Sandwich Conservation Area is approximately 75m to the south east of the site. Development at this location would not affect the setting of the Conservation Area.</p> <p>Landscape Impact</p> <p>This is an urban fringe site which is in good condition and provides a beneficial separation between the town and the discrete outlying area occupied by Ling Metals, the angling lakes, A256 flyover and railway crossing. The site is visible to varying degrees from locations on the A256. Development would alter the balance between built and undeveloped land along Richborough Road, increasing the coalescence with the outlying area, effectively extending the urban fringe to the A256 flyover. This would have the effect of creating a tongue of urban development into the countryside, which would be damaging to the setting of Sandwich.</p> <p>Biodiversity</p> <p>The site is bounded by ditches and the sluice-controlled North Poulders Stream. Ditch and water vole surveys would be necessary. If demolition of the existing buildings was contemplated, bat survey would also be necessary, due to the proximity of high quality habitat. The site may support common</p>				

reptiles.	
EIA Screening: Yes, due to size	Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy, while required, is unlikely, alone, to provide sufficient mitigation, especially if taken in-combination with other sites.
<p>Green Infrastructure</p> <p>Richborough Road is on the route of the Saxon Shore Way and the Stour Valley Path. Development should not interfere with this. The main GI provision will be biodiversity. Development will not enhance this and there may be issues relating to the surrounding ditches and surface water flooding (in addition to fluvial) with loss of absorption capacity which would result from development.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>An acceptable vehicle access could be created to right hand side but it would be necessary to remove the frontage vegetation and improve immediate highway. The dyke obscures visibility to left, so any access would need to be raised to overcome this.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The site is approximately 230m away from the nearest bus stop. These serve the No. 14 service which is hourly to Sandwich, Deal and Canterbury. The nearest Doctors surgery is in the Butchery, which is approximately 1km away. The local primary school is approximately 2km away from the site.</p> <p>The town centre is also approximately 1 km away.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located on the edge of Sandwich and whilst the site within walking distance of public transport development would be detrimental to the setting of the town and the wider landscape by increasing urban sprawl into the countryside.</p> <p>The site is also within Flood Zone 3 and within the area of Maximum Breach. Alternative sites should therefore be considered.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAN02E	Address Land adjacent to White Mill, North Poulders	Parish Sandwich	Overall SHLAA Score Not scored as site within flood risk & employment use	Area 1.46 Ha
		Hierarchy Rural Service Centre		
Current Use SHLAA Score: --				
Description of Site Irregular shaped site located on the north western side of Sandwich. The site is flat and consists of scrub with a line of trees along the southern boundary, separating the site from the neighbouring business uses. There are drains around the remaining boundary line (north, west and east) separating the site from agricultural fields. The site has been suggested for business uses.				
Policy Alignment SHLAA Score: --				
The site is approximately 240m from the urban boundary.				
Physical Constraints SHLAA Score: --				
Flood Risk The site falls within Flood Zone 3 and within the area of Maximum Breach in the SFRA. Revised flood mapping by the EA indicate that this site is still within Flood Zone 3. Business uses are classed as 'Less Vulnerable' in government guidance and would be appropriate for this flood zone.				
Historic Environment The site is within 50m from a Listed Building (White Mill). There is concern that development would have a detrimental impact on the setting of White Mill through the loss of open space associated with rural locations.				
Landscape Impact The surrounding area is flat grazing marsh with urban fringe impacts (garden centre and other local businesses, horse pastures together with the White Mill, a visitor attraction). In respect of the Mill, surrounding development is somewhat detrimental to its landscape setting and housing would exacerbate this. Housing would also adversely affect the grazing marsh character of the area and appear as an anomalous element in a rural landscape. Development of the whole site for employment use would also have adverse impacts, although these would be slightly mitigated for by the pre-existing buildings. If employment uses were confined to the southern section, the impact could be insignificant.				
Biodiversity The site appears as ungrazed rough grassland with occasional scrub trees (Google Earth 2008, accessed 2011). There will undoubtedly be some biodiversity interest here, ranging from common reptiles to bird roosting/nesting on the grassland to water voles and invertebrates in the ditches and a full suite of surveys would need to be undertaken to ensure that wildlife interests were protected. There may also be use of the site by bats for foraging.				
EIA Screening:: dependent on the nature of any proposals coming forward.			Appropriate Assessment: unlikely for employment use of the land.	
Green Infrastructure The site is divorced from any recreational walking opportunities and none could be sensibly created given the marshland nature of the area. The major GI component is biodiversity and the provision the site can make in respect of this reflects the comments regarding development impacts on the local landscape, in that restricting development to the southern part of the site should not adversely affect GI.				

Proximity to Road Network SHLAA Score: --

It is likely that the existing access onto Ash Road would need to be upgraded since it is currently served off a light duty vehicle crossing and is not suitable to accommodate additional vehicle movements, particularly by large vehicles. This may prove difficult since the necessary improvements will be on land not forming part of the application site and thus the land necessary may not be in the control of the applicant.

If this is within the control of the applicant the access would need to be constructed with at least 6m if not 10.5m radius kerbs (depending on the type of vehicles expected to access and egress the site). The width must allow two vehicles to pass to prevent vehicles waiting on Ash Road when another vehicle is exiting so a minimum of 6m will be required. Any gates would need to be set back to allow a lorry to wait off the highway whilst gates are being opened. Due to the alignment of the road KCC Highways is reasonably confident that visibility will not be an issue, even though Ash Road at this location is subject to the National Speed Limit. An existing footway connects the site to Sandwich town.

Access to Services SHLAA Score: --

There are bus stops adjacent to the industrial site on Ash Road serving No.14, which runs hourly to Sandwich, Deal and Canterbury.

The site is over 1km from the town centre.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Development of the whole site would not be suitable due to the detrimental impact on the setting of White Mill, a Listed Building and on the wider landscape. It may be possible to develop the southern part (essentially squaring off the existing business area) as this would not impact on the wider landscape. Design would, however, have to respect the setting (open character) of the Listed Building.

Consideration for inclusion in the Submission Document?

Yes (Part)

Small area to the south west of the site.
Access
Setting of Listed Building

Capel le Ferne

Site Code SHL085	Address Longships, 9 Cauldham Lane, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 34.5 (6-10 Years)	Area 0.5 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>This site lies immediately adjacent to the draft allocation within the Preferred Options document for approximately 15 units at Cauldham Lane (see LDF14 and Map 41). The site is bounded by existing development on the north and east.</p> <p>The site is well screened from the road and from the wider landscape by mature trees and hedging on its boundary. At present the site has one dwelling roughly in the centre of the site. However, if the screening was removed the site lies on an open plateau with long distance views.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
The site lies outside of the settlement confines, but adjoins the confines on two of its boundaries.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Telephone wires run alongside the road. The hedgerows along the road are well established and provide visual screening.				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>The site is less than 200 metres from the AONB and is very prominent in landscape terms. Currently, the site has mature boundary planting together with a high density of mature trees on the site. If the site were to be developed, much of this vegetation would be lost, exposing the site to views from the AONB and the bridleway ER253. Development would have a detrimental impact on the setting of the AONB.</p> <p>Biodiversity</p> <p>Being a private garden of some considerable size, it is probable that the site supports a number of common species including common reptiles. The number of mature trees and age of the dwelling, even given the poor surrounds, would indicate a reasonable suitability for bat roosting that would need investigation. It would be important to maintain a considerable number of the trees on site and this would reduce the development potential.</p>				
EIA Screening: based on the dph, screening would be necessary.			Appropriate Assessment: a contribution to the Thanet Coast mitigation strategy would be necessary and the may be a necessity to consider in-combination impacts on the Folkestone to Etchinghill Escarpment SAC.	

Green Infrastructure
Over and above the comments on landscape and biodiversity, the site does not contribute to GI and it is unlikely that development could make any substantial improvement.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site
The site is accessed from Cauldham Lane which is a single track road and is rural in nature. The speed limit goes up from 30mph to 60mph just west of the site boundary but the site is located within the 30mph zone. It may be possible to achieve sightlines at the site with the removal of the hedge. However, visibility at the junction with Capel Street is poor and there are no pedestrian footways along Cauldham Lane to connect onto. Pedestrian connectivity to the settlement is therefore somewhat limited.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk
Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis
The site is well screened given the existence of mature trees and hedgerows, there are significant concerns in relation to access and the impact on the landscape. KCC Highways have confirmed that it is unlikely that access could be achievable. This is given the poor visibility and rural nature of the road. In terms of impact on the landscape the site lies on a plateau where development would be visible in long distance views and therefore development of the site should be resisted.

Consider for inclusion in the Submission Document? **No**

Site Code SHL091	Address Land at Little Cauldham Farm, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 27.5 (Undeliverable)	Area 6.2 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site is vast, forming only part of a large field, which slopes to the south. Since the site forms part of a larger field there is no natural boundary to the north. The site is not located within the AONB, however any development would affect its setting as the AONB boundary lies nearby to the west. On inspecting the site it would appear that there is no possible access as the site is enclosed by existing residential development to the east, north and south, with open countryside to the west. The site submission was not accompanied by identification of any adjoining residential properties for achieving an access.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
The site is located outside, but immediately adjacent to the settlement confines on two of its boundaries.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
The site slopes to the south.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
<p>Landscape Impact</p> <p>The site is enclosed on two sides, to the south and east by housing. However, to north there would be exposure across arable fields towards Cauldham Lane and Green Lane with some partial inter-visibility with the AONB beyond. The AONB is closer to the west and although currently screened by hedging, this is dependent on third party management.</p> <p>Any development of the site would be visible from afar, especially given the scale of the development and the lie of the land. Development of the site would be detrimental to the setting of the AONB to the west.</p> <p>Biodiversity</p> <p>Biodiversity interest would be very limited and not be an impediment to development.</p>				
EIA Screening: necessary due to size of development		Appropriate Assessment: necessary due to size of development and requirement to contribute to Thanet Coast SPA mitigation strategy.		
<p>Green Infrastructure</p> <p>The site currently makes no GI contribution to the wider area, except in wider ecosystem service</p>				

provision (Ground Water Protection Zone [GPZ] 3). If the site were to be developed there would need to be provision of extensive GI.

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility

The site is enclosed by existing residential development to the east, north and south with open countryside to the west. There is therefore no possible access onto the site unless third party land is used. For information, for the proposed number of dwellings a secondary access would also be required.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Development of this site is not possible given that access is unachievable without the acquisition of third party land. In any case, development at the scale envisaged on this site would be too large given the size of the existing settlement, and the impact of any development would be detrimental to the setting of the AONB.

Consider for inclusion in the Submission Document?

No

Site Code SHL060	Address Land between 107 & 127 Capel Street, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 32 (6-10 Years)	Area 1.6 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>This site lies outside of the settlement confines and immediately adjacent to the AONB to the west. The site is well screened from road, where there with an existing hedgerow (which extends over two metres in height). There is also hedgerow alongside the western boundary which separates the site from the AONB. The site is currently a paddock and has no buildings on it.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
<p>The site is located adjacent to the settlement confines, with existing residential development on three sides.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>The site is immediately adjacent to AONB to the west, beyond a substantial hedge. Any development would have to ensure that it did not have a detrimental effect on the setting of the AONB. (Hedges are often removed for views or convenience). The other boundaries similarly have hedging as boundaries, that along the roadside being the most obvious, which contributes to the village character in this part of Capel-Le-Ferne. The grain of the village in this location reflects historical ribbon development, along Capel Street. This site could offer the opportunity to change this layout, although there would have to be considerable investment in GI for development to continue to contribute to the village fabric and protect the AONB.</p>				
<p>Biodiversity</p> <p>The hedging along the village edge provides a corridor for wildlife and possibly flight-lines for bats and birds. All the boundaries of this site will contribute to that, although the roadside hedge would be of least importance in this respect, due to urban factors. The paddocks are likely to support common reptiles towards the perimeter. Providing all the hedging not against the highway is kept, biodiversity concerns would be allayed.</p>				
EIA Screening: necessary due to potential scale of development and proximity to AONB		Appropriate Assessment: contribution to Thanet Coast mitigation strategy required.		
<p>Green Infrastructure</p> <p>GI here is currently limited; no footpaths cross the site and the nearest to the west are some distance off and screened by the hedgerow. Landscape sensitivity requires that GI be included in any development and this could be of wider community benefit.</p>				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
<p>Capel Street is a narrow residential street. There is a footway on the eastern side of the carriageway. However, this stops just prior to the site, at a point when the road width narrows. A footway would need to be provided along the site frontage. This would involve the total loss of the hedge in order for a satisfactory access to be achieved.</p>	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk	
<p>Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.</p>	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
<p>In order to achieve access to the site any development would require the removal of the roadside hedgerow. Development could have a very urbanising effect on the area relative to the current surroundings, would be unlikely to be in keeping with the character of village and have a detrimental impact on the setting of the AONB. A lower overall dph with land given over to GI could maintain and potentially enhance the character of the area while offering protection to the AONB. If just frontage development was being considered, it is felt that this would not be worth the loss of hedgerow. If the settlement of Capel is to function as a Local Centre then an element of new development will be necessary to ensure that its services are maintained. Consequently this site should be considered for future development, subject to a green buffer between the built form and the boundary with the AONB being retained.</p>	
Consider for inclusion in the Submission Document?	Yes

Site Code SHL084,	Address 38 Cauldham Lane, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 30.5 (11-15 Years)	Area 0.22 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
Description of Site The site is bounded by existing residential development to the east and open countryside on the other three sides. The land opposite the site, to the west, is located in the AONB. There are some buildings on the site, possibly associated with equine or agricultural uses. Cauldham Lane is very rural in nature (single lane) and bends sharply alongside the site. This boundary with the road is a mix of established hedgerows and small trees.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is located outside, but immediately adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed The site is enclosed by hedgerows. Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact Any development on the site would have a detrimental impact on the setting of the AONB which is located immediately opposite the site. The site lies on the edge of the settlement demonstrating a characteristic decrease in density and as a consequence any development would tend to harden the urban fringe, particularly given that sightline requirements would result in loss of frontage screening. Development would be unacceptable on landscape grounds. Biodiversity The site appears to have a multiple use, part external storage, part animal housing (Google Earth image 2007, accessed 2011) behind a native hedge. It is likely to support a limited biodiversity, for which its hedgerow would be of greatest importance.				
EIA Screening: needed due to the proximity of the AONB		Appropriate Assessment: too small		
Green Infrastructure Directly opposite lies the bridleway ER253. However, the site itself has little to offer in terms of existing GI or potential for enhancement.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site It would be difficult to achieve the required sight lines given Cauldham Lane has a 60mph speed limit at this point. Any development of the site would give rise to a dependency on private car. This is especially since the site is a significant distance from the shop and other services and there is no footway from the site to the facilities in the local centre.				

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Whilst it may be possible to achieve access onto the site, there are concerns in relation to the achievement of the required sight lines. The road sharply bends alongside the site, and is a narrow rural road with no footways. The site lies adjacent to the AONB and any development on the site would have a detrimental impact on the landscape.

Consider for inclusion in the Submission Document?

No

Site Code CAP02M	Address Former petrol station site on land to west of 185 New Dover Road, Capel le Ferne	Parish Capel-le-Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.67Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 20
Current Use SHLAA Score:				
Description of Site <p>Approximately 20 years ago the site operated as a Petrol Filling Station. Access to the site is through a locked gate. The site has been left to scrub-over, however a very small area of hard-standing still remains on the site. The boundary to the south, with the New Dover Road, has a well maintained hedgerow approximately one metre in height, with an existing access to the site. The boundary to the west has a number of large trees, however there are views through this boundary. The site is located within the AONB, however its previous use must be taken into consideration, in so far as whether any development on the site could improve the appearance of the AONB in this locality.</p> <p>PPS3 provides a definition of previously developed land, and specifically excludes “Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings)”. Given that a period of approximately 20 years has lapsed since the site was last in operation, the site should not be considered as previously developed land.</p>				
Policy Alignment SHLAA Score:				
The site is located outside of the settlement confines.				
Physical Constraints SHLAA Score:				
<p>The site is relatively flat. A mast is located in the field to the north of the site; however this is not expected to act as a barrier to development.</p>				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
The frontage of the site was formerly used as a petrol filling station and that part of the site retains the characteristics of previously developed land. This small part of the site may be contaminated and investigation and remedial work may need to be undertaken.				
Landscape Impact				
The site is flat and open to all but the east. Although it lies within the AONB, the area is somewhat degraded by the presence and associated paraphernalia of masts. Development of the site, however, would be unlikely to provide any enhancement of the landscape and due to its very openness is likely to have a detrimental visual impact on the designated landscape by the introduction of harsh urban features.				
Biodiversity				
The site was originally used as a petrol station. However, the rear of the site has now re-colonised by vegetation and would no longer be considered previously developed land. The site was recorded in the 2003 habitat survey as neutral grassland and this would need to be assessed in greater detail, although the site is unlikely to constitute lowland hay meadow (which would trigger the need to protect				

it). The site is likely to support common reptiles and possibly certain ground-nesting birds.

EIA Screening: necessary due to its location.

Appropriate Assessment: potential in-combination impacts on Folkestone to Etchinghill SAC; also contribution to Thanet coast mitigation strategy needed.

Green Infrastructure

The site contributes little to existing GI and its potential, if developed for housing, is limited.

Proximity to Road Network SHLAA Score:

This section of New Dover Road has a 60mph speed limit and there are sufficient sightlines to achieve an access. The properties to the east of the site are direct frontage access and it is not thought that an access would disrupt the freeflow of traffic. There is an existing footpath which runs along the site frontage.

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Although a very small part of the site is previously developed land, the remainder of the site has now scrubbed over and has blended into the landscape. Furthermore, the site is divorced from the existing settlement and falls within the AONB. Mixed development in this position would create a dense urban form in the countryside and would have a detrimental impact on the landscape designations. The site has been put forward for tourism use, as an extension to the existing residential home and holiday park, for the siting of tourist pitches. The desire for this form of development does not alter the analysis, and this form of development would not be suitable for this site. Furthermore, there is concern that any development of the site may disrupt the flow of traffic on New Dover Road.

Recommend for inclusion in the Submission Document?

No

Site Code SHL047	Address Old Dover Road Site, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 23 (Undeliverable)	Area 0.87Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site is located to the west of Varne Ridge holiday park, with low density residential properties to the north and east. The site fronts the Old Dover Road and beyond this the cliff top. As a result there are long distance views both to Dungeness and parts of France. The site is level with the road, and is unfenced along this boundary. The site mainly chalk grassland, although there are a number of small bushes dotted around the site (these are not confined to the boundaries of the site).</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
<p>The site is located outside of the settlement confines located some distance to the east, and as a result is divorced from the settlement.</p>				
Physical Constraints SHLAA Score: 1.0 – Sites close to cliff or coastal areas liable to erode				
<p>Opposite the road is an Open Space designation which is contained within the AONB, CCMA and Heritage Coast. This occupies a cliff top location, and the cliffs are SSSI.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No considerations</p>				
<p>Landscape Impact</p> <p>The site lies directly opposite AONB and Heritage Coast. The Old Dover Road in this location has an open semi-rural character which is in keeping with the wider landscape, being at the edge of the settlement of Capel-Le-Ferne. Development on this site would have an urbanising influence on the surrounds to the detriment of the landscape and its setting for the AONB/Heritage Coast.</p>				
<p>Coastal Change</p> <p>The site lies outside, but adjacent to the, Folkestone Warren Coastal Change Management Area.</p>				
<p>Biodiversity</p> <p>The site has been recorded by habitat surveys in 1990 and 2003 as chalk grassland, a priority habitat under the Natural Environment and Rural Communities Act 2006, which through the application of PPS 9, would militate against development. The site is undergoing succession to scrub, due to lack of management. Opposite the site is the Folkestone Warren SSSI and there is likely to be some transference of species between the two sites (invertebrates, birds).</p>				
EIA Screening		Appropriate Assessment		
<p>Green Infrastructure</p> <p>The site lies within identified GI and is subject to protection under Policy CP7. Furthermore, it lies within the area identified for GI networks improvements, which in this case would suggest appropriate chalk grassland management. Opposite the site lies PROW ER246 which is contiguous with the North Downs</p>				

Way, highlighting the national recreational importance of the area, which is supported by the existing landscape. Any urbanising impacts here would be highly detrimental to the existing GI.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is located within a derestricted speed limit area (60mph), as a result there are visibility requirement concerns. However, given that the road is relatively straight sight lines may be achievable. There are no footways along this part of the Old Dover Road, therefore pedestrian connectivity to the main part of the settlement is somewhat limited.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site, however the Primary School is located further away – approximately a ten minute walk.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is divorced from the main part of the settlement, with limited pedestrian links. Although access could possibly be achieved there are overriding issues in connection with the impact that any development would have on the landscape. Adjacent land is Heritage Coast and SSSI, with AONB to both the south and over the New Dover Road to the north. Consequently development of this site would have detrimental landscape impact.

Consider for inclusion in the Submission Document?

No

Site Code SAD01	Address Land to the north of the New Dover Road	Parish Capel le Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 7.18 ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 215
Current Use SHLAA Score:				
Description of Site				
<p>This site is vast, although it comprises part of a much larger open field, and is entirely within the AONB. Immediately to the east is the former petrol filling station (see form CAP02M) where there is an established hedgerow. Adjacent to the boundary to the north the land has also been submitted under reference CAP02. A footpath runs alongside the western boundary, and beyond lies existing residential properties located within the settlement confines.</p> <p>Given the scale of the site and its designation within the AONB any development proposed covering the entire site would be unacceptable in landscape impact terms. Any development would seek to urbanise an area which is currently very rural in character.</p>				
Policy Alignment SHLAA Score:				
The site lies outside but immediately adjacent to the settlement confines.				
Physical Constraints SHLAA Score:				
The site is flat and entirely located within the AONB.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
The whole site is located within the AONB and development at the scale envisaged would be unacceptable both in terms of adverse change in landscape character and visual impact, the latter exacerbated by the openness of the site to the N and E.				
Biodiversity				
The only biodiversity the site may support, apart from ground-nesting farmland birds would be associated with the vegetation screening bridleway ER252 on the western boundary and transitory incursions by species from grassland areas to the east. Development would be likely to increase the presence of common species (urban wildlife).				
EIA Screening: essential due to location		Appropriate Assessment: impacts on Folkestone to Etchinghill Escarpment need consideration; contribution to Thanet Coast mitigation strategy would be required.		
Green Infrastructure				
The site is bounded to the west by Green Lane, bridleway ER252 which arcs around the NE of Capel-Le Ferne, giving a strategic walking connection between the Alkham valley and the Warren (via Eagle's nest steps). Any substantial enclosing of this bridleway would be detrimental to Dover GI.				

PROW ER241 bounds the north of the site and provides one of the strategic paths radiating from

Green Lane into the countryside to the east. Currently this runs through open arable fields and it might benefit from enhancement. Development would require considerable GI investment. However, this would not outweigh the landscape harm. The current ecosystem service provision in terms of surface water absorption also needs consideration.

Proximity to Road Network SHLAA Score:

The site fronts the New Dover Road (B2011). The speed limit changes from national to 40mph at the western end of the site so that the site lies in the national speed limit zone. It should be possible to create an access onto the site. There is a footpath running along the western extent of the site and a footway on the southern extent of the site (on the northern section of New Dover Road) both of which link to a bus stop in the south-west corner.

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

At the scale put forward development would be unacceptable to both the AONB and its setting. Any development of this site would seek to urbanise a very rural landscape, particularly given that there are no natural boundaries to the north east of the site. The only part of the site that could conceivably be brought forward is the frontage to New Dover Road, which in itself would give rise to concerns of physical loss of AONB and views into it from the B2011, ribbon development and the need for substantial GI to protect Green Lane and avoid creation of a high-density enclave at the settlement edge.

Consider for inclusion in the Submission Document?

No

Site Code SAD02	Address Land opposite Battle of Britain Memorial, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.54 ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 16
Current Use SHLAA Score:				
Description of Site				
<p>The site comprises dense scrubland, screened from the road by thick hedgerows (which are over three metres in height). The site is located entirely within the AONB. Existing residential properties are located to the north (within the settlement confines for Capel) and to the south, although these properties are located within Shepway District Council. Any development on the site would lead to the coalescence of housing within Capel (located in Dover District) and housing located on the New Dover Road (in Shepway District). The Battle of Britain Memorial is located immediately opposite the site.</p>				
Policy Alignment SHLAA Score:				
The site is located outside, but immediately adjacent to the settlement confines.				
Physical Constraints SHLAA Score:				
The site is located within the AONB, telephone wires run alongside the roadside frontage of the site.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
<p>The site is within the AONB and Heritage Coast is opposite. Although the majority of the site is currently dense scrub, this provides a natural enclosure when viewed from deeper within the AONB, such as on bridleway ER253. Removal of the scrub would inevitably give views to the New Dover Road and its paraphernalia, although this would be mitigated to an extent by the screening associated with the Battle of Britain Memorial (AONB/Heritage Coast). If the site were developed, however, the natural enclosure would be lost as would the local connectivity between the land-side and coast-side elements of the AONB, thus presenting a false, urbanised boundary to the AONB in this location, which must be considered to be detrimental to the purpose of the landscape designation.</p>				
Biodiversity				
A biodiversity assessment would be required. The site is likely to provide some limiting bird breeding and refugia opportunities in the scrub and the rough grassland is likely to support common reptiles.				
EIA Screening		Appropriate Assessment		
Green Infrastructure				
The site has no PROW crossing it, but bridleway ER253 passes to within 100 metres to the north. The biodiversity interest and recreational interest of the site is insignificant and it is unlikely that development would provide any significant enhancement.				
Proximity to Road Network SHLAA Score:				
If turning provision is located within site (the road is national speed limit - 60mph) an acceptable access could be created but this may require the removal of some of the hedgerow. There is an				

existing access onto New Dover Road at the southern end of the site but this is informal.

The access would not need to be staggered as conflict with the access to the Battle of Britain memorial site is not considered likely. A footway runs along the southern extent of the site (the northern section of New Dover Road).

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. A bus stop is located in close proximity on the New Dover Road, and the Primary School is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Any development of this site would have a detrimental landscape impact which would affect the setting of Capel. Any development of this site would be visually intrusive in landscape terms given its designation as AONB. In addition the coalescence of Capel with the urban sprawl of Folkestone should be strongly resisted.

Consider for inclusion in the Submission Document?

No

Site Code NS01CAP	Address Intersection of Old Dover Road and New Dover Road, Capel-Le-Ferne	Parish Capel	Overall SHLAA Score 28	Area 0.21 ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 6
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site is currently unmanaged grass and scrub. The site is located at the junction of the Old Dover Road and New Dover Road. To the west lie existing residential properties, however they are not within Capel's settlement confines and lie some distance from the services and facilities on offer. The site is located at the intersection of the New and Old Dover Roads, which define the boundaries of the AONB. Thus, it is outside the AONB, but in very close proximity to it. The land to the south, namely the top of the cliffs is designated open space (Policy DM25 of the adopted Core Strategy) and Heritage Coast. From here there are impressive sea views with long distance panoramic views to The English Channel and beyond.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon Environmental Constraints The site is located outside of the settlement confines. To the immediate north and south of the site is AONB and to the south the land is also designated as open space and Heritage Coast.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows, to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact This triangular site is bounded on two sides by AONB and additionally on one side by Heritage Coast. These boundaries are all very close, approximately 12 metres away. For landscape purposes the site is effectively AONB, in that the Heritage Coast/AONB is seen across the Old Dover Road from the New Dover Road and vice versa to the land-side AONB. Any development on this site would be detrimental to both the setting of the AONB and the Heritage Coast, both in terms of visual impact and landscape character. There is no possibility of ameliorating such an adverse impact.				
Coastal Change The site lies outside, but adjacent to the, Folkestone Warren Coastal Change Management Area.				
Biodiversity The site comprises rough grassland with ruderal plants (Hogweed etc.) and a central copse of blackthorn. The rough grassland would support common reptiles while the copse could provide nesting sites and refugia for birds. Part of the Old Dover Road bounded has a slight bund to it and this could be chalk-based given the grass species present.				
EIA Screening: necessary, given its location			Appropriate Assessment: too small to	

		consider
<p>Green Infrastructure</p> <p>The site lies within identified GI and is subject to protection under Policy CP7. Furthermore, it lies within the area identified for GI networks improvements, which in this case could mean instituting grassland management. Opposite the site lies PROW ER246 which is contiguous with the North Downs Way, highlighting the national recreational importance of the area. Given the permeable nature of the site in respect of the AONB landscape, any urbanising impacts here would be highly detrimental to the existing GI.</p>		
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access would not be achievable from the New Dover Road as the site lies too close to the junction with the Old Dover Road. There is a national speed limit on this section of Old Dover Road. However, there are no footways along its length to connect onto.</p>		
<p>Access to Services SHLAA Score: 2.5 – Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. A bus stop is within a five minute walk, however the Primary School would be approximately a fifteen minute walk from the site, and would require crossing the busy New Dover Road.</p>		
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>		
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>		
<p>Analysis</p> <p>The site is a significant distance from the core of the village. It is not possible to create an acceptable access. Any development of the site would have a detrimental impact on the setting of the AONB and Heritage Coast, with no possibility of mitigating the adverse impact. The site is identified as GI and protected by Core Strategy Policy CP7.</p>		
<p>Consider for inclusion in the Submission Document?</p>		<p>No</p>

Site Code LDF015 (CAP04)	Address Land to the South of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel-le-Ferne	Parish Capel-le-Ferne	Overall SHLAA Score 29.5 (+15 Years)	Area 3.06 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The land fronts both the New Dover Road to the north, and the Old Dover Road to the south. It is bounded by Capel Court Caravan Park to the east and existing residential development to the west. Land immediately to the south of the site forms the coastline and is designated as Heritage Coast and AONB. The land to the north of the site is located in the AONB and is undeveloped countryside. The whole site is covered with mature trees and shrubs, and there is no natural delineation between LDF015 and CAP04. Bridleway ER252 runs along the western boundary.</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints				
<p>The site is located outside of the settlement confines. The AONB is located to the north of the site, and therefore any development would need to have regard to the setting of the AONB.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Telephone wires run alongside the New Dover Road.</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment Archaeological Remains would need to be investigated.</p>				
<p>Landscape Impact The site is flat and close to the cliff top above The Warren. It consists of chalk grassland which has become quite densely scrubbed over and is now developing into woodland. Opposite the northern aspect of the site is AONB while to the south it is additionally Heritage Coast. Development on the south side of the site would have a highly detrimental impact on these landscape designations. Any development to the north would harm the setting of the AONB and the general rural setting</p> <p>Development of the northern portion of the site was considered by the Inspector at the Local Plan public inquiry in 1998. The Inspector concluded that whilst Capel-le-Ferne is of a size where there is further development potential, the release of the land would be at great environmental cost and that adverse impact on the countryside and landscape outweigh the benefits of development.</p>				
<p>Overall, development of the site would have a detrimental impact on the setting of AONB and Heritage Coast.</p>				
<p>Coastal Change The site lies outside, but immediately to the north of, the Folkestone Warren Coastal Change Management Area.</p>				

Biodiversity

Successive habitat surveys from 1990 have indicated the transition from a predominantly chalk grassland site to one of scrub woodland with relict patches of chalk grassland in the south. This is an unfortunate loss of a national resource. It is not possible at this level of investigation to determine whether there is sufficient remaining chalk grassland for efforts be made to reverse the loss. If the remaining grassland is sufficient, there is a potential that small scale development could be accompanied by beneficial management of the remainder of the site. To avoid unacceptable conflict with coastal landscape interests any such development would have to be limited to the northern boundary of the site and the biodiversity gains would have to be carefully assessed against landscape harm to the countryside and AONB. If development were not to take place, biological succession would inevitably result in the formation of woodland here, which while not of the same ecological value as chalk grassland, would still support wildlife and have the additional benefit of maintaining a landscape edge to the village.

EIA Screening: given the sensitive location, EIA screening would be required

Appropriate Assessment: contribution to the Thanet Coast mitigation strategy would be required.

Green Infrastructure

Capel-le-Ferne is well served by PROWs which also provide access to the Warren. The site has a public bridleway, ER252, running along its western boundary that bounds the eastern urban boundary of the village and provides a connection between the inland PROWs and those associated with coast and The North Downs Way. Policy CP7 requires that this GI is protected and this requires maintenance of the ambience associated with it. The biodiversity component of GI is described above and this is a site in restoration of GI should be sought. Overall, it is considered that development of any part of the site would harm the landscape and recreational aspects of GI and that the loss of chalk grassland has now progressed to a state where any possible recovery achieved through a planning condition or obligation associated with allowing development of part of the site would not outweigh such harm.

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility

It may be possible to allow an access off New Dover Road if a right hand turning lane is provided as a minimum requirement. The junction to the site is within the national speed limit zone and therefore subject to more onerous sight line requirements as well as the policy objection. A single access would only serve up to 50 units.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. A bus stop is within a five minute walk, on the New Dover Road, and the Primary School is within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is located outside of the settlement confines of Capel-le-Ferne, and located in a national speed limit area. Therefore, whilst it is expected that a satisfactory access can be achieved, there are concerns in relation to visibility.

The main concern in relation to the site is the impact which any development would have on GI and the nearby AONB and Heritage Coast, which lie just opposite the site. If development were to take place on the site then the impact on these statutory designations and their contribution to GI would be detrimental. Development, even restricted just to the northern portion of the site, should be resisted.

Consider for inclusion in the Submission Document?

No



Site Code LDF014 (CAP05)	Address Land to the west of 9 Cauldham Lane, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 30.5 (11-15 Years)	Area 0.76 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site is broadly flat and appears to have been grazed by horses in the past, it is currently grassland. There are hedgerows alongside the site at its boundary with Cauldham Lane. The land falls away to the south west, and therefore any development would be sited on a prominent ridge. Although the site is not located within the AONB, however it is bounded by the AONB to the north, therefore any development of the site would have to consider its impact on the setting of the AONB. Cauldham Lane is rural in nature, and there are no footways alongside the site.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is located outside, but immediately adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Telephone wires run alongside the boundary of the site with the road.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The land rises gently to the northwest, into the abutting AONB which is arable farmland in this location. There is hedging around the northwest of the site but views are open across to the southwest across arable farmland into the AONB. To the southeast is a single large property in a wooded garden while on the opposite side of Cauldham Lane is the increasingly loose knit string of properties associated with the village edge. The site is typical of that found at the edge of a country village and contributes to the rural/urban transition Development would have a detrimental impact on the setting of the AONB unless it was very low density to reflect the surrounding village edge.				
Biodiversity There is likely to be some minor biodiversity interest associated with the grassland, for instance, common reptiles.				
EIA Screening: necessary due to setting of AONB and dph.			Appropriate Assessment: contribution to the Thanet Coast mitigation strategy required.	
Green Infrastructure The major GI interest of this site is the contribution it makes to the ambience of the village edge and the bridleway ER253 which runs parallel to the NW boundary before crossing the arable farmland into the AONB to the SW. This supports the landscape consideration that any development should be of low density to reflect the village edge and maintain the ambience of the existing PROW and the gentle recreational activities, such as horse-riding and dog-walking that are typical of such a location.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

The site is accessed from Cauldham Lane which is a single track road and is very rural in nature. The site is located in the 60mph zone and sightlines are unlikely to be achievable at the site.

Visibility is also poor at the junction with Capel Street. In addition, there are no pedestrian footways along Cauldham Lane to connect onto and therefore provision for pedestrians is considered poor. Any development of the site would give rise to dependency on the private car. This is especially since the site is a significant distance from the shop and other services and there is no footway from the site to the facilities in the local centre.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

There are now significant concerns regarding this site which was considered as suitable for development at the Preferred Options stage (March 2008). These concerns relate to both access of the site and impact on the landscape and GI. Development on this site would have a detrimental impact on the setting of the village and adjacent AONB, and as such should be strongly resisted.

Consider for inclusion in the Submission Document?

No

Site Code CAP06	Address Land to the south of Winehouse Lane, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score 30 (11-15 Years)	Area 1.38 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site comprises a flat meadow/ grassland, and is surrounded by hedgerows on all four of its boundaries. Existing development is located to the west, with agricultural land/ open countryside forming the other three boundaries. The site lies outside of the AONB, but the AONB boundary is immediately to the north of the Winehouse Lane and to the east of the site; therefore, any development would need to consider the impact on the setting of the AONB.</p> <p>The line of the Channel Tunnel runs across approximately a quarter of the site, and if development were to take place then the Health and Safety Executive would need to be consulted.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>The site is located outside, but immediately adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>The site has a number of hedgerows along its boundaries.</p> <p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment No considerations</p> <p>Landscape Impact The site comprises one of several hedged fields to the rear of properties on Capel Street. It has Winehouse Lane along its northeastern boundary with PROW footpath ER242 running along the short southeastern boundary. The site is flat with hedging to boundaries. It extends out into the countryside perpendicular to the grain of the village. Development would have an adverse impact on the setting of the AONB, which is located to the immediate north and east of the site</p> <p>Biodiversity There is likely to be some biodiversity interest associated with the hedgerows.</p>				
EIA Screening: required due to size		Appropriate Assessment: contribution to Thanet Coast mitigation strategy required.		
<p>Green Infrastructure</p> <p>The eastern side of Capel-le-Ferne is characterised by a series of fields separated by hedging, but with footpaths radiating out into the countryside and interlinking the field system. Any development should maintain and enhance the quality of these links to encourage recreational walking.</p>				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Winehouse Lane is narrow with no footways. Access to the site would require considerable loss of hedging to provide sight lines. It is also outside 30mph speed limit which requires further highway considerations. Any development of this site would seek to urbanise an area which currently exhibits very rural characteristics.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

An adequate access could not be achieved to serve this size of development without considerable highway improvements which would significantly alter the rural nature of the area. Any development on this site would have a detrimental impact on the setting of the AONB which lies to both the north and east. Furthermore, development would be against the grain of the village.

Consider for inclusion in the Submission Document?

No

Site Code CAP01	Address Land adjacent to 64 Old Dover Road, Capel-Le-Ferne	Parish Capel-Le-Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.15 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 5
Current Use SHLAA Score:				
Description of Site				
<p>The site is located to the south of the Old Dover Road and is currently grassland together with brambles and is not currently being managed. The site is located within the AONB and Heritage Coast both of which are national designations. The site lies just to the north of the cliffs and as a consequence there are extensive sea views.</p>				
Policy Alignment SHLAA Score:				
<p>The site lies outside, but immediately adjacent to the settlement confines. The site is located within the AONB and Heritage Coast both of which are national designations.</p>				
Physical Constraints SHLAA Score:				
Flood Risk				
<p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
Historic Environment				
<p>No considerations</p>				
Landscape Impact				
<p>The site is within the AONB, which gives priority to the conservation and enhancement of the landscape over other planning considerations. The site is also within the Heritage Coast designation. Any development would have a detrimental effect on these landscape designations and to the wider public benefit. Development would be unacceptable in this location.</p>				
Biodiversity				
<p>The land is currently grassland and lies adjacent to the Warren landslip, which is the Folkestone Warren SSSI. There may be a limited interest in the grassland as currently managed (e.g. common reptiles and certain plants).</p>				
EIA Screening: necessary due to AONB/Heritage Coast and SSSI			Appropriate Assessment: too small	
Green Infrastructure				
<p>The cliff top at Capel-le-Ferne is an important rural resource for recreation as witnessed by the national designations and the presence of the North Downs Way following the cliff top. The proximity of the Folkestone Warren SSSI provides for some overspill of flora and fauna, further enhancing the value of location. Development of this site, while not impeding the North Downs Way would result in a diminution of its intrinsic value, contrary to Policy CP7. It should be noted that the forthcoming England Coast Path will follow the North Downs Way in this location.</p>				
Proximity to Road Network SHLAA Score:				
<p>Old Dover Road is a 30mph narrow residential street. The site could accommodate direct frontage access for two properties in keeping with those in Dover Road. However, there are no footways along the road to link onto and therefore pedestrian safeguarding is considered poor.</p>				

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. A bus stop is within a five minute walk of the site; however the Primary School is a little further away, approximately a ten minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Any development at this location would have an adverse impact on the AONB, Heritage Coast and North Downs Way designations and be contrary to Policy CP7. For these reasons any development of the site would have detrimental impact on the landscape.

Consider for inclusion in the Submission Document?

No

Site Code CAP02	Address Land between Green Lane & Winehouse Lane, Capel-le-Ferne.	Parish Capel-le-Ferne	Overall SHLAA Score Not considered in the SHLAA as part of the site is located within the AONB	Area 6.82 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 205
Current Use SHLAA Score:				
Description of Site Currently a flat arable field, this site lies adjacent to the Primary School which is to the west. To the south west of the site, beyond Green Lane, is the Village Hall and associated open space. On the remaining boundaries lies open countryside. The majority of the site is located within the AONB, with the land lying outside of this designation (approximately one-fifth) located to the south west corner, adjacent to the Primary School.				
Policy Alignment SHLAA Score:				
The site lies outside of the settlement confines.				
Physical Constraints SHLAA Score:				
Part of the site is located within the AONB.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is flat and bounded by mature trees and hedgerow, although these are visually permeable. The SW frontage of the site is well related to the existing built form however the area of land to the northeast is remote. The land between the Primary School and the public footpath ER242 is not within the AONB. The remainder and majority of the site is within the AONB. Development here would result in harm to the AONB, not simply in land take, but the disposition of the land is such that there would be far wider visual impacts and harm to the local landscape character of the village edge.				
Biodiversity There will be biodiversity interest in the boundary features, which could provide connectivity for species movement across an otherwise inhospitable arable field system. It would be important to keep and enhance such features.				
EIA Screening: necessary due to location		Appropriate Assessment: need to contribute to the Thanet Coast mitigation strategy and there may also be impacts on the Folkestone to Etchinghill Escarpment SAC.		
Green Infrastructure The site is bounded to the northwest and partly on the southeast by public footpaths, ER242 and ER241 respectively, radiating from Capel-Le-Ferne, with a further footpath ER 243A splitting off from ER242. Green Lane, ER252, a bridleway runs along the SW boundary, enclosing the eastern village boundary. All the footways are popular and form an important network of recreational GI. While development, with careful design, need not adversely affect these routes, there would need to be a considerable investment in further GI to support the local population growth.				

Proximity to Road Network SHLAA Score:

The site has very poor access. Green Lane, to the south of the site, is little more than a track and Winehouse Lane, to the north, is a single carriageway. Neither would be suitable for a development of this size. The impact of this scale of development on the existing road network is likely to be unacceptable.

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Access to the site is poor as both rural lanes leading to the site are not suitable for development on this scale without significant improvements (Green Lane is little more than a track and Winehouse Lane is a single carriageway).

Any development, including the necessary highway improvements, would have an adverse impact on the AONB and its setting.

Recommend for inclusion in the Submission Document?

No

Site Code CAP03	Address Land to the north of the junction of Capel Street and Winehouse Lane, Capel le Ferne	Parish Capel le Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.29 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 8
Current Use SHLAA Score:				
Description of Site The site is located within the AONB and is partly rough grassland and unmanaged scrub. Telephone lines run along the frontage to Capel Street. A hedgerow/bank runs through the site in a north-south direction, providing the boundary to the open field to the east. To the south and west of the site lie existing residential properties which are located within the settlement confines, and to the north is Hollingbury Farm which lies outside of the settlement confines.				
Policy Alignment SHLAA Score:				
The site lies outside, but immediately adjacent to the settlement confines.				
Physical Constraints SHLAA Score:				
The entire site is located within the AONB.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact This small, flat site is divided by hedgerow. The site is situated within the AONB. The Capel Street frontage in this location is defined by low density 1930's housing reflecting the village edge. Limited development west of the hedgerow would be related to this existing built form, but would have to reflect the surrounding density, the design requirements of the AONB and be contained by the soft boundary. Development to the east (beyond the hedgerow) would be divorced from the existing settlement and impact adversely on the countryside AONB landscape.				
Biodiversity There may be some minor biodiversity interest in the grassland and hedgerow, in provision of habitat for common reptiles and passerine birds.				
EIA Screening: necessary because of AONB		Appropriate Assessment: too small to warrant consideration.		
Green Infrastructure Footpath ER243 radiates from the staggered crossroads on Capel Street across the corner of the site to join the complex of paths criss-crossing the fields north of Winehouse Lane. It would be essential that the ambience of this footpath and its contribution to the wider GI was kept, further reducing the available land for development.				
Proximity to Road Network SHLAA Score:				

Capel Street is a single track road which becomes more rural in nature as you go north.

Access should be achievable onto this site to serve a frontage development. However, there are no footways connecting to the site, with the footways on Capel Street ending at Capel-Le-Ferne Primary School. Pedestrian safeguarding is therefore considered to be poor and reliance on the private car likely.

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Part of the frontage of this site which is contained by existing hedgerow may have development potential subject to obtaining a satisfactory access to the site, which would appear to be achievable. Development of the area beyond the hedgerow to the east would have an adverse impact on the AONB. Development of the site with the removal of the hedgerow would be unacceptable. As a consequence, the site should be considered as a change of confines with a suggested capacity of 4 units.

Recommend for inclusion in the Submission Document?

Yes

Amend the settlement confines to include the land to the west of the hedgerow.

Site Code CAP01C	Address Extension of the northern village confines to include Hollingbury Farm, Capel-le-Ferne	Parish Capel-le-Ferne	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.98 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 29
Current Use SHLAA Score:				
Description of Site				
The site is located within the AONB. It comprises existing residential property on the southern part of the site together with a farmyard and associated buildings to the north. Beyond this to the north the A20 is located in a cutting. To the south the site has a boundary with CAP03. Not only is the site located within the AONB, but it is surrounded by the AONB on all sides.				
Policy Alignment SHLAA Score:				
The site lies outside of the settlement confines.				
Physical Constraints SHLAA Score:				
The site is located within the AONB.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
The buildings are low density and rural in character with no strong boundary line with the open field to the east. There is a distinct difference between this character and that of the 1930s properties on the opposite side of the road, which are included within the settlement confines. These are a higher density and are more urban in character.				
Landscape Impact				
The land gently rises to the south. It is contained to the north by the cutting of the A20. The site is a combination of farm buildings, houses and a small pasture. The area is within the AONB and becomes increasingly rustic to the north. Although the farm site is not particularly tidy, it is typical of the edge of villages and replacement with high-density housing would be detrimental to the landscape quality of the AONB. If the site were to be used for housing, it is probable that some farm facilities, in the form of grain stores etc. would have to be built elsewhere nearby in the AONB, with additional impact.				
Biodiversity				
The pasture beyond the existing farm buildings has mature trees and a pond. There may be species interest (bats, newts) as well as a more general biodiversity interest on the site, provided by the mature vegetation.				
EIA Screening: necessary due to location and size		Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy required. Potential in-combination impacts on Folkestone to Etchinghill Escarpment SAC.		
Green Infrastructure				
The site is relatively isolated and has no direct PROW links. The site would only support a limited biodiversity and, consequently, there is little existing GI that would have to be accounted for. Although within the AONB, the site is not located within the GI network and it is difficult to envisage development leading to any significant GI increase.				
Proximity to Road Network SHLAA Score:				

If development were proposed there could be difficulties in achieving satisfactory access to the site due to restricted visibility.

Capel Street is a single track road which becomes more rural in nature towards the north. Visibility should be achievable via a single point of access to the southern end of the site. However, there are no footways connecting to the site, with the footways on Capel Street ending at Capel-Le-Ferne Primary School. Pedestrian safeguarding is therefore considered to be poor and reliance on the private car likely.

Access to Services SHLAA Score:

Capel is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. Both a bus stop and the Primary School are located within a five minute walk of the site.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

The area requested to be included within the settlement confines is rural, rather than urban, in character and does not have a logical boundary line. There is no justification to expand the village confines as the character of the area is not contiguous with the rest of the village.

The inclusion of this land within the village confines would enable development. Development on this site would, however, be unsuitable as it would have a detrimental impact on the AONB. Access onto the site is also poor due to restricted visibility.

Recommend for inclusion in the Submission Document?

No

Shepherdswell

Site Code SHE01	Address Land to the rear of 23 Mill Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 32.5 (6-10 Years)	Area 0.42 Ha Indicative No. of units @ 30 dph = 13
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>The site is heavily treed, both along the boundary to the front and to the rear (north). The trees located alongside 23 Mill Lane are covered by TPOs. Beneath the trees is an area of scrub/ forest floor. Adjacent to the site's western boundary, where the land begins to slope away, is a smallholding where chickens are kept, and adjoining this to the west are horse paddocks. Beyond this is the Recreation Ground. This provides a very rural outlook. To the east the boundary is partly with existing residential properties and beyond this is undeveloped land submitted for consideration (see SHE01C). A public right of way runs along the sites western boundary.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The majority of the site is located outside of the settlement confines, with only the area required for access being located within the confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>The area is significantly wooded, not just along the boundary to the frontage of the site, but also to the rear. A number of these trees have been recently felled, but those alongside 23 Mill Lane are protected.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The site is close to the Conservation Area, however, due to the juxtaposition of buildings it is not considered that development would be detrimental to its setting.</p>				
<p>Landscape Impact</p> <p>The landscape is flat and wooded, particularly on the Mill Lane frontage where the trees are protected. This area of trees forms a boundary between the larger properties to the northeast and the tightly arranged village centre properties to the southwest. Development of this site would have a detrimental impact on the grain of the village as the removal of the trees currently play an important part in defining the character of the village and providing a separation between the older development and modern development. In addition the western boundary with the open rural landscape falls away significantly and any development is likely to be visible from afar.</p>				
<p>Biodiversity</p> <p>The site is heavily treed and the trees along the frontage are protected. The trees may provide foraging areas for bats and also be significant for birds.</p>				

EIA Screening	Appropriate Assessment	
<p>Green Infrastructure</p> <p>Footpath EE79 runs along the western boundary of the site while footpath EE78 runs along the northern boundary. Both footpaths are well-used by residents and EE78 is contiguous with the North Downs Way national trail. Therefore any development which impinges on the ambience of these paths must be carefully considered. Currently, the semi-wooded nature of the site is compatible with the break in the built form between the two 'arms' of Shepherdswell. Development of the site would, however, urbanise the approach from the north and be detrimental to the existing GI.</p>		
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>A public right of way runs alongside the site to the west. At present, the only possible access would be through heavily wooded area forming part of the curtilage to the property to the east of the site, and onto Mill Lane. This is not feasible given that the trees are protected.</p>		
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop, the primary school and GP surgery. In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.</p>		
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>		
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>		
<p>Analysis</p> <p>The site is effectively land locked as there is no suitable access, given that the trees on the front of the site, the only possible acceptable location for an access, are protected (with TPOs). Development of this site would also have an adverse impact on the wider landscape as well as changing the character and grain of the village.</p>		
<p>Consider for inclusion in the Submission Document?</p>		<p>No</p>

Site Code SHE04	Address 4 Mill Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 34.5 (6-10 Years)	Area 0.90 Ha Indicative No. of units @ 30 dph = 27
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site comprises an existing residential property together with its curtilage. This curtilage includes a hard tennis court, swimming pool, garden and an orchard area. The southern boundary is tree-lined and provides a soft edge to the rural landscape. A public right of way runs along the south western boundary. To the east, and on the opposite side of Mill Lane, lies existing residential development.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
The site is located outside, but immediately adjacent to the settlement confines. Half of the site lies within the Conservation Area.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment Half of the site is within the Shepherdswell Conservation Area and a number of neighbouring properties are Listed Buildings. The open nature of this conservation area is crucial to its special character and therefore development of the entire site (SHE04) would detract from the setting of the Conservation Area and adjoining Listed Buildings. A smaller area of land that only covers part of the site is considered in SHE04V.				
Landscape Impact The site falls away to the south from Mill Lane. The site is bounded by mature trees to all boundaries except Mill Lane. If any development was low rise, the impact on the landscape when viewed from a long distance would be limited, but it is doubtful that this could be compatible with the nearby listed buildings and the Conservation Area.				
Biodiversity The site includes a large house with several outbuildings and garden, extending to an area of orchard trees over grassland with pasture to the south. A bat survey would be required, as the site is in a good bat habitat area. Otherwise, there may be a limited biodiversity interest – such as common reptiles. A large ornamental pond is within the garden and a habitat suitability index for great crested newts would need to be determined. A biodiversity assessment should be undertaken to determine the quality of the pasture.				
EIA Screening: necessary due to site size <input type="checkbox"/> Appropriate Assessment: contribution to <input type="checkbox"/>				

	Thanet Coast SPA mitigation strategy required.	
<p>Green Infrastructure</p> <p>There is no significant GI currently on the site, although EE77, the North Downs Way, runs along the SW boundary. Development could provide an opportunity for creating a new recreational linkage to the North Downs Way. An approach such as this with provision of appropriate GI could be beneficial. However, development to the west of the site could have a detrimentally urbanising impact on the North Downs Way and pressure to reduce trees within neighbouring properties, including the closed churchyard.</p>		
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access onto Mill Lane is not suitable due to poor visibility. If the outbuilding closest to the road is removed then the landowner would need to demonstrate that adequate sight lines could be achieved. Access onto Mill Fields would be acceptable provided the total level of existing and proposed development did not exceed 50 dwellings. There is likely to be a capacity for around 23 dwellings. A footpath runs along Mill Lane.</p>		
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop, the primary school and GP surgery. In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.</p>		
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>		
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>		
<p>Analysis</p> <p>The low density and loose grain of the Conservation Area is very important in contributing to its special character. Developing this site for a large number of units would be detrimental to the setting of the Conservation Area and adjoining Listed Buildings.</p>		
<p>Consider for inclusion in the Submission Document?</p>		<p>No</p>

Site Code SHE04V	Address 4 Mill Lane, Shepherdswell (amended site)	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 34.5 (6-10 Years)	Area 0.25 Ha Indicative No. of units @ 30 dph = 7
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site comprises part of the curtilage associated with 4 Mill Lane. This amended site boundary includes the orchard and a long narrow outbuilding constructed of breeze blocks with a tile roof. To the immediate south is a hard tennis court which is located within the curtilage. A public right of way runs along the south western boundary. To the east, and on the opposite side of Mill Lane, lies existing residential development. The properties to the east are located within the settlement confines.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
The majority of the site is located outside, but immediately adjacent to, the settlement confines. The majority of the site lies within the Conservation Area. The only area outside of the Conservation Area is the small portion of land adjacent to No. 16 Mill Lane.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The majority of the site is located within the Shepherdswell Conservation Area and a number of neighbouring properties are Listed Buildings. The open nature of this conservation area is crucial to its special character and therefore any large-scale development would detract from the setting of the Conservation Area and adjoining Listed Buildings (see SHE04). If development were restricted to just one or two units then there may be an opportunity to enhance the Conservation Area with the removal of the outbuilding which fronts Mill Lane.				
Landscape Impact The site is relatively flat and fronts Mill Lane. Currently the site has a mixed visual impact, with a pleasant view across garden orchard contrasting with a nearby breezeblock sided garage/outbuilding. The site marks a transition between high density bungalow development and the larger plots of more substantial houses and any redevelopment would have to respect that.				
Biodiversity There would be some limited biodiversity, such as common reptiles, associated with the garden and the outbuilding would need to be assessed for bat roosting potential.				
EIA Screening: too small to be required		Appropriate Assessment: too small to be required.		
Green Infrastructure The site is isolated and there would be not realistic opportunity for development-based enhancement. Therefore, the site is considered to be GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site The site sits within a 30mph speed limit. There is a footway on the development side of Mill Lane. There are no traffic regulation orders on street in this area. Buses run along Mill Lane. Sight lines would be required at 43m x 2.4m x 43m. This may be achievable subject to all frontage development being				

removed on the site, particularly the concrete block building located at the back of the existing footway. Sight lines are likely to be achievable without crossing third party land.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop, the primary school and GP surgery. In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The low density and loose grain of the Conservation Area is very important in contributing to its special character. A small scale development, restricted to one or two units could be suitable for the site, subject to sensitive design and the use of appropriate materials.

Consider for inclusion in the Submission Document?

Yes

Site Code LDF018	Address Land off Mill Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 31 (11-15 Years)	Area 0.36 ha Indicative No. of units @ 30 dph = 10
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site is rectangular and fronts Mill Lane. At present the site is heavily overgrown, but perhaps was formerly an orchard. There is extensive tree cover to the frontage of the site. The site is surrounded by existing residential development on three sides, with open countryside on the south eastern boundary.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p> <p>The site is located within the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Whilst views into the site are very obscured, from the aerial photographs it is evident a number of trees are dotted throughout the site.</p> <p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>No considerations</p> <p>Landscape Impact</p> <p>The site is surrounded by built form on three sides, and therefore any landscape impact is likely to be minimal.</p> <p>Biodiversity</p> <p>The site is overgrown with ornamental and self sown trees on the boundaries and coarse grass throughout with occasional scrub (Google Earth 2007, accessed 2011). The site will support species associated with the urban fringe, including common reptiles, amphibians and small mammals. It will also provide nesting sites for birds.</p>				
EIA Screening: too small to be considered		Appropriate Assessment: too small to be considered.		
<p>Green Infrastructure</p> <p>Apart from biodiversity, the site offers little currently for GI. There is a PRow, ER97, which runs along the SE boundaries of some of the housing on Mill Lane but turns up into Sibert's Close and there would be little to gain from attempting to extend this to the site. Overall, the site is GI neutral.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>A footway runs along the frontage of the site. Mill lane is a very straight road, and the site is located within a 30 mph limit. Suitable visibility can be achieved from an access on the site frontage.</p>				

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score should reflect the proximity of a bus stop, the primary school and GP surgery all being within a five minute walk (i.e. a score of 6.0). In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site is located within the settlement confines and enclosed by built form on three sides. The rear of the site has a short boundary with an open field. Therefore, any development would have a limited impact on the landscape.

Consider for inclusion in the Submission Document?

Yes

Site Code SHE02	Address Land between 68 – 96 Westcourt Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 29 (+15 Years)	Area 1.53Ha Indicative No. of units @ 30 dph = 46
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>To the south of the site, nearest to Westcourt Lane there is a thick tree boundary. However, for any access to be achieved this would require at least partial removal. Moving north from the tree boundary is a relatively narrow area of scrub/trees, with the remainder of the field cropped (currently wheat). The land is undulating, rising to the north and west. The portion of the site put forward is put of a much larger field, and its northern boundary is not fenced or delineated in any manner. There are far reaching views across the landscape. Existing residential development lies to the south (on the opposite side of Westcourt Lane) and to the east of the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p>				
<p>The site is outside, but adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>There are electricity cables which run alongside the road.</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment No considerations</p>				
<p>Landscape Impact The site initially dips to the north and then rises up towards a wooded horizon. Any new development in this position would essentially be ribbon development and exacerbate the hard edge to the village and adversely impact on the countryside. The site is within 250m of the AONB, but is visually removed, by topography.</p>				
<p>Biodiversity No site-specific issues except for the tree boundary to the roadside which could provide a wildlife corridor. To the NE is a small copse that links to shaws that are characteristic of the woodlands in the Shepherdswell area. There could be some urbanisation impacts here and the biodiversity value of this woodland should be ascertained.</p>				
<p>EIA Screening: necessary due to size</p>		<p>Appropriate Assessment: Potential impact on the Lydden and Temple Ewell Downs SAC needs consideration and contribution to the Thanet Coast Mitigation Strategy v.3 would be necessary.</p>		
<p>Green Infrastructure The site is arable farmland, with a band of woodland along part of the frontage. The woodland will have</p>				

some biodiversity value. The farmland itself has limited potential for habitat creation.

There are no PRow associated with the site, although it would appear that the wider field boundary is a well-established informal footpath. There would be an opportunity for compensating for loss of roadside woodland by woodland planting to the west, screening the adjoining properties. Such planting would also reinforce screening of the AONB and would provide a biodiversity link between the shaws to the north of Westcourt Lane and those to the south.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

Access to the site would be from Westcourt Lane, which is a narrow road with only a short section with a footpath. Pedestrian safety is an issue on this road if this site were to come forward for development. Owing to the fact that the site is on the periphery of the village and there are no footways along this section of Westcourt Lane, pedestrian access to the centre of the village is poor. The southern boundary of the site would require the removal of trees to improve sight lines into and out of the site. The site is located within a 30 mph limit.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of the railway station where trains run frequently to both Dover Priory and to London Victoria. Both the primary school and GP surgery are further than five minutes walk. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Development of this site would serve to elongate the village, and more importantly would have a detrimental impact on the landscape. In addition, there are issues regarding pedestrian safety as there are only sporadic sections of footway linking site with the village centre. Third party land would be required to provide a continuous footway. Thus, if developed, it would encourage unsustainable travel patterns.

Consider for inclusion in the Submission Document?

No

Site Code NS01SHE	Address Land to the west of Coxhill, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 29.5 (+15 years)	Area 0.73 Indicative No. of units @ 30 dph = 21
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Roughly square in shape the site is bounded by existing residential development to the north and Botolph Street Farm to the south. The site slopes downwards to the west where there is no natural boundary. A small hedgerow runs along the roadside. The site forms part of a larger ploughed field. Open fields lie opposite the site to the east. A public right of way runs across the middle of the site from east to west.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site lies outside, but adjacent to, the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Telephone wires run along the road and the southern boundary with the farm access.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is reasonably well contained when viewed from Coxhill Road due to the roadside hedgerow. To the NW boundary of the site is a further hedgerow, beyond which is a gentle rise of some 300m to Twenty Acre Shaw and the edge of development along Westcourt Lane. The landscape is particularly characteristic of Shepherdswell. The site lies between farm buildings and terraced housing within the confines. Although the field layout is such that occupation of the whole site would seem appropriate, housing at the suggested density in this location would appear as an anomalous feature on the village edge. If only the frontage of the site was taken forward, however, this could yield the rear section of site unviable in agricultural terms without the removal of the NW hedgerow.				
Biodiversity The main biodiversity interest will be limited to hedgerows to the NW boundary and Coxhill Road. There may be concerns regarding urbanisation pressures on Twenty Acre Shaw LWS and AW. The roadside hedgerow should be replaced behind sightlines.				
EIA Screening: necessary due to size.		Appropriate Assessment: There would need to be consideration of the proximity of Lydden and Temple Ewell Downs SAC; and contribution to the Thanet Coast mitigation strategy would be required.		
Green Infrastructure The SW of Shepherdswell is endowed with a good PRow network which has a main NW-SE axis, comprising two footpaths ER87 and ER81, which by their usage comprise important recreational GI. ER81 bisects the site and its rural characteristics would be lost with development.				

About 300m from the site is Twenty Acre Shaw, a LWS which has recently been recognised as Ancient Woodland. Although currently well-used, housing at this site would increase urbanisation impacts. However, these are likely to be slight.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site sits just inside of the 30mph speed limit and sight lines are likely to be achievable. There are no footways on either side of the abutting carriageway at this location and footway provision will be required to the development side to connect with the existing footway further north fronting the terraced cottages. A public right of way crosses the site which will need to be maintained on its existing line or otherwise diverted. An established hedgerow fronts the site, which may need to be removed to achieve the sight line. Buses run along Westcourt Lane, which is within a reasonable walking distance. There are no traffic regulation orders on street in this area.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop and the primary school. The GP surgery is slightly further away, but is located within the village. In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site appears well contained, although part of the hedgerow is expected to require removal in order to achieve a satisfactory access. The PROW would either need to be incorporated or diverted as part of any development proposal. The integration of the PROW in an easterly direction to Moorland Road would enable connectivity to the Primary School. There are no overriding reasons why this site cannot come forward for development.

Consider for inclusion in the Submission Document?

Yes

New hedgerow required to soften impact of development (between site and farm buildings)

Site Code NS03SHE	Address Land at 50 Mill Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score 31 (11-15 years)	Area 0.74 ha Indicative No. of units @ 30 dph = 22
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A narrow lane separates this site from the rest of the village. The majority of the site comprises residential curtilage. As a consequence of its edge of village position the site is very rural in nature, which is compounded by a very rural outlook of sprawling open fields. To the north and east lies open countryside. Beyond the lane to the south lie existing residential properties located within the settlement confines, and on the opposite side of Mill Lane to the west lie existing residential properties which are outside of the settlement confines.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site is located outside, but adjacent to, the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is on a spur with extensive views SE across the valley to the edge of Waldershare Park and NE towards Eythorne. Northern views are bounded on the wooded ridgeline running N from Golgotha. Currently the boundary of the site is protected by mature trees, but without these development would appear highly incongruous and harmful to the landscape. As it proves extremely difficult to maintain such boundary protection over time, there would be the real risk of landscape damage through urbanisation of the village edge.				
Biodiversity The site appears to contain a large swathe of mown grassland, which could support common reptiles. The trees on the boundary would provide some biodiversity opportunities. However, the site location must severely limit any wider biodiversity interest.				
EIA Screening: required due to size		Appropriate Assessment: contribution to the Thanet Coast SPA would be required and there may be in-combination concerns regarding Lydden and temple Ewell SAC.		
Green Infrastructure The site is quite self-contained. PRow ER91 leaves Haynes Lane at the south corner of the site and this could be adversely impacted upon, visually, if the boundary vegetation were lost, but this is a minor consideration. The site is otherwise GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

The site is on the village fringe and unsustainable in walking terms to village amenities due to lack of footways and very narrow carriageway widths.

The site fronts a road subject to the National Speed Limit and is bounded by a high established hedgerow. It is unlikely that the required visibility could be achieved to this site due to poor road alignment requiring land outside of the applicant's control.

Access to Services SHLAA Score: 4.5 - Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop and GP surgery. A Primary School is located in the village, but would be a slightly longer walk. In addition the village has a railway station; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation ground.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Given that the site is located on the rural fringes of Shepherdswell it currently provides a transition to the rural area. Any intensification of development would not be suitable. This is compounded by the inadequate road alignment and not being able to achieve an acceptable access.

Consider for inclusion in the Submission Document?

No

Site Code SHE01C	Address Land to the rear of 25 Mill Lane, Shepherdswell	Parish Shepherdswell with Coldred Hierarchy Local Centre	Overall SHLAA Score Not scored in SHLAA as change of confine	Area 0.23 Ha Indicative No. of units @ 30 dph = 6
Current Use SHLAA Score:				
<p>Description of Site</p> <p>The site is heavily treed, both along the boundary to the front and to the rear (north). Adjacent to the site's western boundary, where the land begins to slope away, is a smallholding where chickens are kept, and adjoining this to the west are horse paddocks. Beyond this is the Recreation Ground. This provides a very rural outlook. To the northeast and south the boundary is with existing residential properties. The land to the southwest is undeveloped land submitted for consideration (see SHE01).</p>				
Policy Alignment SHLAA Score:				
<p>The site is located outside of the settlement confines, and has been submitted for consideration for and amendment to the settlement confines.</p>				
Physical Constraints SHLAA Score:				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The site is close to the Conservation Area, however, due to the juxtaposition of buildings it is not considered that development would be detrimental to its setting.</p>				
<p>Landscape Impact</p> <p>The site is generally flat and currently, its semi-wooded nature of is compatible with the break in the built form between the two 'arms' of Shepherdswell. Development of the site would, however, urbanise the approach from the north and be detrimental to the existing landscape setting. In addition the western boundary with the open rural landscape falls away significantly and any development is likely to be visible from afar.</p>				
<p>Biodiversity</p> <p>The trees may provide foraging areas for bats and also be significant for birds.</p>				
EIA Screening: too small to consider		Appropriate Assessment: too small to consider		
<p>Green Infrastructure</p> <p>The national trail, The North Downs Way (PRoW EE78) runs along the northern boundary and any development that was detrimental to the ambience of this route and detracted from its use should be resisted.</p>				
<p>Proximity to Road Network SHLAA Score:</p> <p>The site has not been submitted with any possible access option, therefore it is landlocked.</p>				
<p>Access to Services SHLAA Score:</p> <p>Shepherdswell is designated as a Local Centre in Policy CP1 of the adopted Core Strategy. The SHLAA score reflects the proximity of a bus stop, the primary school and GP surgery. In addition the railway station is less than ten minutes away; trains run frequently to both Dover Priory and to London Victoria. Other services available in Shepherdswell include a Village Hall, shop, public houses and a recreation</p>				

ground.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

The site is effectively land locked as there is no suitable access. Development of this site would also have an adverse impact on the wider landscape, including the North Downs Way, as well as changing the character and grain of the village.

Consider for inclusion in the Submission Document?

No

Site Code ALK01	Address Land to the south of Short Lane, to the east of Beachwood, Alkham	Parish Alkham	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.17 Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 5
Current Use SHLAA Score:				
Description of Site				
<p>The site lies at bottom of Short Lane. It is generally flat in nature, forming part of the valley floor. Cut wood is being stored on the site, whilst the remainder is scrub. The site's northern boundary has a sporadic hedgerow, beyond this is a small road used as a public path (as shown on OS maps). To the south is open countryside, and to the west existing residential properties (within the confines)</p>				
Policy Alignment SHLAA Score:				
<p>The site is located outside, but immediately adjacent to the settlement confines.</p>				
Physical Constraints SHLAA Score:				
<p>The site is located entirely within the AONB.</p>				
Flood Risk				
<p>The majority of the site falls within flood zone 3; in the first instance alternative sites should therefore be explored for residential development. If there is no alternative site then any development would have to ensure that sleeping accommodation is not located on the ground floor. This would have an impact on the design and layout of the built form.</p>				
Historic Environment				
<p>The site has been subject of a previous planning application (DOV/98/00371) which was refused and then dismissed at appeal. The Inspector concluded that the erection of a house and the cultivation and use of the site as a domestic garden would visibly urbanise its character and appearance which would harm the countryside setting of Alkham and erode the natural beauty and character of the landscape in the AONB and SLA. The Inspector also commented that if the site were allowed then it would be difficult for the Council to resist proposals for the development of the field between the site and the low cost housing to the north, which would have a further detrimental effect on the landscape designations.</p>				
Landscape Impact				
<p>The site, which is located at the eastern edge of the built up village of Alkham, is rough grassland with substantial scrub to its boundaries. The site is within the AONB. The site is highly visible from Alkham Valley Road due to its position in a valley. Any development on this site would have an adverse impact on the AONB.</p>				
Biodiversity				
<p>There will be some biodiversity potential associated with the grassland and scrub, such as common reptiles Bats may use the site for foraging. Proximity of the temporary watercourse could further enhance the potential for wildlife, such as amphibians, but biodiversity is not considered to be a constraint on development.</p>				
EIA Screening: necessary due to location		Appropriate Assessment: too small.		
Green Infrastructure				

There are no PRoWs nearby and biodiversity interests will be restricted. Harm to the AONB would indicate that development would also be adverse to GI and against policy CP7.

Proximity to Road Network SHLAA Score:

The site is accessed via Short Lane. The road is subject to a 30mph speed limit. Sight lines are likely to be achievable. There is no footway on the eastern side of Short Lane but there is a footway on the western side of the carriageway. However, Short Lane is suitable to serve a maximum of 50 units and there are already 47 units.

Access to Services SHLAA Score:

Alkham is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site, although the service is infrequent. There is not a school in the village, the nearest is in River or Temple Ewell. Alkham has a Public House, Village Hall and Church.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Although it is possible to achieve satisfactory sight lines, the capacity of Short Lane is restricted to 50 units, and already serves 47. The maximum number of units which could be served is 3. However, any development of this site would have a detrimental impact on the AONB. The site also falls within a flood risk area and alternative sites should be considered in the first instance. Although there are design solutions that could to overcome this, they could exacerbate the visual impact of any development. In addition, there may be loss of biodiversity if the site was developed.

Consider for inclusion in the Submission Document?

No

Site Code ALK01C	Address Land to the rear of Fair Acres, Alkham Valley Road, Alkham.	Parish Alkham	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.12 Ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 3.6	
Current Use SHLAA Score:				
Description of Site				
<p>Adjacent to a former piggery, the site is appears to have remnants of a building. The site is currently accessed via a shared drive with Fair Acres, a property which is located to the south of the site. The site is roughly square in shape and slopes steeply to the north. There is open countryside to the north, and the garden of Stanford to the west.</p>				
Policy Alignment SHLAA Score:				
<p>The site is located outside, but immediately adjacent to the settlement confines.</p>				
Physical Constraints SHLAA Score:				
<p>The site is located within the AONB.</p>				
Flood Risk				
<p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
Historic Environment				
<p>The current settlement confines include the garden of Fair Acres but excludes the area of land which has been put forward. The site is approximately 20 metres from the Alkham Conservation Area. Any development of the site would be against the existing urban grain in this part of Alkham.</p>				
Landscape Impact				
<p>The site is adjacent to the former piggery and its related paraphernalia. The site falls within the AONB. The topography of the Alkham Valley is sensitive to any development in terms of the relationship between its built form and the valley character. This site would be prominent if developed and would have an adverse impact on the AONB and Alkham Valley.</p>				
Biodiversity				
<p>The site appears to be rough grassland (Google Earth 2007, accessed 2011) with trees to the northern boundary. It may be contiguous with the neighbouring neutral grassland of Sladden Farm. It is likely to support common reptiles and could form an important foraging route for bats.</p>				
EIA Screening: necessary due to location		Appropriate Assessment: too small.		
Green Infrastructure				
<p>PRoW ER163 just touches the N boundary. Development would have a minor adverse impact on this recreational path. The impact on the AONB would be contrary to policy CP7.</p>				
Proximity to Road Network SHLAA Score:				
<p>If development were proposed, access could only be gained from the piggery/ Fair Acres entrance onto Alkham Valley Road. This access is not suitable to serve any additional development due to restrictive visibility on to the Alkham Valley Road.</p>				

Access to Services SHLAA Score:

Alkham is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site, although the service is infrequent. There is not a school in the village, the nearest is in River or Temple Ewell. Alkham has a Public House, Village Hall and Church.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Alkham is located within the AONB and is sensitive to any development. The extension to the village confines would provide the potential for development and could lead to an incremental erosion of the traditional village edge and have a detrimental impact on the AONB. In addition, the site does not have a suitable access.

Consider for inclusion in the Submission Document?

No

Site Code ALK02V	Address Hill View House, Short Lane, Alkham (inclusion of access)	Parish Alkham	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.27ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 8	
Current Use SHLAA Score:				
Description of Site Roughly triangular in shape, the site comprises undeveloped garden land with mature trees, adjacent to the Sports Ground. Part of the Sports Ground, but not the land immediately adjacent to the site, is located within the conservation area. Hogbrook Equestrian Centre is located to the south, and Hogbrook Farm to the west. Adjacent to the east of the site is the garden associated with Hillview and beyond this are four other residential properties. The settlement confines include the dwelling for Hillview, but exclude its garden.				
Policy Alignment SHLAA Score:				
The site is located outside of the settlement confines.				
Physical Constraints SHLAA Score:				
The site is located within the AONB.				
Flood Risk Part of the site is located within Flood Zone 3. Alternative sites should be considered in the first instance.				
Historic Environment This varied site boundary, to include the access, means that part of the suggested access lies within the Alkham Conservation Area. If the confines were extended and then the site was put forward for residential development, depending on the number and scale of development, then this would have a detrimental impact on the setting of the Conservation Area. The Conservation Area encompasses the sports ground providing an important setting for the buildings located within the Conservation Area. Whilst the submitted site, is located to the south and outside of the Conservation Area, it nevertheless is important to the setting of the Conservation Area and any development of the site should be heavily resisted.				
Landscape Impact The site lies on slightly rising ground to the south of the village green. It is very discrete behind hedging and mature trees. Development here would necessitate removal of some of the boundary planting resulting in an adverse impact on setting of the village in partly exposing the centre of the village, the green, to the more modern housing in Short Lane.				
Biodiversity It is probable that bats forage along the boundaries. The shading of the site indicates a low probability of it supporting common reptiles. Development would probably be neutral in respect of biodiversity.				
EIA Screening: necessary due to location		Appropriate Assessment: too small.		
Green Infrastructure				
PRoW ER165 passes from the green close to the boundary to the site. However, further to the east it has to pass in a tight corridor between properties on Short Lane before accessing the countryside and development of this site would only have a minor additional adverse impact on the ambience of the				

recreational walking experience. Development in the AONB is contrary to Policy CP7.

Proximity to Road Network SHLAA Score:

The site is accessed via a private driveway off Short Lane. The driveway already serves 4 properties. It is Kent's policy not to serve more than 5 properties from a private drive. In order to serve two or more additional properties the access road would need to be laid out to an adoptable standard. There is a footway on the western side of Short Lane but this does not extend to the site. In addition, Short Lane is suitable to serve a maximum of 50 units and there are already 47 units within the development.

Access to Services SHLAA Score:

Alkham is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site, although the service is infrequent. There is not a school in the village, the nearest is in River or Temple Ewell. Alkham has a Public House, Village Hall and Church.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

In order to achieve a suitable access the road would need to be laid out to an adoptable standard. However, the capacity of Short Lane is restricted to 50 units, and already serves 47. Therefore, given the capacity restriction the scale of development would be restricted to three units. If in order for the site to be developed a number of trees would need to be removed then this should be heavily resisted since it would have a detrimental impact on the setting of Alkham. From an urban design perspective any development would be out of place given the existing urban grain, including the large garden associated with Hillview. Furthermore a portion of the site is located within Flood Zone 3 and development should be resisted.

Consider for inclusion in the Submission Document?

No

Site Code NS01ALK	Address Malmains Farm Land, Alkham Road, Alkham	Parish Alkham	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 9.5 ha	
		Hierarchy Village	Indicative No. of units @ 30 dph = 285		
Current Use SHLAA Score:					
Description of Site					
<p>This large site comprises agricultural land, and for the majority is surrounded by open countryside on three sides. The exception to this is to the east where the site is bounded by existing residential development. The entire site is located within the AONB. Any development of the site would have a detrimental impact on the setting of the AONB, especially at the scale of development which has been put forward. The site is visually prominent and is very open to the north, where the land rises. The site fronts the Alkham Valley Road, which is a busy route; traffic is restricted to 40mph however this reduces to 30mph on entering the village. Part of the frontage, closer to the village is open (i.e. there is no visual screening), but the remainder is bounded with mature trees.</p>					
Policy Alignment SHLAA Score:					
<p>The site is located outside of the settlement confines and within the AONB.</p>					
Physical Constraints SHLAA Score:					
<p>Land rises to the north.</p>					
Flood Risk					
<p>A small portion of the front of the site is located in Flood Zone 3. The remainder is located within Flood Zone 1 which would be appropriate for residential development.</p>					
Historic Environment					
<p>Given the size of the site submitted any development would be out of keeping with the existing built form of the village.</p>					
Landscape Impact					
<p>The proposal is for a major development in a very prominent position in the AONB, contrary to PPS7 and CS Policy CP7. There would appear to be no possibility of mitigating the extremely adverse landscape impact that would result from development on this site.</p>					
Biodiversity					
<p>The site has recently be converted from grassland to arable and it is unlikely that there would be any significant biodiversity interest.</p>					
EIA Screening: essential		Appropriate Assessment: a number of European sites would have to be considered, both by this proposal alone and also in combination with other developments in Dover.			
Green Infrastructure					
<p>The current importance in the site lies in its landscape quality and contribution to the AONB. While development may offer GI such as recreational facilities, SUDs etc., it is considered that none of this could overcome the harm to Dover GI.</p>					
Proximity to Road Network SHLAA Score:					

The Alkham Valley Road is one of the main routes into Dover, the site fronts a 40mph carriageway which changes to a 30mph on the approach to Alkham village.

A footway exists on the northern side. Sight lines may be achievable depending on the position of the access. The site is on a bus route but local amenities are few. The site is not considered sustainable in highway terms.

Access to Services SHLAA Score:

Alkham is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site. There is not a school in the village, the nearest is in River or Temple Ewell. Alkham has a Public House, Village Hall and Church.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Development of the whole site would have a detrimental landscape impact, especially given the site is located within the AONB. The site would be unsuitable for future development, particularly at the scale put forward. Any development would be out of keeping with the existing built form and would change the character of the village. Furthermore the site is considered unsustainable from a highway perspective.

Consider for inclusion in the Submission Document?

No

Site Code NS03ALK	Address Land East of Short Lane, Alkham	Parish Alkham	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 0.57 ha	
		Hierarchy Village	Indicative No. of units @ 30 dph = 17		
Current Use SHLAA Score:					
Description of Site The site lies to the south of an affordable housing scheme comprising eight dwellings which lies outside of the settlement confines. To the west lies existing residential development which is located within the settlement confines. The land slopes in a southerly direction and part of the southern portion of the site is located in Flood Zone. A bridleway is located to the south of the site, and beyond this a site submitted as ALK01 to the east lies open countryside.					
Policy Alignment SHLAA Score:					
The site is located outside of the settlement confines and within the AONB.					
Physical Constraints SHLAA Score:					
Flood Risk Approximately one third of the lower part of the site is located in Flood Zone 3; in the first instance alternative sites should therefore be explored for residential development. If there is no alternative site then any development would have to ensure that sleeping accommodation is not located on the ground floor. This would have an impact on the design and layout of the built form. Historic Environment No considerations Landscape Impact The site is located within the AONB and therefore any development is contrary to Policy CP7. There would be an adverse visual impact to users of the Alkham Valley Road and the Restricted Byway ER 177 that traverse the southern side of the valley. Development would lead to a coalescence of the eastern boundary to Alkham, a feature that is atypical for settlement in the valley. Biodiversity Biodiversity interest are likely to be limited and associated with the peripheral grassland, hedging and scrub – birds and common reptiles					
EIA Screening: required due to location		Appropriate Assessment: at 17 dwellings, there would be a requirement to contribute to the Thanet Coast SPA mitigation strategy			
Green Infrastructure The major GI component is the landscape setting, which development would harm.					
Proximity to Road Network SHLAA Score: The site is accessed via Short Lane. Short Lane is a 30mph road and sightlines are likely to be achievable. There is no footway on the eastern side of Short Lane but a footway exists on the western side of the carriageway. However, Short Lane is suitable to serve a maximum of 50 units and there are already 47 units within the development. Public rights of way cross/about the site which must be retained on their existing line or otherwise diverted.					

Access to Services SHLAA Score:

Alkham is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site, although the service is infrequent. There is not a school in the village, the nearest is in River or Temple Ewell. Alkham has a Public House, Village Hall and Church.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Although it is possible to achieve satisfactory sight lines, the capacity of Short Lane is restricted to 50 units, and already serves 47. Therefore, there is not sufficient capacity for the scale of development envisaged. The site is located within the AONB and therefore any development of the site would have a detrimental landscape impact. Part of the site falls within a flood risk area and alternative sites should be considered in the first instance. Although there are design solutions that could to overcome this, they could exacerbate the visual impact of any development

Consider for inclusion in the Submission Document?

No

East Langdon

Site Code SHL035 (LAN01)	Address Site north of Langdon Primary School, East Langdon	Parish Langdon	Overall SHLAA Score 25 (Undeliverable)	Area 0.33 Ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 9	
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular site consisting of unmanaged dense scrub. The site is located at the end of a residential cul-de-sac and is surrounded by existing residential development to the south, the Primary School to the west and agricultural land to the north and east. The land to the east has been submitted for consideration (reference SHL086).				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site lies outside, but adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site comprises dense scrub and trees and it is highly visible in the wider landscape. Development of the site could therefore have a detrimental affect on this landscape designation by virtue of introducing built form further into the countryside, against the grain of the existing settlement. With protection of boundary features, however, there may be a possibility for a less dense form of development.				
Biodiversity The site will support a variety of wildlife, such as birds and possibly, foraging for bats. The site is densely scrubbed over and with management there could be enhanced biodiversity. Development is likely to be neutral in overall biodiversity by encouragement of garden-dwelling species.				
EIA Screening: too small to need consideration		Appropriate Assessment: too small to be required.		
Green Infrastructure Footpath ER 44 runs on higher ground SW-NE within 75m of the site and appears to be a popular linking path between the village, the recreation ground (via an informal extension) and Martin. There would be a minor adverse impact should the whole of this site be developed.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site The site does not have an established vehicular access. The creation of an access from West side would be acceptable, subject to possible parking/turning rights. Single access developments are limited to 50 dwellings. As West Side already serves 20 dwellings, any new development would be limited to 30 dwellings.				
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk				

The site lies adjacent to Langdon Primary School. Bus services provide connections to Dover, and there is a railway station, located in Martin Hill, just under a kilometre away. In addition a Post Office operates from the Village Hall, which is within a five minute walk of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Development of the site would be against the existing urban grain and any development would introduce built form into the countryside.

However there is the potential for 10 units to be developed at this site, subject to landscaping to reduce any detrimental impact on the wider landscape. Access for this number of units would be achievable.

Consider for inclusion in the Submission Document?

Yes

Site Code SHL044	Address Site at Langdon Court Farm, East Langdon	Parish Langdon	Overall SHLAA Score 26 (Undeliverable)	Area 0.63 Ha
		Hierarchy Village		
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site Irregular shaped site consisting of farmyard to the rear of existing properties. The northern part of the site consists of single storey farm units. There is managed grassland at the southern half where the access to the wider road network is. The residential buildings of Langdon Court lie to the west, with open fields to the north and east. To the south lie existing residential properties located within the settlement confines of East Langdon.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site lies outside, but adjacent to, the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Power lines cross the site.</p>				
<p>Historic Environment The site is adjacent to two Listed Buildings and the majority of the site is within a Conservation Area. Langdon Court, to the west of the site, is a Grade 2 Listed farmhouse. The collection of farm buildings to the north east of Langdon Court are modern, and not appropriate for conversion. The open nature and farmyard setting of this site makes a very important contribution to the setting of Langdon Court. Any residential development on this site would detract from its setting.</p>				
<p>Landscape Impact The site is located on the northern edge of the village but is located close to the centre of the village, including the village green, which is characterised by large buildings in spacious grounds. As with SHL035, the introduction of a denser form of development would be against the grain of the village, but in this case the character of older settlement would also be harmed.</p>				
<p>Biodiversity There is a pond within the vicinity of the site so there could be Great Crested Newts, although recent redevelopment of this pond and the lack of records in this part of Dover would suggest these do not occur here. The existing farm sheds could contain bats. A bat survey would be required for any development.</p>				
EIA Screening: required due to number.		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required.		
<p>Green Infrastructure As with SHL035, the site is visible from nearby footpaths (in this case, ER44 and ER45), although the backdrop of the village would suggest that there would not be a significant loss in ambience. Development of the site would not contribute to GI, and the proposal is, therefore, neutral.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site An acceptable road access could be established but this would be onto a country lane. There may also be an issue with junction spacing so any development would require a Traffic Statement indicating the level of traffic now and after development. The access runs down the side of an existing property. There</p>				

could be amenity issues with this. An access could likely be achieved but it would need to be demonstrated by the development promoters.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site lies within a five minute walk of Langdon Primary School. Bus services provide connections to Dover, and there is a railway station, located in Martin Hill, just under a kilometre away. In addition a Post Office operates from the Village Hall, which is also within a five minute walk of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is in an inappropriate location and if developed, would not follow the grain of the village, resulting in back land development. Development would, therefore, not protect or enhance the setting of the Listed Buildings or Conservation Area. The open nature and farmyard setting of this site makes a very important contribution to the setting of Langdon Court. Any residential development on this site would detract from its setting.

Recommend for inclusion in the Submission Document?

No

Site Code SHL086	Address Land adjacent to Langdon Court Bungalow, The Street, East Langdon	Parish Langdon	Overall SHLAA Score 29.5 (+15 Years)	Area 1.39Ha
		Hierarchy Village		
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
Description of Site Rectangular site consisting of agricultural land and, at the southern corner, a residential property. The site rises to the north with hedgerows and trees on its boundary line. There is a telegraph line running along the northern boundary. To the north and east is open countryside, with land to the west submitted for consideration (reference SHL035). Opposite the site, to the south lies the Village Hall – where a Post Office operates from.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
The residential property is within the settlement confines. The field (the majority of the site) is outside.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site is close to the Conservation Area but any development would not have an adverse impact on it.				
Landscape Impact The site lies on the edge of the settlement in a highly visible location, the land rising towards the NW, enclosed by hedgerows and paths. Development of the whole site would be against the grain of the existing settlement and be of such size as to alter its overall character and setting within the wider landscape. Additionally, the remaining undeveloped land would appear somewhat unusual in the locality in terms of it being a landscape component.				
Biodiversity There is a significant Ash tree on roadside on the eastern corner of the site. Other biodiversity limited to the hedgerows. Development could lead to some enhancement, particularly if associated with swales.				
EIA Screening: necessary due to number of dwellings proposed.		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required.		
Green Infrastructure Although the site is close to an existing footpath, ER44, it would not be accessible. The topography of the site would require measures to reduce surface water flooding risk, although if swales were used, these could provide a biodiversity enhancement. To create an acceptable access there would be a requirement for a loss of hedgerow and embankment on the road frontage and this would have a tendency to urbanise the character of the village entrance to the detriment of the wider countryside.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				
An acceptable access could be created but this would require the hedgerow to be removed. A public footpath runs along the northern boundary line but is not within the site. A footpath would need to be extended to reach the site.				
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk				

The site lies within a five minute walk of Langdon Primary School. Bus services provide connections to Dover, and there is a railway station, located in Martin Hill, just under a kilometre away. In addition a Post Office operates from the Village Hall, which is located immediately to the south of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The development of the whole site and location of the site on the edge of the village would have a detrimental impact on the setting of the village. The removal of the hedgerow for a suitable access would introduce a hard urban form in a rural location.

Consider for inclusion in the Submission Document?

No

East Studdal

Site Code LDF041 (SUT02)	Address East Studdal Nursery, Downs Road	Parish Sutton Hierarchy Village	Overall SHLAA Score 28.5 (+15 Years)	Area 1 ha Indicative No. of units @ 30 dph = 30
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
Description of Site An irregular shaped site located at the eastern end of East Studdal. The site is used as a nursery and, with the exception of a dwelling house used for the business, has greenhouses on the majority of the land. The boundary of the site consists of mature hedgerow/confiners. To the east and west of the site there are residential properties. To the north and south there are open fields.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation The frontage of the site is within the settlement confines. The remaining part of the site is outside the confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment Development along Downs Road comprises ribbon development and some properties have large rear gardens. Development of the whole site would introduce development to the rear of the line of existing residential properties, which would be against the grain of this part of the village. The site is, however, well contained (please see below) and would not have a detrimental impact on the street scene. Landscape Impact The site is well screened behind hedging/trees along the north and west boundary line. Although development would be against the grain of the existing development, the site is well contained by mature trees. Any development would have to ensure that it retained the mature treescape and the soft edge to the village. Biodiversity There is unlikely to be significant wildlife interest and that would be associated with the boundary features.				
EIA Screening: Necessary due to size.		Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would be necessary.		
Green Infrastructure There are no PRoW in the location and the site can only open onto Downs Road, so there can be no significant contribution to recreational GI. Development may provide a slight biodiversity enhancement through gardens. The fall of the land is such that while SUDs is advocated on GI grounds, there is little risk of surface water flooding from land use change. Overall, the site is GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site There is an existing entrance into the nursery. It would be possible to achieve an acceptable highway access off Downs Road but this would involve the removal of the hedge along the site frontage to improve visibility splays. The removal of the hedge would conflict with landscape impact mitigation, but planting a semi-mature replacement behind the visibility splay may be possible. A traffic impact study				

may need to be undertaken to assess the use and speed of existing highway traffic.

Access to Services SHLAA Score: 1.0 – Site with no public transport, GP surgery and school within 10 minutes walk
There is a bus stop at the western end of the village but this would be just over ten minutes walk away. The settlement did have a shop but this has closed down.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Development of the site would be against the grain of the village but the site is well contained behind the existing trees/hedgerow, which runs the length of the boundary. A suitable access to serve the envisaged number of dwellings can also be established. The site, therefore, has potential for development.

Consider for inclusion in the Submission Document?

Yes

Retention or replacement of hedgerow/trees on boundary line

Site Code SHL017 (SUT08)	Address Land to the south of Downs Road, East Studdal (The Follies)	Parish Sutton Hierarchy Village	Overall SHLAA Score 23.5 (Undeliverable)	Area 1.44 Ha Indicative No. of units @ 30 dph = 43
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site An irregular shaped site located south of Downs Road on the edge of the village. The site is on rolling downland, gently dropping to the east and west. The site is open with only a few trees or shrubs along the boundary. There are residential properties to the north along Downs Road, a horse paddock to the west and open fields to the south and east. The site is currently used for pig farming. There is a track located on the eastern side of the site, which leads to the only access to Downs Road.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The northern boundary is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment East Studdal is primarily a ribbon development along Downs Road. Any intrusions into the countryside to the south are mainly by extensive gardens associated with road frontage houses. Development of this site would be against the grain of the village and, as the site is open, would have a detrimental impact on the setting of the village.				
Landscape Impact The site is on rolling downland, dropping down to the west. It is contained on the western boundary by pasture and occasional trees and to the south by hedgerow. Development of this site would be highly visible from surrounding areas particularly from the north and west and would introduce an anomalous and unwelcome intrusion into the open countryside.				
Biodiversity There would be only a limited biodiversity interest.				
EIA Screening: Necessary due to size		Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would be necessary		
Green Infrastructure There are no PRow in the locality of this site and recreational walking paths could not be developed. Biodiversity opportunity is limited. Development would have to introduce SUDs to reduce risks of surface water flooding in the village. Overall the site is GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site There is an existing entrance onto the site, but this is for a track. Whilst it would be possible to achieve an acceptable highway access off Downs Road, a traffic impact study would be need to be undertaken to assess the use and speed of existing highway traffic. If it involves over 50 units, an emergency access would be required.				

Due to the location of the site, any residential development would require the creation of pedestrian footways within and beyond the site.

Access to Services SHLAA Score: 2.0 – Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk

East Studdal is designated as a Village in Policy CP1 of the Core Strategy. There are a limited number of services, with the shop recently shutting. A bus stop is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although a suitable access could be established there is an overriding objection from a landscape perspective due to the detrimental impact of development on the setting of the village and on the wider landscape. Any development of this site would be against the existing urban grain and should therefore be resisted.

Consider for inclusion in the Submission Document?

No

Site Code SHL009	Address Land off Downs Road, East Studdal	Parish Sutton Hierarchy Village	Overall SHLAA Score 24 (Undeliverable)	Area 0.72 Indicative No. of units @ 30 dph = 21
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A flat, rectangular site located south of properties fronting Downs Way and south east of Downs Close. The site consists completely of scrub and has fields to the east, south and west.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The northern boundary is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed There is a telegraph pole where the site joins Downs Road. This may have to be moved if access improvements are required.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site protrudes into the countryside. Development of the site would, therefore, be against the grain of the existing settlement and would have a detrimental impact on the setting of the village.				
Landscape Impact If the site was developed, this would introduce a finger of urban form into the countryside. Although the site is discrete, this would have a detrimental impact on the wider landscape				
Biodiversity The site appears to have been unmanaged for some years and is developing into woodland with scrub and coarse grassland (Google Earth, 2008, accessed 2011). As such, it probably represents a refuge for biodiversity in an otherwise predominantly agricultural landscape. Surveys would have to be undertaken for use of the site by birds and bats. Common reptiles may occur in the grassland areas. A tree survey would be necessary.				
EIA Screening: Necessary due to size		Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would be necessary		
Green Infrastructure There are no PRow in the locality of this site and recreational walking paths could not be developed. Biodiversity opportunity needs assessment. Development would have to introduce SUDs to reduce risks of surface water flooding to frontage properties.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site A road access could be established from Downs Close but there is a telegraph pole on the eastern side of the access which may need to be moved. There are footways on Downs Close and Downs Road which could be connected up to the site. The nearest bus stop is on Downs Road and there are pedestrian footways to it.				
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery				

and school within 5 minutes walk

East Studdal is designated as a Village in Policy CP1 of the Core Strategy. There are a limited number of services, with the shop recently shutting. A bus stop is located within a five minute walk of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Whilst an access to the site is achievable, any development would be against the grain of the village, and would introduce an urban 'finger' into the countryside. This would have a detrimental impact on the wider countryside and the setting of the village.

Consider for inclusion in the Submission Document?

No

Site Code SHL016 (SUT01)	Address Land to the south of Downs Road, East Studdal	Parish Sutton	Overall SHLAA Score 20.5 (Undeliverable)	Area 1.24 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A long irregular shaped site, used for grazing horses, located south of Downs Road. The site falls gently to the west. The site has hedgerows along the western and southern boundaries. To the north and west there are residential properties. To the south and east there are open fields (one is used for pigs).				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site lies outside, but adjacent to, the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact East Studdal is primarily a ribbon development along Downs Road. Any intrusions into the countryside to the south are mainly by extensive gardens associated with road frontage houses. The site is on rolling downland, dropping down to the west. It is contained on the western boundary by village development and to the south by hedgerow. Development of this site would be highly visible from surrounding areas particularly from the north and east and introduce an anomalous and unwelcome intrusion into the open countryside. This would be against the grain of the development of the village, changing its character, and would have an adverse impact on its setting.				
Biodiversity There is likely to be a minor biodiversity interest associated with the hedgerows and horse pasture.				
EIA Screening: necessary due to size.		Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would be necessary		
Green Infrastructure There are no PRoW in the locality of this site and recreational walking paths could not be developed. Biodiversity opportunity would be limited. Development would have to introduce SUDs to reduce risks of surface water flooding to frontage properties.				
Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility Downs Road is a 30mph road. There are no pedestrian footways along this section of Downs Road to connect onto and therefore pedestrian safeguarding is considered to be poor. Visibility is limited and to achieve sightlines third party land would likely be required. The nearest bus stop is to the west of the site on Downs Road but as stated there are no pedestrian footways linking to this.				
Access to Services SHLAA Score: 2.0 – Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk				

East Studdal is designated as a Village in Policy CP1 of the Core Strategy. There are a limited number of services, with the shop recently shutting. A bus stop is located within a ten minute walk of the site.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although a suitable access could be established there is an overriding objection from a landscape perspective due to the detrimental impact of development on the setting of the village, its character, and the wider landscape.

Consider for inclusion in the Submission Document?

No

Site Code SHL005 (inc SUT06)	Address Land south west of Fieldings, Stoneheap Road, East Studdal	Parish Sutton Hierarchy Village	Overall SHLAA Score 24 (Undeliverable)	Area 0.2 Ha Indicative No. of units @ 30 dph = 12
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A rectangular site located north of East Studdal consisting of a mixture of residential (to the north of the site), coach parking and two small paddocks (to the south). The site boundary treatment consists of mature trees and hedgerows. The site gently rises to the east but the site is higher than the Stoneheap Road (running along the north western boundary). There are low density residential properties on the opposite side of this road. To the north east, south east and south west, there are fields.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is divorced from the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed The site has numerous trees and hedgerows within the site.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is flat and slightly raised above the road level. The general characteristics of fields in this area are of small village edge paddocks. Development here would damage that fabric and have an adverse impact on the village setting and the wider landscape.				
Biodiversity There is likely to be biodiversity interest in terms of bats and birds associated with the boundary vegetation and discrete feeding areas within the site. Surveys would need to be undertaken.				
EIA Screening: too small to be necessary		Appropriate Assessment: too small to be necessary.		
Green Infrastructure There is a PRoW, footpath EE423, coming onto Stoneheap Road a short distance to the north of the site. This appears lightly used. Development at the site would not lead to any significant improvements in recreational GI and there may well be a small loss in biodiversity.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site A suitable access could be achieved but this would require the removal of hedgerows and trees to improve the visibility splays. The road is, however, narrow and there is no footpath from the site to the village. It would also be unlikely that could be provided the full length to the village (as this would require third party land). Therefore there would be a highways objection to the development of this site.				
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery				

and school within 5 minutes walk

East Studdal is designated as a Village in Policy CP1 of the Core Strategy. There are a limited number of services, with the shop recently shutting. A bus stop is located within a five minute walk of the site, although there are no footpaths connecting the site to it.

Market Attractiveness SHLAA Score: 1.0 – Lower Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although a suitable access could be achieved onto the site, development is not well related to the existing village and the road leading to the site is narrow and does not have a footway. The construction of a footway would involve third party land. Consequently there would be a highways objection to the development of this site. Furthermore, development of the site would also adversely impact the wider landscape and the setting of the village.

Consider for inclusion in the Submission Document?

No

Site Code NS03SUT	Address Homestead Lane, East Studdal	Parish Sutton	Overall SHLAA Score The site is too small to be considered in the SHLAA	Area 0.13ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 3
Current Use SHLAA Score:				
Description of Site				
The site is heavily overgrown, with a strong tree lined boundary to the road. To the east lies existing residential development located within the settlement confines, to the south and west lies lower density residential development located outside of the settlement confines. A tennis court is located to the north of the site.				
Policy Alignment SHLAA Score:				
The site lies outside, but adjacent to, the settlement confines.				
Physical Constraints SHLAA Score:				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
The site is well contained and the only significant impact through development would be the necessity to remove the road frontage trees, which are not particularly significant, being coppice.				
Biodiversity				
This is a very small site, but may support foraging bats and common reptiles, for which surveys would be needed.				
EIA Screening; too small to be required		Appropriate Assessment: too small to be required.		
Green Infrastructure				
This small site is not connected to any recreational GI and could not provide significant biodiversity enhancements. It is GI neutral.				
Proximity to Road Network SHLAA Score:				
Homestead Lane is very narrow the footway would need to be extended along the site frontage to connect with the footway fronting no.1. Homestead Lane is within a 30mph speed limit and with the footway provision sight lines may be achievable. There are no traffic regulation orders on street. I am not aware of any buses operating within the vicinity of the site and local amenities are few.				
Access to Services SHLAA Score:				
East Studdal is designated as a Village in Policy CP1 of the Core Strategy. There are a limited number of services, with the shop recently shutting. A bus stop is located within a five minute walk of the site.				

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Whilst there are a limited number of services in East Studdal, the settlement is categorised as a village under Policy CP1 of the adopted Core Strategy, and is therefore considered suitable as a tertiary focus for development. An acceptable access can be achieved to the site, and there are no landscape or historical issues to prevent the site from coming forward. The recommendation is for the site to be considered as an amendment to the settlement confines (as it would be less than 5 dwellings), and the proposals map updated as such.

Consider for inclusion in the Submission Document?

Yes

Site Code NS04SUT	Address Land to the rear of former post office and Douglas Bungalows, Downs Road, East Studdal	Parish Sutton	Overall SHLAA Score = 26	Area 1Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 30
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Located south of Downs Road, the site falls gently to the west. The entire site, including its boundaries, are heavily wooded. To the north lie residential properties, with access suggested from the east of Douglas Bungalows. This access is already in place, having formerly served the Post Office, which has now been converted into residential use. To the south, west and east there are open fields, those immediately adjacent having been submitted for consideration under references SHL009 and SHL016 respectively.				
Policy Alignment Initial SHLAA Score: 6.0 – Partially outside development envelope with no designation The site lies outside, but adjacent to, the settlement confines.				
Physical Constraints Initial SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed The site is heavily wooded. Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations				
Landscape Impact East Studdal is primarily a ribbon development along Downs Road. Any intrusions into the countryside to the south are mainly by extensive gardens associated with road frontage houses. It is contained on the northern boundary by village development. The site appears to be a complex of fields. Development of this site would be highly visible from surrounding areas particularly from the north and east and introduce an anomalous and unwelcome intrusion into the open countryside. This would be against the grain of the development of the village and would have an adverse impact on its setting. Biodiversity The site is quite extensive, but long-term lack of management is seeing the change from grassland to woodland, with potential increase in biodiversity interest. Surveys would be needed to determine the level of interest that currently exists and this would need to include bat surveys.				
EIA Screening: required due to size		Appropriate Assessment: Contribution to the Thanet Coast SPA mitigation strategy would be necessary		
Green Infrastructure There are no PRoW in close proximity to the site. There are probably few opportunities for biodiversity enhancement, although incorporation of open SUDs could enhance wildlife interest. Overall, taking into account landscape impact, the site is GI neutral.				
Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct				

access to site

Downs Road is a 30mph road. The access road into the site as existing is likely to be substandard to support a development of 30 dwellings. A kerb build out on the right hand side when leaving the access road is likely to be required to improve visibility over the private parking area. There are no traffic regulation orders in the vicinity of the site. There are no obvious bus stops located within easy walking distance of the access. Whilst footways exist along part of Downs Road, they vary in width and are substandard for much of their length. Local amenities are limited and reliance on the private car is likely to be high in this location.

Access to Services Initial SHLAA Score: 2.5 – Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is approximately ten minutes walk away from the bus stop.

Market Attractiveness Initial SHLAA Score: 1.0 – Lower Value, High Cost

Ownership Initial SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although a suitable access could be established there is an overriding objection from a landscape perspective due to the detrimental impact of development on the grain and setting of the village and the wider landscape.

Consider for inclusion in the Submission Document?

No

Eythorne & Elvington

Site Code NS01EYT	Address Land off Kennel Hill, Eythorne	Parish Eythorne Hierarchy Village	Overall SHLAA Score 28 – 15+ years	Area Indicative No. of units @ 30 dph =
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The land rises to the east, with the land forming the bottom slope of the valley. This eastern boundary is heavily treed with a number of very high trees. The western boundary comprises a post and rail fence, and beyond this lies land submitted as LDF011. This is currently being grazed by alpacas. The land is bounded by Kennel Hill to the south. A small number of residential properties, located within the settlement confines, are located immediately adjacent to the north west boundary.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
<p>The site lies outside of the settlement confines. To the immediate south lies Waldershare Park, and Historic Park protected by Policy DM19.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment To the immediate south lies Waldershare Park, and Historic Park protected by Policy DM19. If the site were developed it may have an adverse impact on the setting of the park.</p> <p>Landscape Impact Any development of this site would have an unacceptable impact on the landscape given its prominent position. Development at this scale would overwhelm the existing settlement and would therefore be unsuitable. This is compounded by the topography of the site, which rises to the east, adding to the prominence which any new development would have on the landscape.</p> <p>Biodiversity There are a few scattered trees on the roadside boundary and a line of Poplar windbreaks on the eastern boundary ridge. The site has been orchard but is currently under arable which may support ground-nesting farmland birds, but biodiversity must be considered limited. Development could lead to limited biodiversity enhancement.</p>				
EIA Screening: necessary due to size		Appropriate Assessment: a site such as this in this location would need a wide-ranging assessment.		
<p>Green Infrastructure</p> <p>To the north boundary is bridleway EE352. The site has no other recreational GI attributes. Surface water drainage would be a major concern in development of this site, given its topography. There could be localised GI improvements associated with development but these would not be able to contribute greatly to any wider network and would have to be balanced against the detraction to the GI</p>				

attributes of Waldershare Park to the south.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site fronts Kennel Hill within a 60mph speed limit. The road alignment may make sight lines unachievable unless the speed limit can be relocated. The footway would need to be extended to front the site. There are no traffic regulation orders on street. The site is on a bus route. The connections back to village amenities are poor for pedestrians with no footway provision along The Street. The site is unsustainable in highway terms for a significant number of dwellings.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

Eythorne is designated as a Village in Policy CP1 of the Core Strategy. Although there are a number of services, including a Public House and a Community Primary School, only a bus stop is within a five minute walk of the site.

Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Any development of the site would have a detrimental landscape impact and would overwhelm the existing settlement. Although a suitable access can be achieved, the site is not sustainable in highway terms given the non-existence of pedestrian footways along The Street.

Consider for inclusion in the Submission Document?

No

Site Code LDF011 (EYT03)	Address Land to the east of Monkton Court Lane, Eythorne	Parish Eythorne <hr/> Hierarchy Village	Overall SHLAA Score 31 (11-15 Years)	Area 1.9 Ha <hr/> Indicative No. of units @ 30 dph = 57
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Overall a rectangular shaped site located on the south eastern edge of Eythorne currently used for the grazing of Alpacas. The site is located at the bottom of a valley with the farm land to the east and the residential properties to the west rising gently. There are properties to the north and south of the site. The properties to the west consist of bungalows. The western boundary along Monkton Court Lane consists of a hedgerow. There is no natural boundary to the east, only a post and rail fence. Beyond this the land rises.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site lies adjacent to the Eythorne Conservation Area, close to a Listed Building, both of which are to the south west of the site. If improvements to the Monkton Court Lane/Kennel Hill junction were required this could have a detrimental effect on the setting of the Conservation Area. Waldershare Historic park lies to the south.				
Landscape Impact The site is flat and is at the bottom of a west-facing slope. The site currently provides a soft edge to the village which is enhanced by a hedge. Development would require removal of that soft edge and replacement by footpath. Development on this site could have an adverse impact on the setting of the village, unless considerable care was taken with landscaping. It would be possible to create buffer to the farmland to the east, but potential impacts on historic assets would also need to be addressed, as well as the creation of a new frontage to Monkton Court Lane.				
Biodiversity There would be potential for woodland planting for landscaping and biodiversity. Currently the site is likely to have little biodiversity interest.				
EIA Screening: required due to the size of development.		Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy necessary.		
Green Infrastructure Urban biodiversity enhancements could be brought about with development. There is no PROW on the site, although the surrounds are well-endowed with relatively good byway and circular recreational route links. The Monkton Court Road frontage would require sensitive treatment to ameliorate loss of ambience to current residents.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

A pedestrian footway is required on Monkton Court Lane. An access can be created but development of over 50 properties would require an emergency access and a traffic assessment.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

Eythorne is designated as a Village in Policy CP1 of the Core Strategy. Although there are a number of services, including a Public House and a Community Primary School, only a bus stop is within a five minute walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

A safe access is achievable along Monkton Court Lane but this would involve the removal of the hedge. Development on this site could have an adverse impact on the setting of the village, unless considerable care was taken with landscaping. It would be possible to create buffer to the farmland to the east, but potential impacts on historic assets would also need to be addressed, as well as the creation of a new frontage to Monkton Court Lane.

Consider for inclusion in the Submission Document?

Yes

Sensitive landscape frontage treatment
Landscape buffer to east (open countryside)

Site Code SHL040	Address Land at Coldred Road, Eythorne	Parish Eythorne	Overall SHLAA Score 29.5 (+15 Years)	Area 0.45 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A rectangular paddock site located on the south western edge of Eythorne. Mature trees are scattered within the site. The site gently slopes down to the north west. The site is surrounded by scrub, trees and hedgerows. There are residential dwellings, located within the settlement confines, to the east and to the north of the site. A single large dwelling with related large garden lies to the south of the site, although this is located outside of the settlement confines. To the west there is a field.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the village confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed There is a gentle slope and there are mature trees on the site.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site lies within the Eythorne Conservation Area and contributes to the open/rural character of the area. There are also seven Listed Buildings within the immediate vicinity of the site. Three lie opposite the site on Coldred Road. Development of the site would urbanise the rural character and introduce related paraphernalia such as footpaths and street lighting. Development would, therefore, be detrimental. There is a possibility of archaeological remains on the site.				
Landscape Impact The site demonstrates a historical continuity in Eythorne, borne out by it being within the Conservation Area. Development would be highly detrimental to the village setting with the loss of open space and urbanisation of the edge of the village.				
Biodiversity There is expected to be a biodiversity interest here, particularly with regards to bats, given the nearby potential roost sites. This would need to be established as a priority as if the site constituted important foraging, it might fall within the ambit of the habitats regulations. There may also be other interest, such as common reptiles.				
EIA Screening: be need consideration due to being Conservation Area.		Appropriate Assessment: the proximity to Lydden and Temple Ewell Downs Sac needs consideration.		
Green Infrastructure To the north of the site is Flax Court Lane byway EE345 and just to the north of that footpath EE345A. Both these form important links in the network of footpaths that meet at the War Memorial. The area has a particular ambience that reflects its history. Development would damage this and lessen the recreational attraction of the area for walking.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site A suitable vehicular access can be gained from the southern section of the site, away from the roundabout. A footpath would be required if development was considered suitable (although this				

would impact on the Conservation Area). A bus stop is located near to the site.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

A bus stop is located within five minutes of the site and the local primary school is within ten minutes of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although access would be achievable, this site is in an important location within the Eythorne Conservation Area and is located close to seven Listed Buildings. Development of this site would have a detrimental impact on the Conservation Area and the setting of the Listed Buildings.

Consider for inclusion in the Submission Document?

No

Site Code SHL051	Address Land at Shooters Hill, Eythorne	Parish Eythorne Hierarchy Village	Overall SHLAA Score 30 (11-15 Years)	Area 1.14 Ha Indicative No. of units @ 30 dph = 34.2
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>A rectangular site consisting of private open space surrounded by belt of mature trees. A footpath cuts across the site from east to west in the southern part of the site. The land either side is fenced off. The resulting land fenced off to the south is heavily wooded/scrubbed. Land to the north, used as grazing land for horses, also has mature trees. There is a steep bank from Shooters Hill at the eastern corner (i.e. the site lies at a higher level than the road). Neighbouring sites consist of residential (to the east) grass land (to the north, submitted under reference LDF01) and a Church with related burial grounds (to the south and west).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>A public footpath and power lines cross the southern part of the site from the east corner to New Road to the west. Any development would have to consider these constraints.</p> <p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There could be possible archaeological remains on the site. Eythorne Baptist Church, which is adjacent to the site, is a Listed Building. The site consists of trees and scrub so development in this location would change the character from rural to urban and this would have a detrimental impact on the setting of this building.</p> <p>Landscape Impact</p> <p>The site is well contained but contributes to the green area that historically separates the two parts of the village.</p> <p>Biodiversity</p> <p>The site comprises two parts. To the north of the footpath is horse-grazed pasture which is developing the physical characteristics of wood pasture. However, this is of relatively recent origin. The site is likely to be important for bat foraging and could support common reptiles. The grassland itself appears relatively poor in species. To the south of the footpath is area of secondary woodland and scrub. A record in 1990 indicated that some of this had chalk grassland attributes, but those appear to have been lost to scrub in the intervening years.</p>				
EIA Screening: required on account of size		Appropriate Assessment: A contribution to the Thanet Coast SPA mitigation strategy would be required.		
<p>Green Infrastructure</p> <p>The site is transacted by footpath EE348 that connects new road to Shooter's Hill which is an important link in the strategic set of paths to the east and west of Eythorne. It contributes in being a public link through a green space between Upper and Lower Eythorne. It would benefit from management of the south side to recover chalk grassland, if possible. If put forward for development,</p>				

there would have to consideration of surface management due to the topography of the site.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

A suitable access is not possible from Shooters Hill due to changes in land levels and the resulting steep bank. To achieve a suitable access would require third party land. The site is therefore landlocked.

Access to Services SHLAA Score: .0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is 5 minutes walk away from the local primary school and a bus stop. This is reflected in the SHLAA scoring.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site is not suitable for development as a vehicular access can not be achieved without the use of third party land. Furthermore, any development would have a detrimental impact on the setting of the adjacent Listed Building, and should therefore be resisted.

Consider for inclusion in the Submission Document?

No

Site Code LDF01 (EYT02)	Address Land behind Homeside, New Road and 72-80 Sandwich Road, Eythorne	Parish Eythorne	Overall SHLAA Score 29.5 (+15 Years)	Area 0.82 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular site located on the northern edge of the southern part of Eythorne. The site is used for grazing horses and is completely surrounded by hedgerow. The site falls gently to the west and is bounded by residential properties to the north and east and the East Kent Light Railway to the west. To the south lies land submitted under reference SHL051.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines, which follow two and a half sides of the site boundary.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site is located behind properties fronting Sandwich Road to the east. The housing estate built to the north was built within the last ten years and appears to be ‘backland’ development, similar to this site. Development would continue the infill of this area.				
Landscape Impact The site is hidden from Sandwich Road but it can be seen from the properties in Sun Valley Way which immediately abut the site. Bands of vegetation screen the site from the properties to the west. The Inspector at the previous Local Plan Inquiry commented that ‘the openness of the site together with the land either side of it are important characteristics which together form a notable landscape setting for this part of the village in medium distance views from the north west’ and that any ‘...development would have an adverse impact on the acknowledged quality of the landscape’.				
Biodiversity There are mature trees around the site boundary which may be suitable for foraging bats and the grassland will support common reptiles. The site will have some wider biodiversity connectivity by virtue of the adjacent EKLR line.				
EIA Screening: required due to size of site		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy required.		
Green Infrastructure The site is relatively isolated in GI terms, with the only external link being the EKLR line. The nearest PROW is EE348 which connects Shooter’s Hill to New Road and is an important link in the strategic set of paths to the east and west of Eythorne. This GI connection could be developed if the site SHL051 were also to come forward. The site configuration would allow for some GI incorporation. The presence of the trees to the west should be taken into account, to avoid untoward pressure for their removal.				
Proximity to Road Network SHLAA Score: 3.0 – Backland, land take required in an urban area including potential ransom strips				

The site has an existing access off Sun Valley Way, however it is in multiple ownership and appears to be in use as garden land associated with No. 37.

In order to develop the site this land would be required to create a suitable access for the level of development which could be accommodated on the whole of the site and to be of an adoptable highway standard. Sun Valley Way is a publically maintainable road and already serves in excess of 20 dwellings. It has been designed to a minor access road standard and as a cul-de-sac should not serve in excess of 50 dwellings unless an alternative emergency access (also serving as a pedestrian/cycle route) can be provided. There are no other suitable access points to this site.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Although the site is located close to the bus route and local primary school, there are no direct links to them from this site (the railway line being the obstruction) and the route that would need to be taken would take around ten minutes.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The only acceptable access to this site is via Sun Valley Way but this would require additional land which is in more than one ownership. This could lead to time delay or increased costs associated with developing the site. The site is visually enclosed from Sandwich Road but development of the site would have a detrimental impact on the wider landscape. For these reasons the site is not considered suitable for development.

Consider for inclusion in the Submission Document?

No

Site Code EYT05	Address Land between properties on Wigmore Lane and Railway Line, Eythorne	Parish Eythorne	Overall SHLAA Score 33 (6-10 Years)	Area 2.09 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site consists of open grassland which is currently being used for horse grazing. The site is bounded by two relic railway lines; one serving Tilmanstone Colliery, the other the East Kent Light Railway (EKLR) which is being developed for tourism. Associated with these railways are wooded embankments, whilst along the roadside there is a mature hedge. There are residential properties to the north, to the south east (on the other side of the railway) and to the west. To the north east there are open fields.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The south eastern boundary is adjacent to the settlement confine.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>Owing to the fact that the site is bounded by the EKLR line there may be issues of noise and disturbance associated with the use, although this is only a tourist line. Development on this site would have and adverse impact on the vegetated separation between the two parts of the village - which reflect the past industrial heritage.</p> <p>Landscape Impact</p> <p>The site is flat and is visible when viewed from the north. There are filtered views through properties to the west. Development of this site would result in the loss of the separation between the two parts of the village which would have a detrimental impact on the setting of the village and the wider landscape.</p> <p>Biodiversity</p> <p>There are numerous trees along the boundaries of the site which could provide important flight lines and foraging for bats. The current use of the fields could be of some benefit to biodiversity. Further investigation into grassland quality would be necessary but would not stop development.</p>				
EIA Screening: necessary due to size			Appropriate Assessment: contribution to Thanet Coast SPA mitigation necessary	
<p>Green Infrastructure</p> <p>There no PROW on the site and although footpath ER338 is opposite the site, it leads towards the derelict colliery shale heaps, which would have limited recreational interest. There would be little opportunity to further develop recreational GI due to the presence of the active EKLR project to the SE and housing and roadside to the NW. The site is of an awkward configuration limiting potential internal GI provision.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>There is an existing access point to the field where the site meets Wigmore Lane but the sightlines here are poor and could not be improved sufficiently to achieve an acceptable vehicular access to the site. There are no other obvious access points to this site as it is constrained by the existing built development and the EKLR.</p>				

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is within five minutes walk from the local primary school and bus stop.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

There is an existing access to this site but the sightlines here are poor and could not be improved sufficiently to achieve an acceptable vehicular access to the site. Development on this site would have an adverse impact on the setting of the village as the vegetated separation between the two parts of the village would be lost. Additionally, any development would have an adverse impact on the wider landscape.

Consider for inclusion in the Submission Document?

No

Site Code SHL020 (EYT11)	Address Land to the north of Elmton Lane, Eythorne	Parish Eythorne	Overall SHLAA Score 28 (+15 Years)	Area 2.57 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site An irregular shaped site located on the north eastern edge of Eythorne. The site consists of managed open grassland land with sporadic trees, which has the appearance of a meadow/paddock. The site has a slight undulation. There is a heavy belt of trees running up the western boundary. Tilmanstone business park lies to the north and this overlooks the site (it is located on top of a former spoil tip). There is one access road (Elmton Lane) which serves six terraced dwellings to the south of the site. These dwellings are located outside of the settlement confines.				
Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park The site is outside, and some distance from, the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment There may be issues relating to the contamination of the land which would need to be investigated. The site is also in very close proximity to a number of industrial units (some of which operate 24 hrs a day) and there may be issues of noise associated with these uses.				
Landscape Impact The land falls very slightly away to the west but is contained to the north by the ex-colliery landform. The western boundary consists of the relic colliery railway. The site location indicates that it may have been associated with the colliery but never used, or simply for sporadic dumping, subsequently acquiring a tree cover. It has undergone considerable clearance in recent years but still has wooded boundaries. It is generally discrete in landscape terms.				
Biodiversity The site is surrounded by mature trees, which could include important flight lines and foraging for bats. The recent reduction in tree cover may well have encouraged colonisation by reptiles from the colliery shales nearby. A biodiversity assessment would be required.				
EIA Screening: necessary due to size		Appropriate Assessment: contribution to Thanet Coast SPA mitigation required.		
Green Infrastructure Footpath EE338 (associated with the old colliery) goes along the E and N boundaries to link Burgess Hill to Elmton Lane. The site is likely to benefit biodiversity. It retains a historical linkage with the colliery lying between two arms of the ECLR and finishing at the tree-covered shale embankment which delimited the colliery boundary. Development would be GI neutral as long as the boundary features were retained.				
Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility The access from Elmton Lane onto Wigmore Lane has poor alignment to the north and unsuitable sight lines to accommodate any additional development. Considerable highway improvements would be required to the Wigmore Lane access which would involve third party land. There are no				

pedestrian linkages to Eythorne.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The SHLAA scoring states that site is within five minutes walking distance from the local primary school and a bus stop. However, unless walking as the crow flies, it would be more realistic to state that the site is within a ten minute walk of the Primary School. The site is also adjacent to the Tilmanstone Business Park, just north of Eythorne and is approximately 0.5 km away from the centre of the village.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Whilst the site is discrete within the landscape and it is located close to employment, and public transport, the site does not have a suitable highway access for additional development due to poor sight lines caused by the road alignment to the north. The site is also not well related to Eythorne, where the main facilities are located, in terms of pedestrian connectivity.

Consider for inclusion in the Submission Document?

No

Site Code SHL036	Address Shepherdswell Road, Eythorne	Parish Eythorne	Overall SHLAA Score 36	Area 0.34 Ha
		Hierarchy Village		
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>Rectangular shaped site located in the edge of the northern part of Eythorne. The site consists of a managed grass and shrubs that has the appearance of a rear garden with self sown trees along boundary edge. Considerable change in land levels results in a high bank down to Shepherdswell Road on the south eastern boundary line. There are residential properties on the opposite side of this road. There are also residential properties and their related gardens to the north west and north east of the site. To the south west there is a small area of woodland.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The settlement confines are adjacent to the site on three boundary lines, to the south east (following the building line on the opposite side of the road), to the north east and to north west</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>The SHLAA scoring reflects the considerable change in levels along the south eastern boundary where the site meets the road. This area has also become wooded.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The Church to the north of the site and the Old Bakery to the north east are Listed. Development of this site would introduce urban form that would have a detrimental impact on the settings of the Church and Listed Buildings.</p>				
<p>Landscape Impact</p> <p>The entrance to the village in this location is relatively soft, reflecting a not unusual transition from farmstead and smaller fields to housing, although new development to the south of the road has yet to 'bed in'. This is complemented by the wooded embankment to the north of the road, which extends beyond the bounds of this site. To develop the site would require extensive tree loss and engineering works that would appear incongruous in such a setting and be visually detrimental to the village edge. The trees along Shepherdswell Road are protected.</p>				
<p>Biodiversity</p> <p>The habitat could be suitable for bats so a biodiversity survey would be required as part of any application.</p>				
EIA Screening: too small to be necessary.		Appropriate Assessment: too small to be necessary.		
<p>Green Infrastructure</p> <p>There are no public recreational attributes to the site and development could not provide any. The biodiversity interest that the site may hold would be lost with development.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Uncertain land ownership surrounding site leaves only option for an access on Shepherdswell Road. This would not be possible due to change in levels and spacing with existing junction. In order to achieve a satisfactory access this would require the removal of the bank and protected trees. Furthermore, there would be concerns from a highway safety perspective if visitors to a development</p>				

were to use Shepherdswell Road for on-street parking.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

Eythorne Elvington Community Primary School is within ten minutes walk away. A bus stop is within five minutes walk away. The Doctors surgery is on the opposite side of the village.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site is not considered to be suitable for development because it appears to be landlocked with no suitable access and development would have a detrimental impact on the setting of the village and neighbouring Listed Buildings. To develop the site would require extensive tree loss and engineering works that would appear incongruous in such a setting and be visually detrimental to the village edge. In addition, the trees along Shepherdswell Road are protected.

Consider for inclusion in the Submission Document?

No

Site Code EYT06	Address Land to the rear of St. Peter's and St. Paul's Church, Church Hill, Eythorne.	Parish Eythorne	Overall SHLAA Score 33 (6-10 Years)	Area 0.56 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped site located on the edge of the northern part of Eythorne. The site consists of formal grass, which has the appearance of a paddock, and a port-a-cabin. The site has mature hedgerows on all boundaries. There are gardens to the south, the church to the east and fields to the west. A large dwelling, The Rectory, lies to the north.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The adjacent Church is a listed building. The open space to the north west of the Church is important to its setting. Developing this site would inevitably detract from the setting of this listed building.				
Landscape Impact The site slopes to the southeast and is contained by hedgerow to the west beyond which is open countryside. Mature trees are to be found to the east and south. Any development would have to ensure that it retained a soft edge to the village.				
Biodiversity There is likely to be a significant bat interest associated with the Church and Old Rectory. The mature trees and hedgerow would be important not only for foraging but also as flight lines. The grassland could be important for foraging.				
EIA Screening: required due to size			Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy required.	
Green Infrastructure The current use of the site is unknown. There are no PROW crossing the site and there is no potential for connection to other paths. Biodiversity interest are limited and overall, the site is GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Access onto Barfrestone Road would be possible, but only for up to five properties as the existing access could not be constructed to an adopted standard and would therefore limit the amount of development. Any larger development would also put pressure on the Barfrestone Road/Church Hill due to the existing junction spacing which would be unsuitable for increased vehicular movements.				
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk				

The site is within five minutes walk from the local primary school and bus stop.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Despite there being no objections from a landscape and highways perspective for a limited amount of development (5), there would be an overriding objection due to the adverse impact that development would have on the setting of the listed building. It is therefore considered that the principle of development is not acceptable on this sensitive site.

Consider for inclusion in the Submission Document?

No

Site Code SHL031	Address DDC owned site - Land to east of Adelaide Road, Eythorne	Parish Elvington	Overall SHLAA Score 39.5 (0-5 Years)	Area 0.23 Ha
		Hierarchy Village		
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
Description of Site A rectangular site consisting of a mixture of trees and open space to the north of the site and metal corrugated garages on hard standing to the south of the site. The northern boundary is delineated by a footpath, which separates the site from further wooded/ scrub area. The eastern boundary is open and abuts playing fields. To the south lies residential development located within the confines.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation The site is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment Development in this part of Eythorne is ribbon along Adelaide Road. Development of this site would continue this trend. The site is, however, small and would not connect Eythorne with Elvington.				
Landscape Impact Approximately 25% of the site is mixed planted woodland part of which dates back to Victorian times and reflects a historical landscape feature and the trees to the north west of the site, bounding the road, should be retained. If the trees were removed and the site developed, it would create a hard urban edge to this part of Eythorne. Development which retained the trees would need to consider any pressures to remove such from later landowners.				
Biodiversity There will be some biodiversity interest associated due to the age of the trees. A bat survey would be required as the tree belts could be important for foraging and roosting. The remaining vegetation comprises later trees and scrub with grassland which could support common reptiles. Any developer would have to undertake a Biodiversity survey.				
EIA Screening; too small to need consideration		Appropriate Assessment: too small to need consideration.		
Green Infrastructure The site abuts Tilmanstone Colliery Welfare Sports ground which is also lightly used for general recreation. Although it would be possible to access the sports ground this is not the main access. The sports ground has a minor amenity GI function which is insignificant in the context of that elsewhere in the locality.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site The access is achievable but the sight lines would need to be retained. Suitable visibility can be achieved from an access on the site frontage, subject to cutting back of vegetation as necessary.				
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk The site is within 5 minutes walk of the local primary school and bus stop. The site is also 10 to 15 minutes walk away from the Doctors surgery in Elvington.				

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Taking into account the woodland cover on site, there is some potential for limited development (below five units). Although there would be loss of open space, development of the site would improve the visual impact of the site. Important trees must, however, be retained and Biodiversity survey must be undertaken by the developer before development could commence. Given the capacity of the site is for under 5 units the suggestion is for the settlement confines to be amended to include this site.

Consider for inclusion in the Submission Document?

Yes

Retention of trees

Site Code SHL088	Address Land to east of Adelaide Road, Elvington	Parish Eythorne	Overall SHLAA Score 30 (11-15 Years)	Area 7.74 Ha
		Hierarchy Village		
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>The site comprises open fields, and there is a woodland belt around most of the site boundary. The site falls gently from the north western boundary. There is also a steep drop from Terrace Road to the fields along the north western boundary. There are fields to the north east and south west of the site. To the south east there is a mixture of fields, formal opens space (bowling club) and woodland. There are residential properties along the north western boundary.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The north western boundary is adjacent to the confines.				
Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues				
Large electricity pylons cross the site from the north east down to the south west.				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There is a possibility of archaeological remains given the size of the site. There is a Listed Building within woodland to the south east of the site. Development of this scale would have a detrimental impact on the setting of this building.</p>				
<p>Landscape Impact</p> <p>Elvington is a village with highly defined boundaries. Terrace Road, a linear street is adjacent to an engineered embankment that predates the coming of the colliery and appears associated with the tree belt along Adelaide Road and small copse near the northwest end of Terrace Road, the woodland dating from Victorian times. These are important landscape features. Development on this site would damage the landscape features mentioned above and encroach into an area that is highly sensitive in separating Elvington and Eythorne, to the detriment of both and would result in the effective coalescence of the two settlements.</p> <p>Biodiversity</p> <p>The woodland on Adelaide Road and the relic woodland triangle near Burgess Hill both date from Victorian times and may be important for wildlife, especially bats, on that account. The embankment is predominantly scrub which would provide nesting for birds and refugia for common reptiles.</p>				
EIA Screening: necessary on account of size		Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy required. Consideration of the Lydden and Temple Ewell SAC also necessary.		
<p>Green Infrastructure</p> <p>The site is arable farmland. It has two informal paths crossing between the sports ground and Terrace Road and also has a footpath extending along its northern boundary, linking Adelaide Road and Miners Way Footpath. High Voltage Pylons cross the southern part of the site. The site currently will have biodiversity interest limited to its periphery. Any development would have to have considerable</p>				

GI input both to maintain the civic amenity links between the sports ground and Elvington and to provide functioning biodiversity areas.

Proximity to Road Network SHLAA Score: 3.0 – Backland, land take required in an urban area including potential ransom strips

An access could be achievable but this would require earth movements to overcome the initial steep gradient on Sweetbriar Lane. Suitable visibility can be achieved from an access on the site frontage.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

A bus top, the GP surgery and the Elvington Eythorne Community Primary School are within five minutes walk from the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site considered to be unsuitable for development because of the detrimental impact on the wider landscape and would result in the coalescence of the two settlements, which must be strongly resisted. Furthermore, development at this scale would be inappropriate for this village location.

Consider for inclusion in the Submission Document?

No

Site Code SHL089	Address Land to west of Adelaide Road, Elvington	Parish Eythorne	Overall SHLAA Score 30 (11-15 Years)	Area 10.1 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A large irregular shaped site consisting of open farm land lying on land that falls predominantly on a ridge but then falls gently eastwards. The site is surrounded by farmland with the exception of the north east and south east corners which abut residential areas. The boundaries to the southwest and east follow Barfrestone Road (a rural road) and Adelaide Road respectively. The site boundary is generally free of vegetation with only a limited amount of hedgerows.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site is adjacent to the settlement confines of Elvington at its northern most tip and Eythorne at its south eastern tip.				
Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues				
Electricity pylons cross the far south eastern part of the site.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment Possible archaeological remains due to the size of the site. Investigation would have to be undertaken before any development could take place.				
Development of the whole site would result in the coalescence of the two settlements. This would be detrimental to the setting of Eythorne and Elvington				
Landscape Impact The site is in very prominent position in the open countryside, which is considered as moderate to high sensitivity. Development would, therefore, have a detrimental impact on the wider landscape.				
Biodiversity There are no significant biodiversity issues on the site				
EIA Screening: necessary due to size			Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy required. Consideration of the Lydden and Temple Ewell SAC also necessary.	
Green Infrastructure The NW boundary of the site abuts the byway EE335 'Roman Way' an important local ridgeway route which may have historical significance. Any development would have to include considerable GI.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				
There two access possibilities along Barfrestone Road, one at the far western corner (where there is a public footpath) and one slightly further east where the road bends slightly. This road may, however, need to be widened as this road is, on the whole, a single track road. There are, however, no walking or cycling connections along Barfrestone Road. A Transport Assessment would need to be				

undertaken as part of any planning permission.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

A bus stop, the GP surgery and the Elvington Eythorne Community Primary School are within five minutes walk from the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

The site does not have potential due to the detrimental impact development would have on the wider landscape and would result in the coalescence of the two settlements, which must be strongly resisted. Furthermore, development at this scale would be inappropriate for this village location.

Consider for inclusion in the Submission Document?

No

Site Code EYT09	Address Play Area to the west of Adelaide Road, Elvington.	Parish Eythorne	Overall SHLAA Score 35.5 (6-10 Years)	Area 0.23 Ha
		Hierarchy Village		
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Rectangular shaped, flat, site located on the eastern side of Elvington, last used as a play area, although this equipment has now been removed. The site is contained within a high hedgerow to the west and north and residential properties to the east. The site is open to the fields to the south. Apart from the residential properties to the east, the site is surrounded by open fields.</p> <p>The play equipment has been removed leaving remnants of hard standing. This equipment has now been reinstated at a more central location in Elvington.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The site is located behind existing properties. Development would, therefore, be against the grain of built form of the existing settlement.</p> <p>Landscape Impact</p> <p>The site is flat and bounded by hedges. It is anomalous in landscape terms, jutting out to the south west of the village and it is questionable whether future development should seek to maintain this anomaly. Any redevelopment of this site for housing would have an irreversible impact on the wider landscape. The pressure to remove, or reduce the hedgerow would be high, reducing any screening and exposing the site to the wider landscape.</p> <p>Biodiversity</p> <p>There may be a minor (due to its isolation) biodiversity interest in the hedgerow and grassland. Common reptiles may be present.</p>				
EIA Screening: too small		Appropriate Assessment: too small to need consideration.		
<p>Green Infrastructure</p> <p>Footpath PROW ER336 crosses the field to the south, touching the southeast boundary of the site and there is access to this path from the site. To the north and separated from the site by a section of field Byway ER335 crosses east-west. The site is a current GI use, which would be lost if the site were redeveloped.</p>				
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>There is an existing vehicular access off Adelaide Road, which may be capable of serving a limited amount of development. This existing access road is, however, opposite Chaucer Road and this could conflict with highway movements associated with this junction.</p>				

A highway junction, laid out to an adoptable standard, and forming a crossroads with Chaucer Road would not meet KCC Highway standards.

The access arrangement would therefore need to remain very much in its current form, i.e. continuous footway with a dropped kerb to serve a private drive. I would support no more than five dwellings. The width of the access road would need to be at least 5 metres for the first 6 metres from the edge of carriageway and could then narrow down to 4.1 metres for the remaining length or even 3.2 metres with intervisible passing places.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is five minutes walk away from the GP surgery and bus stop. This is reflected in the SHLAA score. The local primary school is approximately ten minutes walk away.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Although a suitable access may be achievable, any housing development on this site would have a detrimental impact on the landscape. The play area, which is equipped with relatively new equipment, is an important local facility and it has not been identified for closure. Development of this site should therefore be resisted.

Consider for inclusion in the Submission Document?

No

Site Code SHL063 (part EYT08)	Address DDC Owned Site, Sweetbriar Lane, Elvington	Parish Elvington	Overall SHLAA Score 28.5 (+15 Years)	Area 1.85Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>A triangular shaped site located on the eastern side of Elvington which includes EYT08, a small site within SHL063 (amounting to 0.14ha). The site falls gently to the east where the land rises again (and is the former spoil tip). The site consists of a mixture of open unmanaged grassland with scrub and trees (the majority of the site), managed grassland (the south western tip which is also the area covered by EYT08) and allotments (to the west).</p> <p>The allotments cover approximately 1 acre (with 13 plots); they are non-statutory and unmanaged. As of August 2012 these are now vacant, although a garage remains in use.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The western side of the site is adjacent to the village confines.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p> <p>Power lines cross the site at the far south eastern point.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The boundary of the site abuts the Miners Way to Tilmanstone. Development in this location would need to ensure that this historic link is maintained.</p>				
<p>Landscape Impact</p> <p>The site falls to the east. The smaller site (EYT08) would be the most visible as it is the highest point in the site and development of this site would close the gap between the existing development to the west and east. This area forms part of the gateway between the old colliery and Elvington. Closure of this gap would erode the historic character of the settlement.</p> <p>The remaining part of the larger site is within a dip and is less prominent and development in this location would have less of an impact. Development may be possible if the area to the east adjoining the road is kept open.</p>				
<p>Biodiversity</p> <p>The site is currently rough grassland with scrub, which will have a moderate biodiversity potential, particularly for common reptiles. This potential would include bats. Although listed in the 2003 habitat survey as neutral grassland (but not BAP lowland hay meadow) there are indications of a calcareous element to the grassland – this may be related to mining history. Any planning application would require a full biodiversity assessment.</p>				
EIA Screening: required due to size of site		Appropriate Assessment: contribution to Thanet Coast SPA mitigation strategy required.		
<p>Green Infrastructure</p> <p>Development would result in the loss of allotments and thus be contrary to Policy CP7. Part of the</p>				

area near the allotments was a sewage works and there may be contamination issues.

PROW EE337 – Burgess Hill – forms the southern boundary to the site. The rest of the site is well-used for recreational purposes, but also suffers from adverse impacts of urbanisation (fly-tipping, dog-fouling etc.). It is currently rough grassland with scrub. The site has good biodiversity connections to the wider countryside and these should be maintained. As the site falls away to the shale tips of the old colliery, any development would have to consider surface water drainage.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There is currently no vehicle access onto the site and the frontage with Sweetbriar Lane is very constrained. The road is narrow and due to the curvature of the road any proposed access would not be able to achieve the necessary sight lines and forward visibility. The junction would also be too close to the existing junction with Milner Road.

The landowner has confirmed that an access, measuring 8.52 metres wide, could be taken from alongside 7 Beech Drive. If access were to be provided from this point it would entail alterations to the current traffic priority at the Beech Drive/Cherry Grove junction and the internal site access would need to form a loop to provide suitable emergency vehicle access.

An emergency access could be provided off Sweetbriar Lane, restricted to emergency use only.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

Bus stop and GP surgery are within five minutes walk away. The Elvington Eythorne primary school would be within ten minutes walk away.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Development of the larger area would not have a detrimental impact on the wider landscape. It is possible to achieve a satisfactory access, although there would need to alterations to the traffic priority at the junction with Cherry Grove.

Consider for inclusion in the Submission Document?

Yes

Site Code SHL042	Address Land at Canterbury Road, Lydden.	Parish Lydden	Overall SHLAA Score 32.50 (6-10 Years)	Area 1.45 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation.				
<p>Description of Site</p> <p>The site is located to the west of Lydden Primary School and on the edge of the village. It is located within the settlement confines. The site comprises rough grassland, which sits higher than the fields to the north, but is well screened by trees which are protected. There is also substantial planting to other boundaries.</p> <p>The site has the benefit of an existing access road, laid out to serve the recently constructed GPs surgery, which is located to the west of the entrance. The initial outline planning consent also included planning permission for 24 residential units, although this element has now lapsed and a new planning application would be required. In addition, the site includes an additional area of land, extending east of the land covered by the original outline permission.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is located within the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows, to be addressed				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Landscape Impact</p> <p>The site is the eastern part of a large field on the edge of Lydden. The western part has the benefit of planning permission. This site sits higher than fields to the north, but is well screened by trees. There is also substantial planting to other boundaries, although gaps occur to the rear of houses on Canterbury Road. Development here would extend the change in character already accepted for the western part and the visual impact would be limited. There are no overriding landscape reasons for rejecting this site.</p> <p>Biodiversity</p> <p>The site is rough grassland with trees to the boundaries, those to the north being subject to TPO. Earlier biodiversity surveys indicated that there was wildlife interest on the site and this would require re-evaluation. Common reptiles are highly likely to be present and the field could comprise bat habitat. Other protected species may be present. If the biodiversity value of the site is high enough, this could represent a valuable reservoir.</p>				
EIA Screening: necessary due to number		Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be necessary.		
<p>Green Infrastructure</p> <p>The site is isolated in respect of PRoW and any connectivity to the north should be discouraged due to the proximity of the Lydden and Temple Ewell Downs SAC. The site contains an undevelopable woodland bank that should be maintained and enhanced for screening purposes. As such it would then</p>				

provide some opportunity for biodiversity enhancement. There would be an opportunity of combining the woodland bank and the necessary protected root zone for a recreational area. SUDs should be incorporated also, but this should not impose on the protected root zone.

Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility

The site is accessed via Canterbury Road which has a 30mph speed limit at this section. The site is not shown to connect to the public highway; however an access road is shown on the extant planning permission (DOV/09/922). Fifteen properties would need to be served via an adopted road with access from Canterbury Road. Sight Lines look to be achievable. The road should be adopted under a Section 38 Road Agreement.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

Lydden Primary School is located within a five minute walk of the site. A bus stop is located immediately opposite the public house buildings. Lydden also has a village hall and recreation ground. In addition, the recently constructed GP's surgery, located at the entrance to the site and fronting Canterbury Road, opened in Autumn 2011.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is within the settlement confines and the adjacent site has an extant consent for 24 units. There are no overriding landscape constraints, however a biodiversity survey would be required as part of any development proposal. The site is located immediately adjacent to the Primary School and therefore could encourage walking and cycling.

Recommend for inclusion in the Submission Document?

Yes

Retain woodland bank

Ringwould with Kingsdown

Site Code LDF017 (KIN05/ KIN01M)	Address Land between the Village Hall and The Bothy, Upper Street, Kingsdown.	Parish Ringwoud with Kingsdown Hierarchy Village	Overall SHLAA Score 39.5 (0-5 Years)	Area 0.26Ha Indicative No. of units @ 30 dph = 7
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>Square site formally used as a private car park, which is now overgrown with weeds and self sown sycamore trees. There are two levels to the site, the smaller southern section is raised and consists of gravel and grass. The larger section to the north was a former car park.</p> <p>There are mature trees along the boundary line with the neighbouring holiday village to the south. To the west of the site there is the Parish Hall, which is also raised, so there is a retaining wall in the car park section along this boundary line. To the east there are residential properties and the access road to the holiday village. To the north there is a brick wall, beyond which is Upper Street and more residential properties.</p> <p>LDF17 (and KIN01M) relates to the former car park and access road. KIN05 also includes the raised land behind.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>The site is adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>The SHLAA scoring reflects the change in levels in the site.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The majority of the site lies within the Kingsdown Conservation Area. A small part of the site (to the south) is outside the Conservation Area. The Old Cottage opposite the site on Upper Street, is a Listed Building. The site includes KIN01M which was dismissed on appeal as the scheme failed ‘...to meet the high standards of design appropriate to the Conservation Area and required by National planning guidance’. From a conservation perspective this additional land, along the western and southern boundaries (not included in LDF017), could be used for gardens and landscaping in association with LDF017. Any development within the site should take into account the importance of retaining the protected trees.</p>				
<p>Landscape Impact</p> <p>The larger part of the site (as with KIN01M) is behind a large wall and in a depression, so there would little impact on the landscape. The southern part of the site is raised and is quite visible from Upper Street. As with the Historic Environments comments, the more exposed part of the site could be restricted to use for gardens, which would lessen the risk of damage to the protected trees. However, it would be important to ensure that unsightly garden paraphernalia does not make this raised part an eyesore.</p>				
<p>Biodiversity</p> <p>The mature trees to the south are protected (with a blanket TPO covering the entire site – LDF017) and may act as a flight guide and foraging area for bats. The trees would probably have to be pruned as part of any development. Elsewhere reptiles may use the site so survey would have to be undertaken by the</p>				

developer as part of any planning application.

The site is within 200m of the Dover to Kingsdown Cliffs SSSI and 300m of the Kingsdown and Walmer Beach LWS. However, in both cases, it is considered that the number of dwellings would not result in adverse impacts on these sites.

EIA Screening too small to consider

Appropriate Assessment: too small to consider.

Green Infrastructure

The site is urban, but within easy reach of the beach and National Cycle Route 1. The site itself cannot contribute to GI significantly.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site has no existing access other than across adjacent land (which is identified as within land ownership). A transport statement would be required to show existing versus proposed use. Visibility is likely to be a problem but the access may serve some type of development. There are no pedestrian footways along Upper Street and therefore pedestrian safeguarding is considered to be poor.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is within five minutes walk of the bus stop and ten minutes from the local primary school. This is reflected in the SHLAA score.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Further investigation is required in connection with the transport movements associated with the site's previous use. Notwithstanding this, it is envisaged that achieving suitable sight lines would be problematic. There is concern that development on the higher levels within the site would have a detrimental impact on the Conservation Area and the overall landscape. Development in this location should be limited and preferably used for gardens and landscaping, under planning restrictions, in association with KIN01M.

Consider for inclusion in the Submission Document?

Yes

Include land at rear within site boundary?

Site Code SHL056	Address Amendment to Village Confines, Bayview Road, Kingsdown	Parish Ringwold with Kingsdown Hierarchy Village	Overall SHLAA Score 27.5 (Undeliverable)	Area 1.22Ha Indicative No. of units @ 30 dph = 36
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>This site has been submitted for an amendment to the settlement confines that would result in the exclusion of an area of land covering the rear gardens of the properties fronting Queensdown Road. The new line of the confine would be arbitrary as it does not follow any physical line on the ground. To the north of the site lies existing residential development and to the south open countryside, located within the AONB.</p>				
<p>Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation</p> <p>As stated above the site is within the settlement confines, however this request is to remove the land from the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>This SHLAA score reflects the numerous hedging and fencing between plots.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The boundary line currently reflects the line of where the rear gardens meet Bayview Road and where the AONB where it meets Kingsdown.</p>				
<p>Landscape Impact</p> <p>The AONB boundary is Bayview Road and currently the rear gardens of the properties on Queensdown Road provide the setting for this boundary. Changing the settlement confines would ensure protection of the setting of the AONB, but is difficult to define.</p>				
<p>Biodiversity</p> <p>The possible loss of biodiversity related to the rear gardens would be reduced by change in confine boundary.</p>				
EIA Screening: not applicable		Appropriate Assessment: not applicable		
<p>Green Infrastructure</p> <p>Change of confine would ensure the ambience of the AONB in this area, particularly those using PRoW Bridleway ER24, which is a N-S meeting Bayview Road at its junction with Victoria Road is maintained.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>This is not relevant, given that the request is for the exclusion of the land from the settlement confines.</p>				
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The site is within ten minutes walk to the nearest bus stop and local primary school.</p>				
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>				
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>				

Analysis

The area identified is located within ten minutes of a bus stop and school and is within a settlement designated as a village in the Core Strategy, suitable for some development. The definition of 'Previously Developed Land' now excludes garden development. There are, therefore, planning measures in place to ensure that inappropriate development would not take place. It is not considered appropriate to amend this settlement confine in this instance.

Consider for inclusion in the Submission Document?**No**

Site Code KIN04	Address Land to the south of Northcote Road, Kingsdown	Parish Ringwoud with Kingsdown Hierarchy Village	Overall SHLAA Score 25.5 (Undeliverable)	Area 1.19 Ha Indicative No. of units @ 30 dph = 36
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site Rectangular shaped site, consisting of scrub, located at the southern end of Kingsdown. The site falls from the northwest and drops steeply to the centre of the site before rising again to meet Old Stairs Road in the southeast. There is a concentration of mature trees on the south eastern boundary. The remaining three boundaries have a mixture of hedgerow and trees.</p> <p>The surrounding uses consist of residential to the north, East Bottom Farm to the southwest and woodland and scrub to the northeast and southeast.</p>				
<p>Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints</p>				
<p>The north western boundary is adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment No considerations</p>				
<p>Landscape Impact The site is adjacent to AONB, which lies to the south and west. The site provides a vital role in softening the transition from urban form to open countryside. Any development in this location would have a detrimental impact on the setting of the AONB and on the setting of the village.</p>				
<p>Biodiversity The site boundary is wooded with notable mature trees to the south. The site is unmanaged and has a large amount of scrub re-establishing within it, following clearance some years ago. It is likely to provide important roosting, nesting and resting sites for birds as well as a foraging area for bats. Development would result in the removal of some of these trees (for access) Development is likely to be detrimental to the nature conservation interests. Full surveys would be necessary to determine impact.</p> <p>Without detailed soil analysis it is difficult to assess the potential for chalk grassland restoration as the site lies towards the bottom of a dry valley.</p>				
<p>EIA Screening: necessary due to size.</p>		<p>Appropriate Assessment: it would be necessary to contribute to the Thanet coast mitigation strategy and there would need to be consideration of in-combination impacts on the Dover to Kingsdown Cliffs SAC.</p>		
<p>Green Infrastructure The site is in an area characterised by very low density housing with large spaces between, some golf course, some horse pastures, others scrub and ex-scout camp. It forms part of an important space for</p>				

low-level recreation and tourism.

National Cycle Path 1 runs along the southern boundary. Development would be damaging to this resource.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site does not have any existing vehicular access points. The topography of the site does not enable safe access from either the north west or south eastern boundaries. The land to the north west and to the south east drops steeply away from the respective roads running along this part of its boundary (Northcote Road and Old Stairs Road respectively). The boundary of the site is wooded and these would have to be removed to improve visibility. The immediate road network is also not suitable as it consists of unadopted roads. The road network is not suitable to serve the level of traffic generated by a development of this size.

Access to Services SHLAA Score: 2.0 – Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is ten minutes walk away from the nearest bus stop. The walk to the local primary school or village centre would take longer than fifteen minutes.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

There is no acceptable access on to the site due to its topography and the nature of the surrounding road network. Furthermore, any development would have an unacceptable impact on the landscape and the nature conservation interests. Thus this site is not suitable for future residential development.

Consider for inclusion in the Submission Document?

No

Site Code KIN06	Address Site to the west of Kingsdown Park Holiday Village, Kingsdown	Parish Ringwould with Kingsdown Hierarchy Village	Overall SHLAA Score 27 (Undeliverable)	Area 1.47 Ha Indicative No. of units @ 30 dph = 44
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site An irregular shaped site located on the eastern side of Kingsdown. The site consists of grassland/meadow with mature trees around the boundary of the site. The site is on the ridge of the hill and the land falls away to the north. To the north and west of the site there are residential properties, whilst to the east there is a holiday park. To the south there is a camping ground.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The northern boundary of the site is adjacent to the Kingsdown Conservation Area. The swathe of trees to the northern part of the site form a very important backdrop to the Conservation Area to the north. Development of this site would have to ensure that these trees are retained in their existing state, height reduction would be unacceptable.				
Landscape Impact The site is at the ridge of a hill and is visible from a great distance (the site is clearly visible from the northern extremes of the village). Any development, particularly on the southern part of the site, would cause a ‘massing’ of built form and have a detrimental impact on the setting of the village. This view was supported by the Inspector in a planning appeal (APP/X2220/A/04/1155367 for DOV/04/00258) who concluded that the addition of 40 holiday chalets ‘... would be prominent in the wider landscape and detract from the setting of Kingsdown, and would be contrary to the established planning policies which seek to protect the countryside from unnecessary development’.				
Biodiversity The site is wooded to the north, with the rest of the site being rough grassland and scrub, recorded as neutral grassland in the 2003 Kent Wildlife Habitat Survey. However, it probably overlies chalk bedrock and, as such, there is a significant potential for biodiversity enhancement on this site. In its existing state the site probably supports a wide variety of wildlife. Development would have a detrimental impact on this habitat resource.				
EIA Screening: necessary due to size.		Appropriate Assessment: it would be necessary to contribute to the Thanet coast mitigation strategy and there would need to be consideration of in-combination impacts on the Dover to Kingsdown Cliffs SAC.		
Green Infrastructure The site is crossed by two well-used local PRow, footpaths ER7 and ER8 which provide connection being the village and the cliffs and coast to the south. It is important to maintain the ambience of these links. The location of the site offers biodiversity opportunities. If development were taken forward a careful SUDs design would be required to optimise those opportunities.				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site has an existing access. This is from Upper Street, through the Holiday Park parking area and onto a track which runs into the site. The existing access road would not be capable of accommodating development of this envisaged size. The site is also close to The Avenue, which is a single track, unadopted road. The roads leading to The Avenue from Upper Street are also unadopted. The road network is not suitable to serve the level of traffic generated by a development of this size. To enable development of this scale, the road network would have to be considerably improved and this would involve widening (including third party land from individual properties), street lighting and footpaths. This would be detrimental to the character of the village.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

Although the site is close to the local primary school, the route which would have to be taken may mean that walking to the school from this site may take more than five minutes. The bus stop is also approximately a five minute walk.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Development of this site would have a detrimental impact on the landscape and the setting of the village. This was the main reason for refusal by a Planning Inspector in the past. The trees on the northern part of the site are crucial to the setting of the adjoining conservation area. The potential for the site for biodiversity enhancement indicates that it should not be lost for other purposes. The existing access road would not be capable of accommodating development of this envisaged size. Development would, therefore, be unacceptable on this site.

Consider for inclusion in the Submission Document?

No

Site Code KIN07	Address The Scout Camp buildings and land running southwards from Woodlands, The Avenue, to the junction of Kingsdown Hill and Old Stairs Road.	Parish Ringwoud with Kingsdown	Overall SHLAA Score 26.5 (Undeliverable)	Area 3.72 Ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 112	
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site <p>Two irregular shaped pieces of land, located on the edge of the camping ground (see KIN02M). The smaller of the two parts of the site, located to the north, consists of buildings related to the camp site (storage and a communal centre), a residential property and managed informal grass. This part of the site also incorporates the main access to the rest of the camping ground. The site falls gently to the south and to the east. This site has hedging along the southern boundary and the northern boundary. There are trees concentrated at the entrance to the west. The surrounding uses consist of residential to the west, open land (KIN06) and holiday park to the north, the camping site to the east and south. There are also two residential properties to the south which separate this area with the second part of the site.</p> <p>The second part of the site is an irregular shaped strip of land that runs down the western boundary of the camping ground and consists of woodland (to the north and south) and grass land (the central part). The site falls southwards. The neighbouring uses include residential (to the north and west), scrubland (to the south), the camping site (to the east, although there is no specific boundary line).</p>				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The sites are both adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed There are trees on both parts of the site.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The northern site lies on a ridge backed by trees and hedging. It already contains a number of buildings and hard landscaping associated with its previous use. Redevelopment of these buildings would have little or no landscape impact, however, the semicircular area of grassland to the east of this part of the site would create an anomalous feature in the landscape if developed. The southern site comprises grassland and protected woodland abutting the eastern side of the developed area of Kingsdown. Development here would result in an over urbanisation on the village edge and result in an adverse impact on the wider landscape and the setting of the AONB and Heritage Coast. It would lead to intense pressure to remove the tree cover to gain wider landscape and seascape views, exacerbating the harm to the setting of the AONB and heritage Coast.				
Biodiversity The northern site has grassed areas and some ornamental trees. The biodiversity interest here is likely to be small with little opportunity for enhancement. The bulk of the site is part of the Walmer and				

Kingsdown Golf Course LWS and as such is protected under Policy CP7.

The eastern and western boundaries of the southern site are heavily treed and there is woodland in the south west. There will be biodiversity interest associated with the trees and wood and they may be particularly important for bats. The grassland between is unclassified in the Kent Wildlife Habitat survey 2003, but because of the underlying chalk bedrock will have the potential for chalk grassland restoration. Development here would be unacceptable.

EIA Screening: necessary due to size	Appropriate Assessment: it would be necessary to contribute to the Thanet coast mitigation strategy and there would need to be consideration of in-combination impacts on the Dover to Kingsdown Cliffs SAC.
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Green Infrastructure
 The site is bounded by two PRoW: footpath ER8 on the N and ER7 on the W. It contains trees subject to TPO. The current use of the site is unknown. The site contributes to the general setting of the AONB and provides county-level biodiversity interest. Development could only result in harm to the GI resource.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site
 The land to the north has an existing access onto The Avenue, which is a single track, unadopted road. The roads leading to The Avenue from Upper Street are also unadopted. The road network is not suitable to serve the level of traffic generated by a development of this size. To enable development of this scale the road network would have to be considerably improved and this would involve widening (including third party land from individual properties), street lighting and footpaths. This would be detrimental to the character of the village.
 There is no suitable access for the southern part due to the topography, tree cover and width of adjoining roads.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk
 The SHLAA score reflects the proximity of the site to the nearest bus stop and the local primary school.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis
 The wider road network is not suitable for the scale of residential development envisaged as this is on the whole, single track (unadopted) and would require enhancing with widening, street lighting, and footways (using third party land). These measures would be detrimental to the character of the village.
 The site is part of a LWS and is protected under Policy CP7.
 The site also provides a vital role in softening the transition from urban form to the open countryside (AONB). Development of this site would, therefore, have a detrimental impact on the AONB and wider landscape. Development could also threaten protected trees.

Consider for inclusion in the Submission Document? **No**

Site Code KIN02M	Address Former Scout Camping ground, The Avenue, Kingsdown. For mixed use (residential units and holiday chalets).	Parish Ringwold with Kingsdown Hierarchy Village	Overall SHLAA Score = 26.5 Initial Score = Mixed use	Area 9.81 Ha Indicative No. of units @ 30 dph = 294
Current Use Initial SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Large irregular shaped site consisting of open grassland used as a campsite. The site falls to the south and has mature trees along most of the boundary. There are some storage buildings surrounded by trees in the centre of the site. Suggested for mixed use including residential and holiday chalets. To the north there is a holiday park and there are some residential units to the south. To the west lies land submitted under reference KIN07. To the east there is the coast.				
Policy Alignment Initial SHLAA Score: 3.0 – Completely Outside Development Envelope and no designation but Impacting upon Environmental Constraints The site is not adjacent to the settlement confines.				
Physical Constraints Initial SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows, to be addressed The site falls gently to the south and there are mature trees.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is an open area which falls gradually towards the sea to the east (Undeveloped Coast) and Old Stairs Road to the south. The open land to the south has been designated as AONB & the wider landscape. The site is very exposed and represents a cliff edge downland which would not be amenable to any landscape planting. Any development of the site would have a detrimental impact on the setting of the AONB & the wider landscape; it would also compromise the Undeveloped Coast designation.				
Coastal Change A small portion of the site, to the east, lies within the Oldstairs Bay Coastal Change Management Area. Given that the land has been put forward for and extension to the holiday park then this designation would not prohibit this form of development.				
Biodiversity The site includes protected trees and is part of Walmer and Kingsdown Golf Course LWS. It is, therefore, protected under policy CP7 The main biodiversity interest will be in the grassland flora and fauna. As the site directly overlays chalk bedrock there will be the opportunity for reinstatement of chalk grassland (a UK BAP priority habitat). On nature conservation grounds this site should not be developed.				

EIA Screening: necessary due to size.	Appropriate Assessment: it would be necessary to contribute to the Thanet coast mitigation strategy and there would need to be consideration of impacts on the Dover to Kingsdown Cliffs SAC.
<p>Green Infrastructure</p> <p>The site is bounded by two PRoW: footpath ER8 on the N and E and ER7 on the W. It contains trees subject to TPO. The current use of the site is unknown. The site contributes to the general setting of the AONB and provides county-level biodiversity interest. Development could only result in harm to the GI resource.</p>	
<p>Proximity to Road Network Initial SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site, as identified, does not have direct access onto the highway network. Access to the site has traditionally been through the scout camp area to the north west of the site, which has been put forward as a separate site (KIN07). This access is from The Avenue, which is a single track unadopted road. The roads leading to The Avenue from Upper Street are also unadopted. The road network is not suitable to serve the level of traffic generated by a development of this size. To enable development of this scale the road network would have to be considerably improved and this would involve widening (including third party land from individual properties), street lighting and footpaths. This would be detrimental to the character of the village.</p>	
<p>Access to Services Initial SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>A bus stop and the Primary School would be within a ten minute walk of the site. However these type of services are less likely to be of interest in connection with a proposal for an extension to the Holiday Park.</p>	
<p>Market Attractiveness Initial SHLAA Score: 4.0 – Higher Value, High Cost</p>	
<p>Ownership Initial SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Any development of the site would have a detrimental impact on the setting of the AONB, the wider landscape and would also compromise the Heritage Coast designation. The site is also important for biodiversity. The road network leading to the site is not suitable for the envisaged amount of development as they are single track and unadopted and would require enhancing with widening, street lighting, and footways (using third party land). These measures would be detrimental to the character of the village.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code KIN03	Address Land at the end of Victoria Road, Kingsdown	Parish Ringwould with Kingsdown Hierarchy Village	Overall SHLAA Score The site is located in the AONB and is not considered in the SHLAA	Area 0.18 Ha Indicative No. of units @ 30 dph = 5
Current Use SHLAA Score: --				
Description of Site				
<p>The site is triangular in shape with the majority lying behind the garden of the neighbouring property. The site slopes down from the north east and has the appearance of an established garden (although there is no planning history for this use) contained within a high conifer hedge. Aside from the neighbouring property the site is bounded by open countryside on the three other boundaries. The site is located within the AONB.</p>				
Policy Alignment SHLAA Score: --				
The site is adjacent to the settlement confines and within the AONB.				
Physical Constraints SHLAA Score: --				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
<p>The site has been subject to a planning appeal in 2003 for the development of one 'earth sheltered' dwelling. The appeal was dismissed on the grounds that, as development was outside the settlement confines, it would be contrary to policies that seek to promote sustainable forms of development. The Inspector did, however, suggest that any alteration to the boundary should be made through a future review of the Local Plan.</p>				
Landscape Impact				
<p>It is in a prominent position on the edge of the village, just within the AONB. The site has been subject to a planning appeal in 2003 for the development of one 'earth sheltered' dwelling. The second ground for dismissal in 2003 was that development would extend the built form into the countryside to the detriment of the character and appearance of the area.</p>				
Biodiversity				
<p>The site has the appearance of an established garden and there will be the wildlife interest associated with this, such as common reptiles. The proximity of chalk bedrock to the surface would give an opportunity for chalk grassland creation.</p>				
EIA Screening: too small		Appropriate Assessment: too small		
Green Infrastructure				
<p>This is a small, but important site in that two boundaries are also PRow bridleways: ER24 to the E and ER23 to the N. Running from the N boundary is footpath ER18 that leads to Kingsdown Woods (NT property). The site sits, effectively at a crossroads of popular recreational walking and riding routes. Development of this site would adversely affect the ambience of this edge of the AONB and its setting. Development would damage GI interests.</p>				
Proximity to Road Network SHLAA Score: --				
The site has a short road frontage with an existing access. This would only be suitable for one or two dwellings, as the access is restricted and Victoria Road is only a narrow, unadopted road.				
Access to Services SHLAA Score: --				

The site lies some distance from the Primary School, which is likely to be further than a ten minute walk. However a bus stop would be within a ten minute walk.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is in a prominent position on the edge of the village, just within the AONB. Any development of the site would have a detrimental impact on the AONB. Development of this site would adversely affect the ambience of this edge of the AONB and its setting. Development would damage GI interests.

Consider for inclusion in the Submission Document?

No

Site Code KIN03C	Address Land between Innisfree & Glendale Lodge, Glen Road, Kingsdown	Parish Ringwould with Kingsdown	Overall SHLAA Score The site is too small to be scored in the SHLAA	Area 0.04 Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 1
Current Use SHLAA Score: --				
Description of Site				
A small triangular site within in the rear garden of Innisfree. The garden is square and is surrounded by a hedge. The site has been submitted as a request for a change of confines. To the north, east and west lies existing residential development located within the settlement confines. To the south lies open countryside. The site has been submitted for a confine change.				
Policy Alignment SHLAA Score: --				
The site is adjacent on two sides to the settlement confines.				
Physical Constraints SHLAA Score: --				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
The existing settlement confines follow the rear gardens of Glen Road until it reaches Innisfree where it cuts in and then returns back to follow the rear gardens leaving a triangle of land outside of the confines. There does not appear to be a logical boundary line which the confines follow as the garden line of Innisfree is similar to that of the rest of Glen Road.				
Landscape Impact				
If development resulted from the change in village confines this would lead to an intensification of the village edge. Development, however, could only take place is part of or all of Innisfree was demolished.				
Biodiversity				
No specific issues, as the site is already managed as part of a garden.				
EIA Screening: unnecessary			Appropriate Assessment: not relevant	
Green Infrastructure				
Public Bridleway ER 21 passes quite close to the W boundary, but the proposed change of confines will not adversely affect this. Overall, the proposal is GI neutral.				
Proximity to Road Network SHLAA Score: --				
If development resulted from the change in settlement confines there would be insufficient frontage for access. An access would require third party land.				
Access to Services SHLAA Score: --				
The site is located within a five minute walk of both the Primary School and a bus stop.				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis				

Settlement confines should follow identifiable boundary lines. The settlement confine as it stands does not follow an identifiable boundary line behind the property of Innisfree and, therefore, should be changed at this point. The boundary should be amended to follow the rear boundary of the property and continue the line established by neighbouring properties.

Any development that may result from the change of settlement confine should be considered against policies in the LDF and other material considerations.

Consider for inclusion in the Submission Document?

Yes

Site Code NS01KIN	Address Land to the rear of Ivy Cottage, Upper Street, Kingsdown	Parish Ringwould with Kingsdown Hierarchy Village	Overall SHLAA Score Too small, not considered.	Area 0.06Ha Indicative No. of units @ 30 dph = 1
Current Use SHLAA Score: --				
Description of Site The site is a rectangular piece of land lying immediately to the rear of a number of terraced properties which front Upper Street. Existing residential development, located within the settlement confines, lies to the north, east and west. To the south lies undeveloped land, this has been submitted for consideration under reference KIN06.				
Policy Alignment SHLAA Score: --				
The site lies outside, but immediately adjacent to both the settlement confines and the Conservation Area.				
Physical Constraints SHLAA Score: --				
There are a number of mature trees.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site is located immediately adjacent to the Conservation Area. Any development of the site would go against the existing urban grain. Access to the site is only possible via Upper Street, which lies within the Conservation Area. In order to achieve adequate sight lines it would require a major intervention into the street scene, which would be detrimental to its character.				
Landscape Impact Development would not have a direct landscape impact, but the neighbouring trees to the south are highly important in setting a backdrop to the central part of the village and their close proximity to development would lead to pressure for substantial reduction, which would be harmful to local landscape.				
Biodiversity Potentially common reptiles associated with gardens may occur here.				
EIA Screening: too small		Appropriate Assessment: too small		
Green Infrastructure No impact.				
Proximity to Road Network SHLAA Score: --				
Upper Street is subject to a 30mph speed limit and is without traffic regulation orders. The proposed access is very tight and sight lines would cross land outside of the applicants control as well as being severely hindered by on street parking. There are no footways on Upper Street and the carriageway is very narrow in the vicinity of the proposed access. In the interest of highway safety KCC Highways would oppose such an access in this location.				

Access to Services SHLAA Score: --

The site lies within a five minute walk of both the Primary School and a bus stop.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Development of the site would produce an urban form which goes against the current urban grain. This would be out of keeping with the adjacent Conservation Area and detrimental to its setting. Furthermore, in terms of highway safety, it would not be possible to achieve a satisfactory access.

Consider for inclusion in the Submission Document?

No

Site Code (SUT07) SAD30	Address Land adj to Raspberry Cottage, Church Lane, Ripple	Parish Ripple	Overall SHLAA Score 33 (6-10 Years)	Area 0.18 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Agricultural land which is situated on a ridgeline, and has no natural boundaries to the north and west. Church Lane forms the southern boundary and there is existing residential development to the south-west. The neighbouring property is well screened, located behind hedges and trees. The land falls away from Church Lane.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site lies outside, but adjacent to, the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site sits on a ridge facing west with long views across the valley. It is contiguous with the terraced houses of Portland Terrace. The incremental growth of the village along the road is an adverse factor as it could eventually lead to ribbon coalescence of properties along Church Lane which would have a severely adverse impact on the wider landscape and contribute to urban sprawl in the area.				
Biodiversity There are no particular biodiversity concerns except perhaps for farmland birds as the site is under arable agriculture.				
EIA Screening: too small to be needed		Appropriate Assessment: too small to be needed.		
Green Infrastructure To the NW of the site is PRow EE430A which meets EE430B further along Church Lane. Development will have an adverse impact on EE430A due to its close proximity. Development could not provide mitigation for this due to its limited size. Development could lead to a minor enhancement of biodiversity, associated with gardens. Overall the site is GI neutral.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Church Lane is a single track road 30mph road. Visibility is not likely to be achievable with third party land likely to be needed. The site is remote with no footways and is therefore likely to be car reliant.				
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk Ripple is designated as a Village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site. In addition there is a Village Hall and a public house. The primary				

school closed in 2007 and Ripplevale School, just outside the village to the east, is an independent special school. Ripplevale operates on two sites (including the former KCC primary school).

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The highway comments received suggest that it would not be possible to achieve a satisfactory access; furthermore, there are no pedestrian footways and as a consequence there would be heavy reliance on unsustainable transport options (the private car). Development would extend the built form of the village and could set a precedent for incremental growth along Church Lane leading to the coalescence with the housing surrounding the Church. Ribbon development should be resisted to prevent urban sprawl.

Recommend for inclusion in the Submission Document?

No

St. Margaret's at Cliffe

Site Code STM04	Address Land to the North of Nelson Park, St Margaret's at Cliffe	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored as within AONB	Area 0.63 Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 19
Current Use SHLAA Score:				
Description of Site A square shaped horse paddock located some distance to the north of Nelson Park. The site is completely surrounded by open fields consisting of either more horse related land or agricultural. The site has hedgerow on three sides with the forth side being open to the NE. Access is from a track.				
Policy Alignment SHLAA Score: -- The site is located some distance from the settlement confines, which therefore could not be easily extended to cover this site. The site is also located within, and entirely surrounded by, the AONB.				
Physical Constraints SHLAA Score: --				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment This is a former champagne plot (speculative development proposal) of the Nelson Park Estate.				
Landscape Impact The site is a relatively flat paddock situated within the AONB designation. The site has no relationship with the existing built form and any development would have considerable adverse impact on the countryside and the landscape designations.				
Biodiversity The biodiversity on the site is limited somewhat by the grazing regime, but probably supports common reptiles. There is a scrub hedgerow which may provide flight-lines for bats.				
EIA Screening: Necessary due to AONB and size			Appropriate Assessment: would need to contribute to Thanet Coast SPA mitigation strategy.	
Green Infrastructure The site is bounded on three sides by unadopted tracks, with Beresford Road to the SW also being a PROW ER283. The whole area, with its linear arrangement of tracks reflects speculative early 20 th century land-dealing, but has since become an important resource for rural recreation in the AONB and is highlighted in the Core Strategy GI network as an area to 'restore and conserve'. Development would run counter to those objectives and diminish the GI resource.				
Proximity to Road Network SHLAA Score: -- The site is accessed via Victory Road which is a single track running beyond Nelson Park Road. The track is unadopted and unmade and would need to be made to adoptable standard. There are footways along Nelson Park Road which continue along Station Road and link to St Margaret's at Cliffe High Street. However, these do not continue along the track to the site. There is a public footpath (ER283) running alongside the site. The site is some distance from local services with poor pedestrian safeguarding and reliance on the car is likely to be high.				
Access to Services SHLAA Score: -- Nelson Park is itself situated approximately half a kilometre away from St. Margaret's at Cliffe. Nelson Park has no local facilities (shops, schools etc).				

Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis The site is completely divorced from the existing built form, it has poor access, is not well related to the highway network and any development would have a detrimental impact on the AONB.	
Consider for inclusion in the Submission Document?	No

Site Code STM01C	Address Land to the rear of Tamar, Utne, Acer and Green Meadows (including the Riding School), Seymour Road, Nelson Park, St Margaret's at Cliffe. Request to extend the village confine boundary.	Parish St Margaret's at Cliffe	Overall SHLAA Score Not assessed in SHLAA – confine change	Area 0.32 Ha
		Hierarchy Village		
Current Use SHLAA Score: --				
Description of Site An established equestrian centre with stables located on a rectangular, flat, site at the north east corner of Nelson Park. The site has low rise stables on the northern part of the site and paddocks on the southern half. The site has hedgerows around the majority of the boundary. Other than residential properties to the south west, the site is surrounded by agricultural fields.				
Policy Alignment SHLAA Score: --				
The site is outside, but adjacent to, the settlement confines. The site is located within the AONB.				
Physical Constraints SHLAA Score: --				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment No considerations Landscape Impact The site lies on relatively flat ground discretely located at the edge of the built form. It is within the AONB. Operations such as this are commonly found at the boundary between village and countryside and reflect the setting of the village. Containment within the settlement confines could lead to an erosion of the soft village edge. Biodiversity There is unlikely to be a substantial biodiversity interest on this site.				
EIA Screening: S2.10 screening required due to being in AONB.		Appropriate Assessment: too small to require consideration.		
Green Infrastructure The site lies between Nelson Park Road and Hardy Road, both tracks leading into the countryside NE of St Margaret's. The site is currently stables, which may be considered to contribute to GI through opportunities for healthy activity and as such are suitably located on the village edge.				
Proximity to Road Network SHLAA Score: -- The surfaced road stops at the junction of Nelson Park Road and Seymour Road. Nelson Park Road then continues as a track. There is an access to the stables from the track. Highway improvements would be required to the track if any development were to take place.				
Access to Services SHLAA Score: Nelson Park is situated approximately half a kilometre away from St. Margaret's at Cliffe. The site is within walking distance of bus stop but otherwise Nelson Park has no facilities (shops, schools etc).				

Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
<p>The area of land requested to be included within the village confines has a distinct rural character rather than the urbanised character of the rest of Nelson Park. The land lies within a sensitive landscape area, which has been designated as AONB. The settlement confines ensure that the urban area does not spread into the countryside to the detriment of the acknowledged important landscape.</p>	
Consider for inclusion in the Submission Document?	No

Site Code STM03	Address Land at the junction of Station Road (B2058) and Nelson Park Road, Nelson Park, St Margaret's.	Parish St Margaret's at Cliffe	Overall SHLAA Score Site is located within the AONB – not scored in SHLAA	Area 0.19 Ha
Hierarchy Village				
Indicative No. of units @ 30 dph = 6				
Current Use SHLAA Score: --				
Description of Site Flat, rectangular shaped site located at the south west corner of Nelson Park (where Nelson Park Road meets Station Road). There are hedgerows along the boundary, except along Nelson Park Road. Part of the site is currently used for storage of chalk with the rest being managed grassland/scrub. There are residential properties, located within the settlement confines, to the north east and south east of the site. Agricultural land lies to the north west and south west (on the opposite side of Station Road).				
Policy Alignment SHLAA Score: --				
The site lies outside, but adjacent to, the settlement confines. Site lies within Groundwater Protection Zone 1 and the AONB.				
Physical Constraints SHLAA Score:--				
The site is flat with no obvious constraints.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
The site falls within the AONB. This site is in a prominent position and was identified in the past as a site which helped to 'soften' the edge of the Nelson Park development in relation to the landscape designations. The site was identified in the 1982 Nelson Park Development Brief to be retained as open space and the site was subsequently excluded from the village confines in the adopted 2002 Local Plan. The last planning application for this site (DOV/00/00889) was refused on the grounds that the proposal (for three detached dwellings) would result in the unacceptable intrusion into the countryside which is within the designated Kent Downs AONB.				
Biodiversity				
The site is rough grassland with a high proportion of tall ruderal plants. There will be some biodiversity interest associated with the grassland, including common reptiles, but there are not sufficient biodiversity grounds to reject this site.				
EIA Screening required due to being in the AONB.		Appropriate Assessment: too small to require assessment.		
Green Infrastructure				
There is some hedgerow connectivity, which should not be lost in development and a limited biodiversity interest, but aside from this the site does not form part of any network.				
Proximity to Road Network SHLAA Score: --				
There is no existing access onto the site. An access could be established onto Nelson Park Road but this would be limited to around three units.				

An access onto Station Road would be unacceptable due to the restricted sight lines and the speed of road (it is derestricted).

Access to Services SHLAA Score: --

The site is situated on the western boundary of Nelson Park. Nelson Park is itself situated approximately half a kilometre away from St. Margaret's at Cliffe. The site is within walking distance of a bus stop but otherwise Nelson Park has no local facilities (shops, schools etc).

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Whilst there has been a history of refusals for residential in the past, it is considered that there is potential for development in this location over the next twenty year period. Development will be limited, however, to a maximum of three, low rise units. This is due to its prominent position within the AONB. Due to this low number of units it is proposed that the site is not allocated but the village confines are changed to include the site.

Consider for inclusion in the Submission Document?

Yes

Site Code STM01/ STM07	Address Land to the rear of Jean, Kerry Croy, Eriskay and Little Orchard, St Vincent Road, Nelson Park, St Margaret's at Cliffe.	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored due to location within AONB	Area 0.24 Ha
Current Use SHLAA Score: --				
<p>Description of Site A square site located behind residential properties off Station Road. There are two possible access points from Station Road, both are private roads/track and serve two and three residential properties. There is open countryside to the north and east. The site boundary consists of mature hedgerows. The site is located on a hill side rising to the north west.</p> <p>The site is currently left as grassland but a small area (close to the access) has been used for storing building materials.</p>				
Policy Alignment SHLAA Score: --				
The site is adjacent to the settlement confines and located within the AONB.				
Physical Constraints SHLAA Score: --				
The land rises to the north west so there is a slope.				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
The site lies within the AONB. Although the site is bounded to the north and west by existing dwellings, the site is on a hillside and highly visible from the south. Development of this site would, therefore, have a detrimental impact on the AONB by furthering intrusion into the protected landscape.				
Biodiversity				
The site has been disturbed and subject to illegal tipping. There may be some common reptile interest. The area covered by STM07 has potential for chalk grassland restoration.				
EIA Screening: required due to being in AONB		Appropriate Assessment: too small to need considering.		
Green Infrastructure				
Footpath ER28 runs along the rear of STM07 and the use of this would be adversely affected by development. The site is within the AONB in an area highlighted in the Core Strategy GI network for restoration and conservation, prohibiting further development.				
Proximity to Road Network SHLAA Score: --				
There are three access points onto the site. There are two tracks from Station Road, one which serves two existing properties and The Close Nursery, and another track that serves two properties. Both track are narrow and are not of an adoptable standard and would only be able to serve five units (including existing properties) of each. Development on site would, therefore, be limited.				
The third point of access is in the form of a track onto the site from St Vincent Road but this appears to be only suitable for pedestrian use as it is narrow. If this was widened it would require third party land.				

Access to Services SHLAA Score: --

The site is situated on the eastern boundary of Nelson Park. Nelson Park is itself situated approximately half a kilometre away from St. Margaret's at Cliffe. The site is within walking distance of bus stop but otherwise Nelson Park has no facilities (i.e. shops, schools etc).

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Although an acceptable access for a limited number of units could be achieved for this site, there is an overriding objection from a landscape perspective as development would have a detrimental impact on the AONB given the site is located within this national designation.

Consider for inclusion in the Submission Document?

No

Site Code STM02C	Address Land behind Lindley, Station Road, St Margaret's at Cliffe	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored due to size and change of confines	Area 0.14 Ha
Hierarchy Village				
Current Use SHLAA Score: --				
Description of Site A request for an amendment to the confines to include part of the rear garden of Lindley, located on Station Road on the north western edge of St Margaret's. The boundary appears to consist of hedgerows and mature trees. A larger site was submitted for consideration prior to the Preferred Option stage; however this was reduced in size with a submission as part of the Preferred Options representation.				
Policy Alignment SHLAA Score: --				
The site is outside the settlement confines. A residential permission has been granted behind Lindley but this is within the settlement confines. The site lies within the AONB and Groundwater Protection Zone 1.				
Physical Constraints SHLAA Score: --				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site is level and bounded by mature trees and hedging. It is within the AONB. It is one of a row of very deep rear gardens, some of which are used as such, others being left to go 'wild'. Past records show this site was used for horse grazing. While there has been some very limited backland development, this has close association with the houses on Station Road. If the confine was to be amended as suggested, any development would be visible, due to the undulating topography, and have an adverse impact on the AONB.				
Biodiversity There will be an undoubted biodiversity interest associated with the mature boundaries. The area appears suitable for foraging bats. Records dating back to the time it was horse grazed indicate that it only had a poor flora. Generally, this area overlies chalk bedrock and there would be opportunities for biodiversity enhancement by appropriate grassland management. Common reptiles are likely to be present.				
EIA Screening: required due to being in AONB		Appropriate Assessment: too small to be required		
Green Infrastructure The site is one of a set of very deep back gardens that is bounded to the NE by PROW ER28. Further off, but crossing diagonally to the rear of this site is PROW ER41. Development here would create an anomalous sense of urbanisation in this locality. The biodiversity interest of the site may be currently limited, but the site is within the 'restore and conserve' area for GI improvements which are primarily based on biodiversity and landscape. The inclusion of this site within the confines would run counter to the aspirations associated with Policy CP7 in the Core Strategy.				
Proximity to Road Network SHLAA Score: --				
The existing property, Lindley, is served by an existing private driveway off Station Road. The driveway currently services one property, with four additional units proposed.				

The speed limit on Station Road changes from 60 to 30mph between the driveway and the turning into Dover Road, with the driveway within the 60mph zone. It is likely that sight lines are achievable. A footway runs in front of the driveway and links to St Margaret's Cliffe High Street. In order to provide access the driveway should be 4.1m wide for the first 6m and all vehicles must be able to enter and exit in forward gear. There should also be a turning head provided on the site for delivery vehicles and parking for the existing property should be maintained.

Access to Services SHLAA Score: --

St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The property already has planning permission for a residential unit behind Lindley but this is within the settlement confines. A change in confines would allow development further back from Station Road and into the AONB. Due to the topography of the area such development would be highly visible and detrimental to the AONB. Furthermore, it would go against the existing linear urban grain of the settlement and should therefore be resisted.

Consider for inclusion in the Submission Document?

No

Site Code NS01STM	Address Land and No.2 Townsend Farm Road St Margaret's at Cliffe	Parish St Margaret's at Cliffe	Overall SHLAA Score = 27	Area 0.18
		Hierarchy Village		
Indicative No. of units @ 30 dph = 5				
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site The site comprises No. 2 Townsend Farm Road, a bungalow, together with its curtilage. The garden is laid to lawn enclosed by a simple post and rail fence which allows views into the site. To the rear of the bungalow (south east) lies a field (see NS02STM and NS03STM). To the south and west lies the access road to the affordable housing scheme, Ash Grove. The Council's policy is for all rural exceptions schemes to remain outside the settlement confines in perpetuity. To the north of the site lies another field, submitted separately as part of SHL073.				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or Green Wedge, Green Corridor or Historic Park. Outside development envelope and non-housing designation.				
The site lies outside, but immediately adjacent to, the settlement confines.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Historic Environment The Conservation Area lies to both the north east and north west of the site. Development of the site would need to be restricted to the area of the paddock which is on the same level as the property (No. 2 Townsend Farm Road). The land on the south east and south western boundaries of the paddock rises by a couple of metres, and in order to reduce the impact on the Conservation Area should remain undeveloped. (A diagram to show the area which could be developed will be provided).				
Landscape Impact Development would affect the setting of the AONB which abuts SW boundary and this would need to be reflected in the housing design and density.				
Biodiversity Biodiversity interests would be minimal on this site.				
EIA Screening: too small to be required.		Appropriate Assessment: too small to consider.		
Green Infrastructure The site contributes little to GI, except in the provision of soft urban-fringe.				
Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site				

If the land in question is only to serve 5 dwellings then this could be served by a private drive. The site is within walking distance of village amenities and the bus route. The highways abutting are subject to 30mph speed limit and footways already exist in the area to link to the High Street.

Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school

St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 - Single Private Ownership

Analysis

The site comprises No. 2 Townsend Farm Road and its curtilage. Given that the property occupies approximately one third of the site, the capacity of the remaining portion would be limited to three dwellings. Since any development of this site would have a detrimental impact on the setting of the AONB it is not considered there is sufficient justification for a development of only three units.

Consider for inclusion in the Submission Document?

No

Site Code NS02STM	Address Land and No.2 Townsend Farm Road and Ash Grove, St Margaret's at Cliffe	Parish St Margaret's at Cliffe	Overall SHLAA Score = 27	Area 0.88
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>This site includes all the land submitted as NS01STM namely No. 2 Townsend Farm Cottages and curtilage and the part of NS03STM - the paddock to the rear of Townsend Farm Cottages. In addition, the site includes all properties located within the rural exceptions scheme, Ash Grove. The Council's policy is for all rural exceptions schemes to remain outside the settlement confines in perpetuity.</p> <p>To the north and east of the site lie existing residential properties located with the settlement confines. To the north west of the site lies another field, submitted separately as part of SHL073.</p>				
<p>Policy Alignment SHLAA Score: 1.0 - Outside development envelope, fully within open space or statutory nature reserve or Green Wedge, Green Corridor or Historic Park. Outside development envelope and non-housing designation</p>				
<p>The site is located outside, but immediately adjacent to the settlement confines. The site is also located within the AONB.</p>				
<p>Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>Development of the site would need to be restricted to the area of the paddock which is on the same level as the property (No. 2 Townsend Farm Road). The land on the south east and south western boundaries of the paddock rises by a couple of metres, and in order to reduce the impact on the Conservation Area should remain undeveloped. (A diagram to show the area which could be developed will be provided).</p> <p>When the rural exception affordable housing development was built on the site of a Saxon burial ground was discovered and there may be archaeological constraints that would need to be investigated if this site was to come forward for development. Likewise, the site may have some association with underground wartime structures.</p>				
<p>Landscape Impact</p> <p>The site includes Ash Grove that lies within the AONB. The paddock (NS03STM) contains trees that provide some screening of Ash Grove from the village and development of the paddock would lead to the spreading of a high-density development, unscreened, along the village fringe in a highly visible location with concomitant adverse impact on the AONB.</p>				
<p>Biodiversity</p> <p>Biodiversity will be limited. Bats may use the edges of the paddock, as would common reptiles.</p>				
EIA Screening: necessary due to dph number and location			Appropriate Assessment: contribution to the Thanet Coast mitigation strategy would be necessary.	

Green Infrastructure	
The site contributes little to GI, except in the provision of soft urban-fringe.	
Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site	
Any layout to support the new dwellings will need to be to an adoptable standard. The site is within walking distance of village amenities and the bus route. The highways abutting are subject to 30mph speed limit and footways already exist in the area to link to the High Street.	
Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.	
Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 4.5 - Single Private Ownership	
Analysis	
The paddock provides some screening of Ash Grove, although the larger trees are within the curtilage of No. 2 Townsend Farm Cottages. Any development of the site would be in a highly visible location, and the tree screening to the south west of the paddock, adjacent to Ash Grove, would need to be retained. The impact on the nearby Conservation Area would be minimal if the development of the paddock was restricted to the flat portion of the site, and the raised area to the south east and south west remained undeveloped. Ideally any development of the site should include both No. 1 and No. 2 Townsend Farm Cottages.	
Consider for inclusion in the Submission Document?	Yes
See diagram to detail constraints/ opportunities. Will require individual policy.	

Site Code NS03STM	Address 1 The Paddock, Townsend Farm Road, St Margaret's at Cliffe	Parish St Margaret's	Overall SHLAA Score = 28.5	Area 0.39
		Hierarchy Village		
Indicative No. of units @ 30 dph = 11				
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site includes No. 1 Townsend Farm Cottages and the paddock to the rear. The property and its curtilage is located within the settlement confines, however the paddock is not. To the south west lies No. 2 Townsend Farm Cottages which lies outside of the settlement confines. Ash Grove, the affordable housing rural exceptions scheme lies to the south and beyond this is open countryside which lies in the AONB. To the north and east lie existing residential properties located within the settlement confines.</p>				
<p>Policy Alignment SHLAA Score: 3.0 - Completely outside development envelope and no designation but impacting upon environmental constraints</p> <p>No. 1 Townsend Farm Cottages is located within the settlement confines, the paddock is not. The site lies immediately adjacent to the AONB to the south west.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>No. 1 Townsend Farm Cottages lies immediately adjacent to the Conservation Area located to the north and east. The land on the south east and south western boundaries of the paddock rises by a couple of metres, and in order to reduce the impact on the Conservation Area should remain undeveloped. A number of sites within the vicinity have been submitted (see NS01STM and NS02STM), and on balance it is considered that development of the paddock, together with both No. 1 and No. 2. Townsend Farm Cottages would give the opportunity to create a development which respects its surroundings.</p>				
<p>Landscape Impact</p> <p>The paddock contains trees that provide some screening of Ash Grove from the village and development of the paddock would lead to the spreading of a high-density development, unscreened, along the village fringe in a highly visible location with concomitant adverse impact on the AONB.</p>				
<p>Biodiversity</p> <p>Biodiversity will be limited. Bats and common reptiles may use the edges of the site.</p>				
EIA Screening		Appropriate Assessment		
<p>Green Infrastructure</p> <p>The site contributes little to GI, except in the provision of soft urban-fringe.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>Any layout to support the new dwellings will need to be to an adoptable standard. The site is within walking distance of village amenities and the bus route. The highways abutting are subject to 30mph speed limit and footways already exist in the area to link to the High Street.</p>				

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.	
Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 4.5 - Single Private Ownership	
Analysis	
The paddock provides some screening of Ash Grove, although the larger trees are within the curtilage of No. 2 Townsend Farm Cottages. Any development of the site would be in a highly visible location, and the tree screening to the south west of the paddock, adjacent to Ash Grove, would need to be retained. The impact on the nearby Conservation Area would be minimal if the development of the paddock was restricted to the flat portion of the site, and the raised area to the south east and south west remained undeveloped. Ideally any development of the site should include both No. 1 and No. 2 Townsend Farm Cottages.	
Consider for inclusion in the Submission Document?	Yes
See diagram to detail constraints/ opportunities. Will require individual policy.	

Site Code SHL073	Address Land to the south of Dover Road, St Margaret's at Cliffe	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored as site is within AONB	Area 4.82 Ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 145	
Current Use SHLAA Score: --				
Description of Site Large irregular shaped open field on the western edge of St Margarets at Cliffe. The site is located on the top of a plateau, and is significantly higher than the land and properties to the north and north east (there is a drop to Dover Road to the north). There is some scrub and hedgerow along the boundary lines, especially on the steep bank running along Dover Road and a track. There is a line of mature trees along the south east boundary line.				
Policy Alignment SHLAA Score: -- The site is outside the settlement confines.				
Physical Constraints SHLAA Score: --				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment The site is adjacent to the St Margaret's at Cliffe Conservation Area and there are Listed Buildings near to the site. The existing rural exception affordable housing (14 units) was designed to be sympathetic to the setting of the conservation area as it is screened by extensive vegetation, however, it is considered that developing the wider site will have a significant detrimental impact on the setting of the conservation area. When the rural exception affordable housing development was built on the site of a Saxon burial ground was discovered and there may be archaeological constraints that would need to be investigated if this site was to come forward for development. Likewise, the site may have some association with underground wartime structures. Landscape Impact The AONB is characterised by open rolling downland in this area. Tree cover is limited. The north west part of the site is in a highly visible area within the AONB. Any development here would be detrimental to these landscape designations and have an adverse impact on the setting of St Margaret's and the more distant West Cliffe. Additional planting for screening purposes would be contrary to the character of the AONB. The existing tree screening to the southeast of the site enabled, exceptionally, an affordable housing scheme to be built on this part of the site, but even that may be viewed as an encroachment into the sensitive landscape. Biodiversity There will undoubtedly be wildlife interest associated with the grassland and tree cover on this site, such as provision of foraging areas for bats. There may also be some potential for biodiversity enhancement, in chalk grassland creation, as the site is likely to closely overlie chalk bedrock.				
EIA Screening: S2.10 screening would be essential	Appropriate Assessment in consideration of Dover to Kingsdown Cliffs SAC required; also contribution to Thanet Coast SPA mitigation strategy.			
Green Infrastructure The site is in a visually sensitive location within an area identified for GI restoration and conservation. Development would be contrary Policy CP7.				

Proximity to Road Network SHLAA Score: --	
There are established agricultural accesses onto the site from Townsend Farm Road and Dover Road. There is only one access, off Townsend Farm Road, which would be acceptable but only for a total of fifty units (including existing properties). This would include the 14 units, granted under the rural exceptions scheme (included in the submitted site area), and the other older properties on Townsend Farm Road, leaving approximately 25 units that could be developed on the site off the existing access road. An access onto Dover Road would not be suitable due to poor sight lines.	
Access to Services SHLAA Score: --	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site occupies a prominent position adjacent to a Conservation Area and is, located within the AONB. Any development would be detrimental to these designations.	
Consider for inclusion in the Submission Document?	No

Site Code SHL043	Address Land to the rear of Reach Meadow and south of Sea Street, St Margaret's	Parish St Margaret's at Cliffe	Overall SHLAA Score 31 (11-15 Years)	Area 0.56 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site A rectangular piece of open farmland gently rising to the bungalows (Reach Meadow) to the north west. Sporadic hedgerow and a gradually diminishing bank separate the site and Sea Road along the North eastern boundary. There are no distinguishing features that delineate the south western and south eastern boundary lines.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development. Historic Environment Possible archaeological remains. Development of this site at this scale would have a detrimental impact on the setting of Curfew Cottage, Sea Street. Landscape Impact The site lies within a stretch of open land that separates St Margaret's at Cliffe. The AONB lies to the north and south of this open land. This is a very important space that separates the built form in St Margaret's and gives the settlement its unique character. Development encroaching onto this land would have a detrimental impact on the setting and longer landscape views and would be unacceptable. An appeal for local needs housing on the other side of the valley was dismissed in 2010. Biodiversity The site is bounded by a hedge on Sea Street and there is scrub to the NW, neither of which would give rise to concerns regarding development.				
EIA Screening would be required under S2.10		Appropriate Assessment: screening would be required due to proximity to Dover to Kingsdown Cliffs SAC. A contribution to the Thanet Coast SPA mitigation strategy would also be required.		
Green Infrastructure The major contribution to GI that the site provides is in the provision of a 'green' separation between settlements.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site An acceptable access could be created but change in levels would require earth movements and removal of hedgerow. There are walking and cycle connections. The wider road network could accommodate additional traffic from the development.				

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.	
Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
Development of this site would have a detrimental impact on the setting of St Margaret's and the AONB, losing the unique identity and character of this settlement. The site also lies close to a Natura 2000 site. The site performs an important function in dividing the distinct areas of St Margaret's at Cliffe and St Margaret's Bay. Any development of the site would encroach into this area to a significant degree and the urbanising effect of the development would erode the sense of separation.	
Consider for inclusion in the Submission Document?	No

Site Code STM06	Address Land to the south of Bay Hill, St Margaret's Bay	Parish St Margaret's at Cliffe	Overall SHLAA Score 29.5 (+15 Years)	Area 0.32 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site An irregular shaped piece of land fronting Bay Hill, consisting of dense woodland on a steep slope. The site is surrounded by low density residential properties. Those properties located to the north of the site are located within the settlement confines. The remainder are outside.				
Policy Alignment SHLAA Score: 3.0 – Completely outside development envelope and no designation but impacting upon environmental constraints The site is outside but adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
The site is raised approximately 5 metres from Bay Hill.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site is within the St Margaret's Bay Conservation Area. The special characteristics of this Conservation Area are the juxtaposition of the buildings, the topography together with the soft landscaping and mature treescape in this coastal location. Developing this site would inevitably lead to the removal of the trees, the loss of open space, coastal views and mature landscaping, all of which make a valuable contribution to the character of the conservation area.				
Landscape Impact The land falls away steeply towards the coast. The site is close to the AONB and Heritage Coast designations. The whole of the site is protected by an Area Tree Preservation Order although a number of the more mature trees have been affected by age and adverse weather. The site is now developing a secondary tree cover together with scrub which lends a rural character to this part of Bay Hill and maintains the contribution to the overall character of the area.				
Coastal Change The site is located in very close proximity to the South Foreland Coastal Change Management Area.				
Biodiversity The mature trees including the fallen dead trees have an intrinsic wildlife interest. The lack of management of the site has encouraged the activities of badgers and there may be setts present. There will undoubtedly be numerous locations for breeding birds within the scrub and the site itself is on chalk bedrock. The nature conservation interest of the site is such that development should be avoided.				
EIA Screening: given the housing indicated, screening would be necessary under S2.10		Appropriate Assessment: in-combination mitigation for Thanet Coast SPA would be required and screening in respect of Dover to Kingsdown Cliffs is necessary.		
Green Infrastructure The site lies next to a steep stepped footpath leading from Bay Hill to Reach Road. Development could damage the rural ambience of this path. The site provides for biodiversity, albeit limited by the tree regrowth.				

<p>Development would reduce the tree cover and impact upon the water absorptive capacity of the hillside. This could lead to surface flood concerns for existing down-slope properties.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The site does not have an existing vehicular access. An acceptable safe access could not be established due to the steep topography of the land from Bay Hill. Trees and scrub would also have to be removed.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.</p>	
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>There is no acceptable access due to the steep topography of the land from Bay Hill. Development on this site would have a detrimental impact on the Conservation Area, the designated landscape and nature conservation interest of the site.</p>	
<p>Consider for inclusion in the Submission Document?</p>	<p>No</p>

Site Code STM05	Address Tennis courts east of Seaways, St Margaret's Bay	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored due to size	Area 0.10 Ha
		Hierarchy Village		
Current Use SHLAA Score: --				
Description of Site The site comprises tennis courts located on a terrace on the steep slopes of St Margaret's Bay. The site is surrounded by other low density residential development which is located outside of the settlement confines (due to the topography). There is a steep drop to the east of the road.				
Policy Alignment SHLAA Score: -- The site is not adjacent to the settlement confines and consequently it would not be possible to easily extend the settlement confines to include this site.				
Physical Constraints SHLAA Score: -- Surrounding topography consists of steep banks.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment The site is within the St Margaret's Bay Conservation Area. The special characteristics of this Conservation Area are the juxtaposition of the buildings, the topography together with the soft landscaping and mature treescape in this coastal location. Developing this site would inevitably lead to the removal of the trees, the loss of open space, coastal views and mature landscaping, all of which make a valuable contribution to the character of the conservation area.				
Landscape Impact The site is close to AONB and Heritage Coast designations. The site is a tennis court bounded by houses in a mature treescape. The site lies in an area of decreasing density, between the two tight bends on Bay Hill and is towards the lower density end; any housing proposals should reflect that gradation. Essentially, the site may be able to accommodate one dwelling provided the mature trees are protected.				
Coastal Change The site lies in close proximity to the South Foreland Coastal Change Management Area.				
Biodiversity There are protected trees on the site boundaries because the site is located within a conservation area, and was designated as such because of the relationship between the buildings/tree'd landscape and seascape. These may provide a limited wildlife interest.				
EIA Screening: too small to require screening		Appropriate Assessment: too small to consider		
Green Infrastructure GI as a recreational resource only functions if it is attractive to users. The ambience of St Margaret's Bay is reflected in its designation as a Conservation Area. The proximity of unadopted roads, tracks and paths to this site adds to this and encourages walking. Any development should maintain such ambience (see landscape comments).				
Proximity to Road Network SHLAA Score: -- The site does not have a direct vehicular access as it is located within the southern part of the grounds of Seaways. The access to Seaways is to the north and is not in a suitable location for joint access. The site boundary does abut Bay Hill but, due to the steep bank, this would involve substantial earth movement and is too close to neighbouring properties accesses. A joint access with Carmel Cottage to the west of the site may be possible for one dwelling but this would involve the removal of protected trees and would involve third party land.				

This private access would, however, not be suitable for any further development.	
There is, therefore, no acceptable access onto the highway to this site.	
Access to Services SHLAA Score: --	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal. This site is located close to the Bay area which is slightly divorced from these facilities.	
Market Attractiveness SHLAA Score:	
Ownership SHLAA Score:	
Analysis	
The site has no acceptable access and is within a sensitive area in terms of landscape and Conservation Area. There is an overriding objection from a highways perspective to development on this site.	
Consider for inclusion in the Submission Document?	No

Site Code STM08	Address Land to the south west of Casa Marina, Beach Road, St Margaret's Bay	Parish St Margaret's at Cliffe	Overall SHLAA Score Not scored due to size and in AONB	Area 0.15 Ha
		Hierarchy Village		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Triangular site located near to the coast in the southern extremities of St Margarets Bay. The site is currently within the grounds of the existing property being partly used as a garden with the remainder as managed woodland/scrub. The site is approximately one metre above the road and rises to the east. The road is also private and poorly maintained. To the west, on the opposite side of the road, are the gardens of Pines Calyx. To the north lie residential properties located outside of the settlement confines.</p>				
<p>Policy Alignment SHLAA Score: --</p> <p>The site lies some distance from the settlement confines and therefore could not be easily extended to include this site.</p>				
<p>Physical Constraints SHLAA Score: --</p> <p>The site rises to the east.</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The site is within the St Margaret's Bay Conservation Area, the AONB, abutting the SAC and has a large number of mature trees. The special characteristics of this Conservation Area are the juxtaposition of the buildings, the topography together with the soft landscaping and mature treescape in this coastal location. Developing this site would inevitably lead to the removal of the trees, the loss of open space and mature landscaping, all of which make a valuable contribution to the character of the conservation area.</p>				
<p>Landscape Impact</p> <p>The site is on the south east of the South Foreland Valley. This site faces north west and overlooks the Pines Gardens. It is the last property on Beach Road on the edge of the open countryside. It is within the AONB and Heritage Coast landscape designations. Adjacent to it is the South Foreland Valley section of the Dover to Kingsdown cliffs SAC and SSSI which is also open access countryside. Notwithstanding the loss of mature treescape, which would have an adverse impact on the village, any development in this highly sensitive area would have an adverse impact on the designated landscape.</p>				
<p>Coastal Change</p> <p>The site lies outside, but immediately adjacent to, the South Foreland Coastal Change Management Area.</p>				
<p>Biodiversity</p> <p>The site includes a number of mature trees, which are protected by virtue of the Conservation Area. In this locality the trees may provide important habitat, nesting sites and refugia for birds and bats. The site is on chalk bedrock and directly adjacent to a habitat of European importance. Any change to this site should address this particular interest and seek biodiversity enhancement.</p>				
EIA Screening: S2.10 required due to location in a sensitive area.			Appropriate Assessment: Essential in respect of Dover to Kingsdown Cliffs SAC.	

Green Infrastructure	
The route along Beach Road into the openness of the South Foreland Valley is a significant element in the sense of transition from urban form to 'wild' countryside, the valley being open access land and forming one of the district's most important pieces of GI. Footpath ER38 runs along two boundaries of the site and the Saxon Shore Way diverts along this. Development would adversely affect the ambience of the area diminishing its great importance for GI.	
Proximity to Road Network SHLAA Score: --	
The site does not have an established access but is within the property boundary of Casa Marina. A new access would be onto an unadopted road, which is in very poor condition. A limited development of one property would be acceptable subject to improving sight lines by removing trees and vegetation – see topography/landscape comments.	
Access to Services SHLAA Score: --	
The site is divorced from the main settlement, although a bus stop would be within a five minute walk.	
Market Attractiveness SHLAA Score:	
Ownership SHLAA Score:	
Analysis	
The site is in a very sensitive area on the edge of the open countryside and falls within AONB, Heritage Coast and Conservation Area. Mature trees occupy half of the site which would limit any development and make access to the site problematic. The site is in a very sensitive location in respect of biodiversity enhancement. In view of this it is considered that development would not be acceptable.	
Consider for inclusion in the Submission Document?	No

Site Code SAD28	Address Land located between Salisbury Road and The Droveaway	Parish St Margaret's at Cliffe	Overall SHLAA Score Not Scored due to being in AONB	Area 2.61
Hierarchy Village				
Current Use SHLAA Score: --				
Description of Site A large irregular shaped piece of land located on the top of a plateau. The site is flat but is higher than properties on The Droveaway on the western boundary (there is a bank between the site and road). The site is screened along the western and southern boundary by dense trees and scrub. There is a small wood of mature trees on the south eastern corner of the site. A public footpath runs along the southern boundary. The site has residential development on the western, southern and eastern boundaries. There are open fields to the north.				
Policy Alignment SHLAA Score: --				
The site is outside, but adjacent to, the settlement confines. The site is also within the AONB.				
Physical Constraints SHLAA Score: --				
The site is flat but there are banks along the western boundary.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact The site lies within the AONB and close to the Heritage Coast. It abuts National Trust land to the NE. The site is on a crest of a hill and, despite the screening, would be visible from a long distance. (Redevelopment of a house adjacent to this, but lower, on The Droveaway had to undergo numerous changes before it was considered acceptable.) Any development on the site would, therefore, have a highly detrimental impact on the designated landscape.				
Biodiversity The site is identified as chalk grassland to the NE (STM09), which is a priority habitat under the Natural Environment and Rural Communities Act, 2006 and is a material consideration under PPS 9. That section of the site is not amenable to development. Apart from a small area of scrub to the SW, the rest of the site is arable with some hedging along boundaries. The arable land is chalk-based and maybe amenable to reversion to chalk grassland with appropriate management. The site could provide foraging and flight lines for bats.				
EIA Screening: Essential due to sensitive location	Appropriate Assessment: The site is within 300m of the Dover to Kingsdown Cliff SAC and screening would be necessary. There would also be a requirement to contribute to the Thanet Coast Mitigation strategy.			
Green Infrastructure The site is bounded by footpath ER26 along the SW, the vehicular cul-de-sacs of The Droveaway to the NW, Salisbury Road to the SE and by National Trust land to the NE, providing a wide range of recreational walking opportunities, together with the biodiversity associated with chalk grassland and its associated hedges and scrub. The ambience of the area is demonstrated by the numbers of visitors to the coastal area and the levels of usage of paths, both public and permissive. The site is within the 'restore and conserve' area of the GI network, reflecting the real opportunities for GI. Development would harm the existing GI and the opportunities for enhancement.				

Proximity to Road Network SHLAA Score:--	
The two roads that lead to the site appear to be unadopted and not well maintained. There is no access onto the site. The site is located in the area between Salisbury Road and The Droveaway. Salisbury Road is a single track unadopted road and there are no footways along its length. The Droveaway is also a single track road but is adopted. However, the road already serves a large number of dwellings and there are no footways beyond the junction with Salisbury Road. Pedestrian access to services including the local bus stop is therefore poor and reliance on the car is likely to be high as a consequence.	
Access to Services SHLAA Score: --	
St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal. However this site is located on the edge of the Bay area, and as a consequence the majority of the services and facilities would be over a ten minute walk.	
Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
The site is located in the AONB in a highly visible location at the top of a hill on a plateau. Any development would have a detrimental impact on this designation. Access to the site is unsuitable on unadopted roads.	
Consider for inclusion in the Submission Document?	No

Site Code STM09	Address Land to the north of Salisbury Road, St Margaret's Bay	Parish St Margaret's at Cliffe	Overall SHLAA Score Site not scored as within AONB	Area 0.30 Ha
		Hierarchy Village		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>An irregular shaped site located on a crest of a hill (land adjacent slightly higher) consisting of open paddocks with small livestock sheds located in the north eastern corner. Some small (1m high) conifers being grown on north eastern corner by the main access onto the site. The road leading to the site appears to be unadopted and not well maintained. There are open fields to the north, north east, west and southwest of the site. There are residential properties opposite the frontage of the site on the south eastern boundary. A larger site, which also includes this land was submitted at the Preferred Options stage (ref: SAD28)</p>				
<p>Policy Alignment SHLAA Score: --</p> <p>The site is adjacent to the settlement confines, located within the AONB and Heritage Coast.</p>				
<p>Physical Constraints SHLAA Score: --</p> <p>The site has a slight incline.</p> <p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>No considerations</p> <p>Landscape Impact</p> <p>The site lies within the AONB and Heritage Coast. The site is on a crest of a hill and would be visible from a long distance. Any development on the site would, therefore, have a highly detrimental impact on the designated landscape.</p> <p>Biodiversity</p> <p>The site is unmanaged chalk grassland, a UKBAP priority habitat. Development would be contrary to PPS9.</p>				
EIA Screening: necessary due to being in the AONB		Appropriate Assessment: would require screening due to close proximity to Dover to Kingsdown Cliffs SAC		
<p>Green Infrastructure</p> <p>The site is adjacent to National Trust land which is well-used for recreational walking. It is also chalk grassland within the AONB. In the Core Strategy, this area is highlighted being for restoration and conservation. Development here would be unacceptable as it would run counter to the policy aspirations within the Core Strategy.</p>				
<p>Proximity to Road Network SHLAA Score: --</p> <p>The site is located at the end of Salisbury Avenue which is a single track unadopted road. There is poor pedestrian safeguarding; the footway stops at the junction between Salisbury Road and the Droeway and there is no provision along the length of Salisbury Road. Pedestrian access to services including the local bus stop is therefore poor and reliance on the car is likely to be high as a consequence.</p>				
Access to Services SHLAA Score: --				

St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is located in a highly visible location within the AONB and Heritage Coast so any development would be detrimental to these landscape designations. Development would also be contrary to PPS9 as the site is unmanaged chalk grassland, a UKBAP priority habitat.

Consider for inclusion in the Submission Document?

No

Site Code SAD27	Address Land to the south west of St. Margaret's Country Club, Reach Road	Parish St. Margaret's	Overall SHLAA Score = Not scored as located within the AONB	Area 1.3 ha
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>The site has been submitted for an extension to the existing and established Park. The proposal seeks an increase of approximately 19 holiday caravans. There are currently 210 static caravans, 120 chalets and 23 hotel bedrooms already permitted at the Park. The existing Park is located outside, but adjacent to, the settlement confines. The site lies to the west of the existing Park. The boundary to the AONB forms the site's eastern boundary with the existing park located outside of the AONB. The site fronts Reach Road to the south with open countryside beyond this and to the north and west.</p>				
Policy Alignment SHLAA Score: --				
<p>The site lies outside the settlement confines and within the AONB. It is also considered that Saved Local Plan policy LE30 would apply.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1 which would be appropriate for residential development.</p> <p>Landscape Impact</p> <p>The local landscape character is of large open fields in a predominantly flat landscape with a gentle dip of a dry valley head to the southeast towards Reach Court Farm. Hedgerows are few and the predominant woody vegetation is that associated with WW2 relics. The site lies within the AONB and has a relatively young hedgerow to the southwest that partially screens the country club buildings. There is currently a minor adverse impact on the setting of the AONB. The incursion into the AONB is also recent and this site has, in the past, benefited from a woodland grant scheme for planting to screen the country club from the southwest as development was considered unacceptable.</p> <p>Although the existing hedgerow now provides some softening, the site remains within the AONB and the earlier identified purpose of the land for screening the country club remains.</p> <p>Biodiversity</p> <p>The site is likely to have acquired some common reptile interest since its conversion from arable field to amenity grassland and a survey would be required.</p>				
EIA Screening: no		Appropriate Assessment: no		
<p>Green Infrastructure</p> <p>The site is a private tourist facility and intended to remain so; therefore GI is insignificant.</p>				
<p>Proximity to Road Network SHLAA Score: --</p> <p>The site has been submitted as an extension to the holiday park and therefore access to this site is intended via the established access on Reach Road. The existing access arrangements can absorb the additional traffic associated with 19 static caravans. There are no recorded crashes in the area that would suggest any problems surrounding the use of the existing access and the land use is unlikely to impact on peak time traffic. A footpath connection should be provided to join up with the existing footpath leading to the village which commences at Langdon Close.</p> <p>If provided, even if only from the existing gap in the hedge, the footway must be part of a Section 278 Agreement for works carried out within the existing highway and must include pram crossings and tactile paving at the junction of Langdon Close (both sides of the bellmouth).</p>				
Access to Services SHLAA Score: --				

St. Margaret's is a large village, offering not only a Primary School and GP surgery, but also a number of public houses and tea rooms, village shop, village hall and a Country Club. There are a number of bus stops which provide services to both Dover and Deal.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site lies within the AONB; the hedgerow to the south west partially screens the country club from the wider landscape. Any development of this site would result in incremental harm to the AONB and harm to the AONB over long distance views. Saved policy LE30 of the Dover District Local Plan permits major extensions to camping, static or touring sites only if (among other considerations) they are not located within the AONB or on the Heritage or undeveloped coast; and they include a comprehensive landscaping scheme. It is considered, that as a result of the sensitive location any development of this site would constitute a 'major extension'.

Government Guidance identifies that AONB's have the highest status of protection in relation to landscape and scenic beauty. The conservation of the natural beauty of the landscape and countryside will be given great weight in any decision. The economic benefits of the proposal have also to be weighed against the harm.

In conclusion, it is considered that an extension to the country club would have an adverse affect on the character or appearance of the designated countryside. Whilst it is expected that there would be some benefit to the local economy, it is not considered there is sufficient justification relating to the need for additional accommodation on this particularly sensitive site, which could not be provided by replacements or the upgrading of existing static caravans.

Consider for inclusion in the Submission Document?

No

West Hougham

Site Code HOU01	Address Land to the north east of Broadsole Lane and to the rear of Jubilee Cottage, The Street, West Hougham.	Parish Hougham Without	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 1.13 Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 33
Current Use SHLAA Score:				
Description of Site Part of the site is an operational commercial use, and the remainder is grassland. Broadsole Lane is a narrow rural road, and the site's boundary to this is via a drop down a bank (approximately one metre high). To the east and south lies existing residential development, to the north Broadsole Farm and immediately to the west Broadsole Pond.				
Policy Alignment SHLAA Score: The site is located outside, but immediately adjacent to the confines.				
Physical Constraints SHLAA Score: The entire site is located within the AONB. The removal of the bank and hedgerow along Broadsole Lane (to gain access) would have a detrimental impact on the character of the area.				
Flood Risk The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment No considerations				
Landscape Impact Part of the site is used for commercial purposes. The site lies within the AONB and any further development would have a detrimental impact on the local character and AONB. Intensification of development in this location would lead to a loss of soft edge to the village, and should be strongly resisted.				
Biodiversity The site lies close to a pond. Guidance on Great Crested Newts indicates that there would need to be a search zone of 200m radius from the pond for any development. Part of the site is pasture with mature trees and there will be a degree of biodiversity interest associated with these features.				
EIA Screening: necessary due to location		Appropriate Assessment: too small		
Green Infrastructure PRoW footpath ER193 crosses the western part of the site, but appears little used. The site is within the AONB and thus protected under policy CP7. Development of this site would have an adverse impact on GI.				
Proximity to Road Network SHLAA Score:				

Access from Broadsole Lane to serve up to five units would only be possible if the hedge and bank were removed to increase visibility splays. The Street (between No 3 & 5) is not likely to be suitable to serve any further development.

Given the desire to retain both the bank and the hedgerow gaining access to the site would be problematic.

Access to Services SHLAA Score:

West Hougham is designated as a village in Policy CP1 of the adopted Core Strategy. A bus stop is located within a five minute walk of the site. In addition there is a village hall.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Whilst part of the site has already been developed for commercial purposes this is in a discrete part of the site. Any intensification of development on this site would adversely affect the character of the village edge and have a detrimental impact on the AONB.

Recommend for inclusion in the Submission Document?

No

Site Code NS01HOU	Address Land to the north of Lady Garne Road, West Hougham	Parish Hougham Without	Overall SHLAA Score Not considered in the SHLAA as the site is located within the AONB	Area 9.67 ha
		Hierarchy Village	Indicative No. of units @ 30 dph = 290	
Current Use SHLAA Score:				
Description of Site Part of the site is situated on a higher level than the road. The site slopes downwards to the north and approximately half of the site (closest to the settlement) occupies a visually prominent location. To the south lies existing residential development, to the west Broadsole Farm, and to the north and east is open countryside. The land to the east has been submitted for consideration (reference SAD29).				
Policy Alignment SHLAA Score:				
The site is located outside, but adjacent to, the settlement confines. The site is located within the AONB.				
Physical Constraints SHLAA Score:				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Historic Environment				
No considerations				
Landscape Impact				
Although screened by hedgerow, the topography of the site is such that development would be prominent and would have a detrimental impact on the landscape. The site is entirely within the AONB and the size of development would be contrary to PPS7. Development would require a considerable loss of screening vegetation and this would increase the adverse visual impact of the site and result in an inappropriate change in the character of the village edge.				
Biodiversity				
The site is an arable field, screened from the lane to the N and E by hedgerow and any biodiversity interest will be restricted to the boundary. The hedgerow may be 'important' within the meaning of the Hedgerow Regulations 1997 and much would have to be lost for vision splays.				
EIA Screening: necessary due to location.		Appropriate Assessment: there would have to be a contribution to the Thanet Coast SPA mitigation strategy and impacts on Folkestone to Etchinghill Escarpment SAC would also need to be considered, as a minimum.		
Green Infrastructure				
The site is crossed by two PRoW, ER193 (well-used) to the NW and ER194 (little-used) to the NE. These footpaths form part of a wider network for the area. The site would have to employ SUDs to avoid increased risk of surface water flooding of the boundary lane.				
Proximity to Road Network SHLAA Score:				
The site is fronted by Lowslip Hill and Broadsole Lane. Both carriageways are single track with passing places, of poor alignment and poor forward visibility. The junctions with The Street are				

substandard and the speed limit is 60mph in the vicinity of the site.

It is unlikely that sight lines would be achieved. Public rights of way cross the site which would need to be retained on their existing line or otherwise diverted. There are no footways to connect to the village and whilst a bus service exists on The Street, village amenities are limited. The site is considered unsustainable in highway terms.

Access to Services SHLAA Score:

Hougham has a limited number of services. There is not a school, shop, or public house, but there is a Village Hall and a bus service.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Development at the scale envisaged would significantly alter the character of the existing settlement and have a detrimental impact on the landscape, which is protected as AONB. In addition, the site is considered unsustainable in highway terms. A smaller area would also be unsuitable for development given the slope of the land. Any smaller portion of the site would also be unsuitable for development since it would have no natural boundaries thus increasing the impact that any development would have on the landscape.

Consider for inclusion in the Submission Document?

No

Site Code SAD29	Address Land at West Hougham (north of Apsley House and Flint Cottages)	Parish Hougham Without	Overall SHLAA Score Not scored as located within the AONB	Area 1.81 ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 53
Current Use SHLAA Score:				
Description of Site				
<p>The site is currently in use as a private waste tipping site, although at the time of visiting it was not in use and it was unclear as to when it was last operational. The site is currently accessed via a single track road from a bend on Broadsole Lane, and enters the site at a midpoint on its northern boundary. To the north of the site there is a steel framed building, with corrugated iron roof, (perhaps a former agricultural building) and containers. The area covered by the waste operations is limited to approximately half of the northern portion of the site. The remainder of the site is partly covered with woodland, part grass and scrub. The western boundary with Broadsole Lane has a thick woodland belt. Beyond the site to the north, and to the east and west lie open fields. To the south lies a number of properties located in West Hougham, although these are outside of the settlement confines.</p>				
Policy Alignment SHLAA Score:				
The site lies outside of the settlement confines and within the AONB.				
Physical Constraints SHLAA Score:				
Flood Risk				
The site is located within Flood Zone 1 which would be appropriate for residential development.				
Part of the site is covered with mature trees. There may be contamination issues associated with its current use.				
Historic Environment				
No considerations				
Landscape Impact				
Although part of the site appears to be in current use as a private waste tipping site, and as such this portion would be considered as brownfield, the site occupies a very sensitive location. The site lies within the AONB, and any development would conflict with PPS7. The visual impact of the site would be adverse, with long distance views. It would introduce an urban character to the edge of the village which would be highly anomalous.				
Biodiversity				
The site could not be fully accessed. Google Earth (2007, accessed 2011) imagery indicates a complexity of habitats that would require full ecological survey. The site may provide foraging for bats and common reptiles are likely to be present. It is improbable that development would enhance biodiversity.				
EIA Screening: necessary due to location		Appropriate Assessment: there would have to be a contribution to the Thanet Coast SPA mitigation strategy and impacts on Folkestone to Etchinghill Escarpment SAC would also need to be considered, as a minimum.		
Green Infrastructure				
To the north of the site Public Bridleway ER217 runs E-W connecting to a network of bridleways and footpaths. Public Bridleway ER219 runs close to the south of the site and if connection could be made				

across third party land, an enhancement in recreational riding and walking could be achieved.

It is, however, unlikely that biodiversity enhancements are possible and the adverse impact on the AONB conflicts with Policy CP7. The site is unsuitable for development.

Proximity to Road Network SHLAA Score:

The site would front a derestricted carriageway (Broadsole Lane) which is extremely narrow and only allowing access for single lane traffic. Whilst the road could be widened fronting the site it would then create pinch points at either end which would require third party land take to extend the widening. Broadsole Lane, at this location, is not suitable for additional traffic in its current form nor with partial widening. There are no footways linking to local facilities and no room to accommodate them. Broadsole Lane is currently 6'6" restricted. A mix of pedestrian and vehicle traffic on Broadsole Lane in this location is likely to increase the risk of crashes. Sight lines of 160m x 4.5m x 160m would be required in this location and are unlikely to be achievable.

Access to Services SHLAA Score:

Hougham has a limited number of services. There is not a school, shop, or public house, but there is a Village Hall and a bus service.

Market Attractiveness SHLAA Score:

Ownership SHLAA Score:

Analysis

Development at the scale envisaged would significantly alter the character of the existing settlement and have a detrimental impact on the landscape, which is protected as AONB.

Consider for inclusion in the Submission Document?

No

Ash

Site Code	Address	Parish	Overall SHLAA Score	Area
SHL014	Land between A257 Ash Bypass and Old Sandwich Road, Guilton Farm	Ash	33.50 (6-10 years)	1.1Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 33
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site consisting of open farmland located at the western extremity of Ash at the junction of Old Sandwich Road and the A257 (a Primary road). The two roads form the south western and northern boundaries respectively. There are sporadic hedgerows and trees along the boundary line. The land falls gently to the south east. The surrounding area is predominantly open fields but there is a storage yard adjacent to the site on the south eastern boundary, a residential property and farmers yard to the south and an orchard to the west of the site (on the opposite side of the junction).</p> <p>The location of the site is disconnected from the rest of the village.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The site is divorced from the settlement, the nearest point of the site being located 280m away from the village confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
The site is located within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment				
There are no Listed Buildings or Conservation Areas within the site. The site is, however, only 160m to the west of the Guilton Ash Conservation Area and Listed Buildings and development would have a detrimental impact on the setting of these. The site contributes to the open character of the village edge and it is the loss of this openness that would have a detrimental impact on the Guilton Conservation Area.				
The site is also higher than the Conservation Area and any development, especially at the assumed densities, would be overpowering. Development would, therefore, have a detrimental impact on the setting of this Conservation Area.				
Landscape Impact				
The site is close to the high point on the ridge between Shatterling and Ash, and is highly sensitive in a landscape that, apart from the A257, is in reasonably good condition. Any development would have severely adverse impact on this landscape.				
Biodiversity				
The site is arable farmland. It is bounded by a hedged trackway to the north and sporadic trees around the other boundaries with a wide verge to the A257. The limited biodiversity will be associated with the perimeter.				
EIA Screening: large enough to be required.			Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently	

	provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.
<p>Green Infrastructure</p> <p>The site is physically isolated from the settlement and has no PRowS. Biodiversity would be limited. Development could not provide any significant GI. Therefore, the site is GI neutral</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access would be suitable from Guilton Lane but not from the A257 (a Primary Road). The access would need 160m sight lines as the road is derestricted. Removal of trees along this road may need to be required to make this possible.</p> <p>There is a pathway on Guilton Lane but this is not continuous to the local facilities in the village. There are none on the A257. Neither have cycle ways. Development would be extremely close to the primary road and this could result in more people walking in this location and this should not be encouraged. As the site is adjacent to a primary road, there could be issues relating to road noise and pollution.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>There are two Primary Schools located within ten minutes walk of the site, St. Faiths at Ash (independent) and Cartwright and Kelsey C of E school. As noted above, the footpath to the schools is, however, not continuous. There are bus stops for two services (13 & 14) which run hourly to Canterbury, Sandwich and Deal and pass through the main centre of Ash (which has a range of shops, pubs and a Doctors surgery), within five minutes walk of the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The positive aspects of the site are that the site is within five minutes walk of a bus stop, outside Flood Zones 2 and 3 and a suitable vehicular access could be established.</p> <p>The site is, however, divorced from the village and development would have a detrimental impact on a highly sensitive landscape and on the setting of the neighbouring Conservation Area and Listed Buildings. There is also concern that development could lead to more pedestrian movements along a Primary road, the A257. These issues would outweigh the positive aspect of the site.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL004	Address Land between No 3 and Arden Cottage, Guilton	Parish Ash	Overall SHLAA Score 33.5 (6-10 years)	Area 0.42 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 12
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular shaped site consisting of open grassland with residential properties to the east and west, and agricultural fields to the north of the site. Guilton Rd runs along the southern boundary. The land gently rises to the northern boundary from the road, where there are recently planted trees. Telegraph lines run along the southern boundary line.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The eastern boundary of the site abuts the Settlement Confine.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site falls within Flood Zone 1 and would, therefore, be appropriate for residential development.				
Historic Environment The site falls within the Guilton Conservation Area and there are six Listed Buildings on the opposite side of the road. There are no Listed Buildings within the site. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space that makes a valuable contribution to the special character of Guilton. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.				
Landscape Impact The landscape is considered to be in a good condition. This is a sensitive location on the edge of the village and the introduction of development would introduce hard urban edges with coalescence of built form and related paraphernalia into the edge of a rural settlement, where the spaces between buildings would normally be increasing.				
Biodiversity The site is improved grassland which might provide some foraging ground for small mammals and common reptiles. Development would have an insignificant impact.				
EIA Screening: too small to be considered			Appropriate Assessment: too small to be needed.	
Green Infrastructure Along the other side of the northern boundary runs PRow EE123A which connects to the network of footpaths to the west of Ash. This network appears reasonably well used. Development, which would have to be sensitive to this footpath, could enable a linkage to be created to Guilton, although given the general layout of local footpaths, this is probably superfluous.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

An acceptable access to the site could only be achieved at the western end of the site due to the curvature of the road and the existing junction layout. The wider road network could accommodate the additional traffic from development of this size. The site is also opposite a bus stop which would enable an alternative mode of transport to the car. A pathway runs along the southern edge of the site but this is not continuous to the centre of the village.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

There are bus stops adjacent to the site for two services (13 & 14), which run hourly to Canterbury and Sandwich and pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). There are two Primary Schools located within five to ten minutes walk of the site, St. Faiths at Ash and Cartwright and Kelsey C of E school. As noted above, the footpath to the schools is, however, not continuous.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although a suitable access to the site would be achievable and the site has scored well in the SHLAA due to the access to services, market attractiveness and single ownership, it is considered that the introduction of residential development in this location would have a detrimental impact on the setting of the Conservation Area, Listed Building and on the longer views of the village. These detrimental impacts would outweigh the positive aspects of the site.

Consideration for inclusion in the Submission Document?

No

Site Code ASH05	Address Land between Morella Villa & Glyndale, Durlock Road, Guilton.	Parish Ash	Overall SHLAA Score Not scored to small.	Area 0.15 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: --				
Description of Site Rectangular shaped site consisting of open farmland gently falling to the south east. There is a hedgerow along the boundary with Durlock Road to the north west and on the boundary with the neighbouring residential property to the north east. To the south west there is a nursery but there is no identifiable boundary to the south east.				
Policy Alignment SHLAA Score: -- The site is located approximately 150m away from the village confine.				
Physical Constraints SHLAA Score: -- Flood Risk The site is located within Flood Zone 1 and would be suitable for residential development. Historic Environment The site lies adjacent to the Guilton Conservation Area and acts as a break between the edge of Guilton and the horticultural developments to the south west and is, as such, important to the setting of the Conservation Area. The hedge, which runs almost the length of the site, would also have to be removed for highway improvements. This would change the character of the rural lane to its detriment. Landscape Impact The site is located close to the crest of a hill and, when viewed from the south, any new development would have a detrimental visual impact on the wider countryside. Biodiversity The roadside hedgerow is not native and the land arable, thus there is no significant site biodiversity to consider.				
EIA Screening: too small to be considered			Appropriate Assessment: too small to be considered	
Green Infrastructure There are no existing GI attributes and development could not provide any of significance.				
Proximity to Road Network SHLAA Score: -- A suitable access could be created for small scale development (less than five units) but the frontage hedge would have to be removed to achieve the necessary visibility splays. There is no continuous footway to the village centre, which is not desirable from a pedestrian safety perspective.				
Access to Services SHLAA Score: -- There are bus stops approximately 120m from the site for two services (13 & 14) which run hourly to Canterbury and Sandwich and pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). There are two Primary Schools (St. Faiths at Ash (independent) and Cartwright and Kelsey C of E school) located within five to ten minutes walk of the site. As noted above, the footpath is not continuous and pedestrians would have to walk in the road for small stretches.				
Market Attractiveness SHLAA Score: --				

Ownership SHLAA Score: --

Analysis

Although the site is outside Flood Zones 2 and 3 and would therefore be appropriate for residential development in terms of flood risk, development of the site would have a detrimental impact on the Gilton Conservation Area and the setting of the wider landscape. The site acts as a break between the edge of Gilton and the horticultural developments to the south west and is, as such, important to the setting of the Conservation Area. The site is also located near the crest of a hill and, when viewed from the south, any new development would have a detrimental visual impact on the countryside.

Consideration for inclusion in the Submission Document?

No

Site Code SHL002 (SHL002V)	Address Land at GUILTON Farm	Parish Ash	Overall SHLAA Score 40.00 (0-5 years)	Area 0.33Ha (0.66Ha)
		Hierarchy Local Centre		
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
Description of Site <p>Former farm yard fronting GUILTON Rd that has been requested to be included within the settlement confines. The farm buildings fronting GUILTON Rd within the site have had planning permission for conversion to business uses and residential. The farm house (not within the site boundary) is Listed and the site falls within the Conservation Area. The land is located on the crest of the hill but the site itself is reasonably flat.</p> <p>The site has residential properties to the north (on the opposite side of the road), east and west. There is agricultural land to the south.</p> <p>A recent planning application (DO/10/00351) for conversion the 'Old Stables' (on the northern boundary with the road) has recently been granted (through Core Strategy Policy DM4, the re-use or conversion of rural buildings) and this would supersede SHL002 (as they are the same location). SHL002V is a variation of the original site and includes additional land to the south.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is adjacent to the village confines, which lie to the east.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk The site is located within Flood Zone 1 and would be appropriate for residential development.				
Historic Environment <p>GUILTON Farm and the neighbouring row of terraced housing to the west are Listed Buildings. The site also falls within the Conservation Area. Further development of the site would have a detrimental effect on the setting of the Listed Building and the integrity of the Conservation Area. The introduction of new dwellings in (SHL002v) would divorce the farm and the outbuildings from the countryside to the south and as such would detract from the setting of the Listed Farm House, outbuildings and Conservation in which it is located.</p> <p>The site was considered at the 2001 Local Plan Inquiry where the Planning Inspector agreed with the District Council's assessment that there is a high ratio of open space to built form, giving a soft, loose knit appearance to the area and that the then proposed housing development would not preserve or enhance the character of the conservation area or the setting of the Listed Building.</p> <p>There is also a Scheduled Monument to the south east of the site, but this is approximately 200metres away and development would not have a detrimental impact on this.</p> Landscape Impact The site is on the crest of a ridge and is visible when viewed from the south. Development of the site, especially to the rear, would have a detrimental impact on the wider landscape.				
Biodiversity There would be a possibility of bats and Barn Owls in the existing barns. The site could also support species such as common reptiles. Biodiversity surveys would be required as part of any development proposal.				

EIA Screening: too small to be considered	Appropriate Assessment: too small to be considered
<p>Green Infrastructure</p> <p>The site does not currently contribute significantly to GI and development is unlikely to change this.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Sight lines are not acceptable from the site due to existing walls and built form. There are footpaths to the centre of the village but these are not continuous.</p> <p>A recent planning application (DO/10/00351) for conversion the ‘Old Stables’ to two dwellings, indicated access from at the rear, utilising the existing farm access that runs behind Guilton Farm and joins Guilton Road adjacent to Bluebell Lodge to the east. This has been granted planning permission.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>There are bus stops adjacent to the site for two services (13 & 14) which run hourly to Canterbury, Deal and Sandwich and they also pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery).</p> <p>There are two Primary Schools located within five to ten minutes walk of the site, St. Faiths at Ash (independent) and Cartwright and Kelsey C of E school. The footway, however, is not continuous and pedestrians would have to walk in the road.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The request was to have the site included within the settlement confines. To some extent the northern part of the site does not have to be considered as it has had a recent planning approval for conversion to residential (through Policy DM4). If the confines were to be changed this would enable additional development in the southern part of the site.</p> <p>The positive aspects for development of the site include access to bus services and that the site is outside the flood risk zones. Development of the site would, however, have a detrimental impact on the setting of the Conservation Area, the neighbouring Listed Buildings and on the wider landscape. It is considered that the additional development (which would be allowed if the confines were changed) would, therefore, be unacceptable.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL081	Address Land at Molland Lane	Parish Ash	Overall SHLAA Score 35.00 (6-10 Years)	Area 1.56 Ha Indicative No. of units @ 30 dph = 46
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site Triangular shaped piece of farmland located on the edge of the village. The land is slightly domed in its topography and is raised approximately 3 metres above Gilton Lane on the south eastern boundary, and Molland Lane on the north eastern boundary. The boundary line with the two roads consists of a steep bank with trees and hedgerows. Molland Lane only reaches the level of the site at Molland Cottage at the northern corner of the site. There are also power lines and a Public Right of Way on the western boundary.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The settlement confine falls on the opposite side of the Gilton Road and Molland Lane. So whilst the site does not abut the confine line, the site is separated by the width of the road.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk The site lies within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment There are no Listed Buildings or Conservation Area within the site. The site is, however, only approximately 40m away from the Gilton Ash Conservation Area (to the west) and 60m from the Ash Conservation Area to the east. The site is also approximately 100m north of an Ancient Monument.</p> <p>Development of the site would have a detrimental impact on the rural character of the Conservation Area through the loss of open space which makes a valuable contribution to the special character of Ash and the two Conservation Areas. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.</p> <p>If the site was to be developed there could be significant earthworks to cut back the embankment to enable access. This was an issue considered at the Local Plan Inquiry in February 2001 and the Planning Inspector concluded that such engineering works would be damaging to the rural character of the Lane and would have an effect on The Street Conservation Area.</p> <p>Landscape Impact As the site is higher than the road level, it is not currently visible from Gilton Road or Molland Lane. The site would be visible, however, from the first floor level of neighbouring properties. As the site is domed, any development would be highly visible in the wider landscape.</p> <p>The Local Plan Planning Inspector concluded that development on this site would either be an unacceptable visual impact or it would be found necessary to so conceal the development by structural planting that the character of the area would be harmed.</p> <p>Biodiversity The site is arable with few marginal features. There will be some biodiversity associated with the Molland Lane scrub-covered embankment.</p>				

<p>EIA Screening: the site is large enough to requires screening</p>	<p>Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.</p>
<p>Green Infrastructure</p> <p>The site is of such a size that surface water management would be required. Being raised above Guilton, such management may be complex to avoid re-emergence.</p> <p>The site is bounded to the N and W by PRoW, footpaths EE120 and 123B, respectively. These appear well used and connect to a wider network of footpaths to the W of Ash. Careful design could utilise these features and provide GI enhancement which could also provide biodiversity enhancement. Given the concerns regarding European sites (Appropriate Assessment) above, such GI enhancement may be essential, decreasing the land available for housing.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Visibility is currently poor and there is no footpath. An access could be achieved onto Molland Drive but this would require major earth movements to provide adequate visibility. Such work would, however, have a detrimental impact on the rural character of the village.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>There are bus stops adjacent to the site for two services (13 & 14) which run hourly to Canterbury, Sandwich and Deal and also pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). There are two Primary Schools (St. Faiths at Ash and Cartwright and Kelsey C of E school) located within five minutes walk of the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is close to local services and is outside the Flood Zone 2 and 3, is not considered suitable due to the detrimental impact development would have on the wider landscape and on the setting of two Conservation Areas. The access would require major earth movement and this would also have a detrimental impact on the character of the area, introducing hard urban form (footpaths, street lighting and the junction itself) into a rural lane on the edge of the village.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SAD24	Address Former Council Yard, Molland Lea	Parish Ash	Overall SHLAA Score Not scored, too small	Area 0.15Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: --				
Description of Site Rectangular site located on the northern edge of Ash. The site is flat and consists of a scout hut along the western boundary, garages and concrete hard standing. The site lies within a residential area with only the northern boundary abutting agricultural land (site SHL026). The site is used as an access to the rear of properties on Holness Road (No's 12 to 20) and Chequer Lane (No's 58 to 66).				
Policy Alignment SHLAA Score: -- The site is within the Settlement Confines.				
Physical Constraints SHLAA Score: --				
Flood Risk The site is located in Flood Zone1, which would be appropriate for residential development.				
Historic Environment There are no Listed Buildings or Conservation Areas located within or adjacent to this site.				
Landscape Impact The site is well contained within an urban area. There would be no detrimental impact on the wider landscape if this site was developed.				
Biodiversity Any biodiversity interest would be insignificant.				
EIA Screening: too small to consider.			Appropriate Assessment: too small to consider.	
Green Infrastructure The site is bounded by two PRoW's, footpath EE112 to the N and EE113 to the E. These are well-used locally. Development should not adversely affect these.				
Proximity to Road Network SHLAA Score: -- The site has an existing access onto Molland Drive. This site could accommodate up to 5 units served off the existing private drive. Bin storage would need to be provided within a 25m carry distance of Molland Lea and surface water must not drain onto the public highway.				
Access to Services SHLAA Score: -- The site is within five minutes walk of The Cartwright and Kelsey C of E Primary School. The village centre is approximately 500m away from the site with a wide range of facilities, public houses, shops and Doctors.				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis There are no overriding reasons not to develop this site. The site is, however, too small to allocate. As a general rule the Council will only allocate sites greater than five units. At 30 dph the site would result in only 4 units. At a higher density (40dph), which could be acceptable in this residential location, this could provide 6. The site is also already within the settlement confines.				

The site could, however, provide an opportunity for an emergency exit, walking/cycle route to local schools and green infrastructure for the larger site to the north (SHL026). It is suggested that this site be incorporated into the larger allocation.

Consideration for inclusion in the Submission Document?

Yes

Replacement/retention of scout hut.
In connection with SHL026

Site Code SHL026	Address Land at Chequer Lane	Parish Ash	Overall SHLAA Score 34.00 (6 – 10 years)	Area 3.06 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located to the north of Ash. The site consists of an agricultural field contained within a bund for the Ash bypass (A257), to the north, Chequer Lane to the east and residential properties to the south. There is no natural boundary to the west, which continues as open fields.</p> <p>The land is slightly raised above Chequer Lane, ranging between approximately half a metre at its lowest point to 1.5 metres at the highest (at the most northern end).</p> <p>A Public Right of Way runs across the site from the southern boundary towards the north eastern corner of the site (EE113) and another (EE112) runs along the southern boundary.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The settlement confines about the southern boundary of the site.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Conservation Areas or Listed Buildings close to or adjacent to the site.</p> <p>Landscape Impact</p> <p>The site is contained within the bund (which will remain) for the A257 (Ash Bypass) to the north and there are residential properties to the south and to the east.</p> <p>The Planning Inspector (at the 1998 Inquiry) considered that this site was part of a ‘continuous swathe of open countryside’ and that development would be quite prominent in the countryside. Whilst this development would extend the built form on the edge of the village it is now considered that it would have limited landscape impact due to the maturity of the vegetation on the bund and the existing ‘tongue’ of development between Chequer Lane and Queen’s Road. Structural landscaping would further contain the site to the west.</p> <p>Biodiversity</p> <p>The site is arable and is of a size that farmland birds need to be considered. The remaining biodiversity is likely to be restricted to the periphery, in particular the A257 planting. It would be necessary to assess use of this by bats.</p>				
EIA Screening: required due to site size.			Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a	

	contribution.
Green Infrastructure	
<p>The site is crossed by footpath EE113 and footpath EE112 runs along the southern boundary. Both show signs of regular local use. A site of this size would have to provide for sustainable surface water management and recreational open space. Given the concerns regarding European sites (Appropriate Assessment) above, recreational GI enhancement may be essential, decreasing the land available for housing. It would be important to maintain the ambience of the PRoW.</p>	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
<p>The path would need to be continued along Chequer Lane but this would also help visibility for any new access point. Any new access should be located away from the A257/Chequer Lane or Queen's Road/Chequer Lane junctions. Any development would need an emergency access if over 50 units (possibility of using Council Depot off Molland Lea, SAD024 or create a new access on Chequer Lane).</p> <p>There are walking and cycle connections and the wider road network could accommodate additional traffic from the development. Any development would, however, require a Transport Assessment.</p> <p>There is also an opportunity to develop a footway/cycleway through emergency access (off Molland Lea) to the local schools which could also be used for green/play area in conjunction with development.</p>	
Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school	
<p>The site is located within five minutes walk of Cartwright and Kelsey C of E primary school. The Doctors surgery is located to the south of the site (off Chilton Place) and is approximately ten minutes walk away. The village centre, with shops and bus connections (13 & 14 to Canterbury and Sandwich), is also approximately ten minutes walk away (via Chequer Lane). The Planning Inspector at the 1998 Inquiry commented that this site was within comfortable walking distance of all facilities and services.</p>	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
<p>There is development potential at this site. The site is well contained within the wider landscape, it is located within walking distance of local facilities and a suitable access is achievable, subject to the issues listed above. There is an opportunity to use the Council Depot off Molland Lea (which is allocated in the Preferred Options SAD) for an emergency exit, walking/cycle route to local schools and for green infrastructure. The western boundary treatment would need to be considered to curtail further development to the west. The only negative impact is that development would extend the urban form on the edge of the village but this is not considered to outweigh the other positive aspect of the development. Land would also need to be provided for the Thanet Coast SPA mitigation strategy.</p>	
Consideration for inclusion in the Submission Document?	Yes
<p>Western boundary treatment Considered together with SAD024 regarding connectivity Bat and bird survey Mitigation for European Designations</p>	

Site Code NS01ASH	Address Queens Road	Parish Ash	Overall SHLAA Score 35	Area 5.41 Ha
		Hierarchy Local Centre	6-10 Years	Indicative No. of units @ 30 dph = 162
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large, rectangular site located on the northern edge of the village. The site consists of farmland with associated sheds, which are located in a small area on the southern boundary. The appearance suggests that the area adjacent to Queen's Road, has not been managed for the past year as it has become overgrown. The land falls gently to the east. The local rugby club uses the south eastern corner of the site as a playing pitch.</p> <p>There are hedgerows along the eastern and southern boundaries of the site and around the farm sheds. There is also a line of trees along half of the southern boundary. There are trees and scrub along the northern boundary associated with the landscaping for the Ash bypass (A257). The eastern boundary is delineated by a track, which runs between the fields.</p> <p>The land uses surrounding the site consist of play facilities and formal open space to the south, residential properties (which back onto Queens Road) to the west, the A257 to the north (beyond which there are agricultural fields) and agricultural fields to the east. There is a residential property (Tara) located adjacent to north western corner of the site.</p> <p>Queens Road is a rural lane of varying widths but it is at its narrowest along the site boundary. There are two access points onto the site, from Queens Road to the west and from the existing junction (for a track) onto the A257 to the east.</p>				
<p>Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation</p> <p>Only the western boundary of the site is adjacent to the current settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or near to the site.</p> <p>Development of the whole site would, however, introduce development that would be against the grain of the existing settlement. Frontage development would introduce additional urban form on the edge of the village and change the character of the rural lane.</p> <p>Landscape Impact</p> <p>The site falls eastwards from the western boundary and levels out at the eastern boundary where there is a track, PRoW EE465, with an access onto the A257. Whilst there are trees and scrub along the northern boundary with the A257, this only provides screening when travelling from the west. Due to the topography and the lack of screening at the eastern end, the site is highly visible when looking westwards from both Sandwich road and the A257. Development at this scale, would, therefore, have a detrimental impact on the wider landscape and the setting of the settlement. At the 1998 Local Plan Inquiry, the Inspector commented that this site would be quite prominent in the surroundings.</p> <p>Biodiversity</p>				

<p>The site is managed as fields for vegetable growing. Biodiversity would be limited and transitional where fields have been left fallow. The structural vegetation associated with the A257 will provide some peripheral biodiversity.</p>	
<p>EIA Screening: required due to size.</p>	<p>Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.</p>
<p>Green Infrastructure</p> <p>The site currently only has a footpath (and farm track) EE465 running up the E boundary to the A257. A site of this size would be expected to contribute to GI, through surface water management and recreational space, notwithstanding the proximity of the Ash Recreational Ground. Given the concerns regarding European sites (Appropriate Assessment) above, such GI enhancement may be essential, decreasing the land available for housing.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>Queens Road is of varying width throughout its length and has inconsistent footway provision. The road narrows considerably in the vicinity of the site. The road is subject to a 30mph speed limit and is not subject to traffic regulation orders in the vicinity of the site. The site is fronted by established hedgerow and sight lines may require the removal of this to some extent. Queens Road would be unsuitable to accommodate a significant increase in vehicle and pedestrian movement.</p> <p>Whilst the local amenities and bus stops are within a 5 minute walk of the site, part of this walk is without footway provision on a narrow part of the carriageway on Queens Road. This could potentially be overcome if a metalled (surfaced) pathway was provided over the adjacent recreation ground to connect to the existing footway commencing in the vicinity of Chilton Field. Safe access to The Street could then be achieved, although overlooking of such a path may still be an issue.</p>	
<p>Access to Services SHLAA Score: 4.5 - Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is within five minutes walk of the GP surgery and the bus stop (to the south) along The Street. The local primary school is also close to the site but, due to the route to walk to the school, would probably take a little longer. The site is, however, adjacent to the local recreation ground (play space, cricket/rugby & tennis) and the local Library/village hall is located within five minutes walk away. The local shops are located approximately ten minutes walk away. Whilst the site is within walking distance of the facilities mentioned above, the site is not served by a continuous footpath (see comments in Proximity to Road Network). The Planning Inspector at the 1998 Inquiry commented that this site was within comfortable walking distance of all facilities and services.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>Whilst the site is within walking distance of the main facilities in the village centre, development of the site is considered to be unsuitable as there would be a detrimental impact on the wider landscape the setting of the village and on the rural character of the road. Queen's Road is also considered to be unsuitable for development at this scale.</p>	
<p>Consideration for inclusion in the Submission Document? No</p>	

Site Code NS02ASH	Address Land east of recreation ground	Parish Ash Hierarchy Local Centre	Overall SHLAA Score 32 6-10 Years	Area 2.82 Ha Indicative No. of units @ 30 dph = 85
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped piece of agricultural land, located on the north eastern side of Ash. The site is flat and is contained within hedgerows (along the north, western and southern boundaries) and residential properties (to the east). There appears to be no vehicle access onto the site. The only possibility being through White Post Farm, which has access onto the site (although this is not stipulated). There is a public footpath that runs along the western boundary of the site.</p> <p>The surrounding uses consist of open agricultural land (to the north, south and east), recreation grounds (to the west), allotments (to the south west) and residential (to the south east).</p>				
<p>Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation</p> <p>Only the south eastern boundary is adjacent to the settlement confines.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The south eastern end of the site is adjacent to the Street End Conservation Area and includes White Post Farm. If White Post Farm was to be used for the access route the changes required and the addition of other related paraphernalia, such as street lights, would change the character of this area and would be detrimental to the Conservation Area.</p> <p>Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space which makes a valuable contribution to the special character. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.</p> <p>Development would also be against the grain of the settlement in this location and would produce an urban peninsular in the open countryside.</p>				
<p>Landscape Impact</p> <p>The site is located on the edge of a rural settlement. Whilst there is existing residential development along Sandwich Road which provides some backdrop, the site remains somewhat distant being separated by an arable field and allotments from the bulk of the settlement. As a result the site would appear as a jarring feature having a detrimental effect both in the wider landscape and more locally.</p> <p>Allocation of this site could leave agricultural land to the south west vulnerable to further development.</p>				
<p>Biodiversity</p> <p>The site has hedging to the NE and SW and tree cover to the W. Apart from this, the site is arable with little value for biodiversity.</p>				

EIA Screening: necessary due to size.	Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.
<p>Green Infrastructure</p> <p>The site has a complex of footpaths to the NW of the site, with footpaths EE106 and 53A crossing the site, joining and meeting the western boundary footpath EE465. While this could severely limit development in this area of the site, it also offers the opportunity for integrating GI to the Recreation Ground further to the west. This approach could enhance biodiversity and given the concerns regarding European sites (Appropriate Assessment) above, such GI enhancement may be essential. There would also be a requirement for sustainable management of surface water.</p>	
<p>Proximity to Road Network SHLAA Score: 2.0 - Access investment required in a rural area including site visibility</p> <p>There has been no indication as to where the access onto the site would be from. The site would, therefore, have to be considered as landlocked. A possibility is White Post Farm as this appears to have an access onto the site. This farm is, however, within the Conservation Area so may not be suitable for reasons above. If access can be achieved the site is well related to the local amenities with The Street and is close to bus routes (Sandwich Road/The Street).</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>There are bus stops approximately 50m away from the site along Sandwich Road, for two services (13 & 14) which run hourly to Canterbury and Sandwich and pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). The local surgery is approximately 300m away from the site. The local shops are located further away but still within a ten minute walk.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is located close to local services it does not have an identified access and so would have to be considered landlocked. If an access could be established the measures needed would have a detrimental affect on the setting of the Conservation Area. Development itself would also have a detrimental impact on the Conservation Area and on the wider landscape.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS05ASH	Address Corner site between Three Chimneys and Holly House, Moat Lane	Parish Ash	Overall SHLAA Score No score – Site too small	Area 0.07Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 2
Current Use SHLAA Score: --				
Description of Site Small triangular shaped site consisting of grass, scrub and trees located along the southern boundary of the village. There also appears to be a demolished shed/building on the site. The site is flat but the rural lane that runs around its north eastern boundary falls away leaving a small bank between the road and site. There are residential properties on all sides of the site, apart from to the south western corner where there are open fields. The two properties immediately adjacent to the site have large gardens. There appears to be two farms to the south of the site, at Lawson Park and Moat Farm, both accessed from Moat Lane.				
Policy Alignment SHLAA Score: -- The northern tip of the site is adjacent to the settlement confine.				
Physical Constraints SHLAA Score: --				
Flood Risk The site falls within Flood Zone 1, so residential development would be appropriate within this zone.				
Historic Environment The site is adjacent to 'The Street' Conservation Area and a number of Listed Buildings to the north and west of the site. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space and soft vegetation which makes a valuable contribution to the special character. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.				
Landscape Impact The site is very contained and even with tree clearance, any development would be seen as part of the settlement.				
Biodiversity The site is unmanaged and comprises grass with small trees. It is likely to support common reptiles and may provide a foraging area for bats. The proximity of ditches and ponds within 100m to the south indicates that Great Crested Newts also need to be considered. The relevant biodiversity surveys should be carried out.				
EIA Screening: too small to be required			Appropriate Assessment: too small to be required	
Green Infrastructure The site is isolated in respect of GI and development would not be able to contribute significantly. Therefore, the site is GI neutral.				
Proximity to Road Network SHLAA Score: --				

Moat Lane is very narrow and without footways. The site fronts a long bend in the road which would make sight lines very difficult to achieve. Moat Lane is subject to traffic regulation orders for part of its length. This point of access would be unsuitable to accommodate the larger plot to the rear and, at most, could only support one or two dwellings depending on whether sight lines could be accommodated. The site is within walking distance to bus routes and local amenities (although there is no continuous footway).

Access to Services SHLAA Score: --

There are bus stops approximately 60m away from the site along Sandwich Road, for two services (13 & 14) which run hourly to Canterbury and Sandwich and pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). The local surgery is approximately 250m away from the site. The local shops are located further away but still within a ten minute walk. There is, however, a lack of footway from the site to Sandwich Road.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site could not be allocated as it is a small site. As a rule, the Council only allocates sites that would accommodate five or more units. This site does, however, currently lie outside the settlement confines and could not be developed. Consideration is, therefore, given to whether or not the confine should be amended to enable development.

Although the site is located close to local facilities, the access would appear to be unsuitable due to sight lines and a lack of footways and any development would have a detrimental impact on the setting of the Listed Buildings and Conservation Area.

Consideration for inclusion in the Submission Document?

No

Site Code ASH02 & ASH02V	Address Land to rear of 47 New Street	Parish Ash	Overall SHLAA Score 33.5	Area 1.49 Ha
		Hierarchy Local Centre	6-10 years	Indicative No. of units @ 30 dph = 45
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>ASH02: Square grass field located to the south of New Street and to the north of Moat Lane. Hedgerows surround the site boundary and one crosses the site diagonally. The land falls to the south. Surrounding uses consist of open land to the north, residential to the south and east and agricultural land to the west.</p> <p>ASH02V: The same location as ASH02 but with a variation to the boundary. The shape is now irregular as it includes land to the south east of SAD25, to enable access to New Street to the north and excludes land to the south of the hedgerow that runs diagonally across ASH02.</p>				
<p>Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation</p> <p>The site is located outside of the settlement confines. Only the north west corner abuts the confines.</p>				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be suitable for residential development.</p> <p>Historic Environment</p> <p>Development of the site would be detrimental to the setting of Ash, Street End Conservation Area and adjoining Listed Buildings. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space and soft vegetation which makes a valuable contribution to the special character. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.</p> <p>It would be difficult to improve the junction of Moat Lane and New Street without having a detrimental impact on the Ash Conservation Area and adjoining Listed Buildings.</p> <p>Landscape Impact</p> <p>The site falls southwards and is very prominent. It is divided by mature hedgerow. Any development would have a detrimental impact on the landscape quality in this area. The variation ASH02V, set on the higher ground, would still present a detrimental impact and the incorporation of the dense scrub area on New Street would exacerbate the incongruous urbanisation of a part of the village in which housing density is low and the urban edge field system plays an important character role.</p> <p>Biodiversity</p> <p>The grassland will only have limited biodiversity interest, however, the hedgerows on the boundaries will serve for nesting birds. Given the general grouping of older properties and the number of hedges in the vicinity, the area could constitute significant habitat for bats: utilising the hedges and fields for flightlines and foraging, respectively. The area of scrub and trees facing New Street is likely to provide refugia for small mammals and birds. The northern part of the district supports Great Crested Newts and this site lies within 300 metres of the ditch system which links to a known newt site; therefore, habitat suitability for Great Crested Newts will need to be carried out.</p>				
EIA Screening: required due to size.			Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a	

	contribution.
Green Infrastructure	
<p>The site has two PRoW which are of significance – footpath EE111 which runs between New Street and Moat Lane and footpath EE111A which crosses the hillside diagonally NW/SE connecting Street End with Moat Lane. These are apparently well-used local paths. EE111A, in particular effectively creates the break in the two variants of the site and on GI grounds would suggest that development of ASH02 would cause an undesirable change in ambience of this path. Both footpaths could experience undesirable urbanisation impacts. The slope of the land would give rise to concerns regarding sustainable surface water drainage, with naturalistic features, such as swales, being difficult to achieve, thus limiting biodiversity enhancement potential.</p>	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
<p>The site does not have a direct access onto Moat Lane, the only access being through that of the residential property Mill Croft. An acceptable vehicular access, however, cannot be created from Mill Croft to serve development as access from the existing road network would not be acceptable for any development due to road widths and junctions. There do not seem to be any other possibilities off either New Street or Mill Field without either crossing other properties or demolishing buildings. The site is therefore, landlocked.</p> <p>With regard to ASH02V, there would be significant gradient issues to overcome in order to gain an access off New Street at this location. If such an access could be achieved sight lines are likely to be achievable given that there is a footpath on the development side of the road. Bus stops are located in the immediate vicinity of the site. The road is subject to a 30mph speed limit and the wider road network would be able to cope with the additional traffic movements. The road will need to be laid out to an adoptable standard.</p>	
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk	
<p>There are bus stops within 30m of the site along New Street (13a) which runs hourly to Canterbury and Sandwich and pass through the main centre of Ash (with a range of shops, pubs and Doctors surgery). The local surgery is approximately 250m away from the site. The local shops are located further away but still within a ten minute walk.</p>	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
<p>ASH02 is landlocked but if an access could be established over third party land, the road network leading to the site is poor and would not accommodate the traffic envisaged. Any necessary road improvements would have a detrimental impact on the setting on the Ash, Street End Conservation Area and Listed Buildings. The site is in a prominent position on the edge of the village and any development on the site would have a detrimental impact on the landscape quality of the area. The site is, therefore, unsuitable for development.</p> <p>The variation of the site (ASH02V) identifies an access onto New Street which, although would be difficult due to gradient issues, would be possible to achieve. The variation in the boundary line would not overcome the detrimental impact development would have on the wider landscape and the setting of the village. In addition, development would urbanise rural PRoW. This site would, therefore, not be suitable for development.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code SAD25	Address Land adjacent to 47 New Street	Parish Ash	Overall SHLAA Score Not assessed, too small.	Area 0.16 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: --				
Description of Site Rectangular shaped site consisting of a large garden linked to 47 New Street. The site is flat but there is a small drop to the road. The south and eastern boundaries consist of trees and hedgerow. The northern boundary (New Street) consists of a picket fence. 47 New Street is partially within the confines and has recently been redeveloped with two residential dwellings.				
Policy Alignment SHLAA Score: The site falls outside the confines although the western boundary abuts them. The northern boundary is separated from the confines by the width of a road (New Street).				
Physical Constraints SHLAA Score: Flood Risk The site falls within Flood Zone 1, residential development would therefore be a compatible use. Historic Environment There are no Listed Buildings or Conservation Areas within the site. The Street End Ash conservation area lies 20m to the west of the site, on the opposite side of the two new dwellings on the site of No. 47. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space and soft vegetation which makes a valuable contribution to the special character. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves. Landscape Impact The site is on the ridge above the Poulton/Durlock drains, but is contained to the south by a hedge. This containment could be at risk with development: hedges are very susceptible to removal for views. Development here would intensify the urbanisation of part of the village that retains its characteristic interplay of housing, large gardens and fields. Biodiversity Bats have been recorded in the area, but only in one of three surveys on adjacent properties. However, the structured hedgerows in the area could provide important foraging and flightlines: this would need to be assessed. Otherwise, the site is likely to be limited for biodiversity, supporting common reptiles.				
EIA Screening: too small to be required			Appropriate Assessment: too small to be required.	
Green Infrastructure The site is isolated from existing PRow and could not realistically contribute to recreational GI. Biodiversity opportunities are also very limited. Overall, the site is GI neutral.				
Proximity to Road Network SHLAA Score: -- The site fronts New Street. There would be significant gradient issues to overcome in order to gain an access off New Street at this location. If such an access could be achieved sight lines are likely to be achievable given that there is a footpath on the development side of the road. Bus stops are located in the immediate vicinity of the site. The road is subject to a 30mph speed limit. The site could be served via a private drive for development of five or less units. A single point of access				

will be preferred over a succession of direct frontage accesses due to the alignment of the road and pedestrian visibility splays of 2m x 2m will need to be maintained above a height of 600mm either side of the new access.

Access to Services SHLAA Score: --

There are bus stops adjacent to the site which are served by 14a, a bus service which runs hourly to Canterbury and Sandwich. The site is approximately 550m away from the Doctor's surgery and 700m from the centre of Ash where there is a range of local shops and pubs. The local primary school is just under 1 km to the west of the site.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The size of the site would only provide four dwellings if developed. As a rule, the Council would only allocate sites that provide more than 5 units. There is, however, the question as to whether or not amend the Settlement Confines to include this land so that development could commence.

The site is located within walking distance of local services and is located within the sequentially preferable Flood Zone 1. Development here would, however, intensify the urbanisation of the rural edge of the village. Although the site is well contained by an existing hedge, this could be removed in the future. This would result in a detrimental impact on the wider landscape and the setting of the village. It is, therefore, concluded that the confines should not be changed for the whole site.

Consideration for inclusion in the Submission Document?

No

Site Code SHL011	Address Site at Millfield	Parish Ash	Overall SHLAA Score 31.50 (11-15 years)	Area 0.87ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Reversed 'L' shaped piece of grass land, located at the end of existing residential properties at Mill Field. This development is an affordable housing scheme which was developed under the rural exceptions policy and is located outside the confines. The site is bordered by residential properties to the north and fields to the south, east and the west.</p> <p>The site is grassed, slightly domed in topography and surrounded by hedgerows and formal privet hedging. The site is high in relation to surrounding land.</p> <p>Site has been suggested for both affordable and open market housing. The site is also being considered for affordable housing under the Rural Exceptions Policy DM6, outside of the Land Allocations Document process.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site lies adjacent to the village confines (the northern boundary abuts it). The site can be accessed from Mill Field, which is an affordable housing exceptions scheme, which has been excluded from the confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which is appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Buildings are 70m to the east (73 New Street) and 80m to the south west (Lovekey Cottage). Development would not detract from the setting of the Listed Buildings.</p> <p>Landscape Impact</p> <p>This is a highly sensitive site in reasonable landscape condition (the existing roofscape of Mill Field is a detractor).</p>				
<p>Development of the whole site would have a detrimental impact on long views of Ash from the south. There could also be pressure to remove the hedgerow after development has been completed, which would exacerbate the impact. The highly rural character of Coombe Lane and Moat Lane would be severely damaged.</p>				
<p>Development of the northern part of the site would have more limited impact and would be set against the existing Mill Field development. Care would still be needed in design terms to avoid creating a harsh urban skyline. The lower part of the field remains undevelopable and the roadside hedgerow would have to be retained, to limit visual impact from the valley.</p>				
<p>Biodiversity</p> <p>The local conditions would suggest that there may be a possibility of Great Crested Newts on the site and</p>				

<p>a habitat suitability assessment would need to be carried out. Likewise the Coombe Lane hedgerow may be of importance to bats. The potential for other biodiversity interest is limited.</p>	
<p>EIA Screening: required due to size.</p>	<p>Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.</p>
<p>Green Infrastructure</p> <p>Currently the site offers a 'green setting' for the edge of the village. Limited development would not overly harm this. There is PRoW on the site, although at the SW corner the paths EE111 and EE111A join and meet Moat Lane. Given that the southern part of the site is not suitable for built development, there would be the opportunity for relatively large-scale GI features to be incorporated. However, the viability of such land use is uncertain.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>There is an acceptable access for 50 units or less (which would also include the existing 15 units leading to the site) which would be achievable using the existing road (Mill Field). For more than 50 units, an emergency access would be required. This may be possible from Coombe Lane (to the south of the site) but this would require the removal of part of the hedgerow between the site and this road. There is an existing footway from Mill Field to New Street.</p>	
<p>Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The nearest bus stops are approximately 200m away from the site on New Street (14a, hourly to Sandwich and Canterbury). The Doctors surgery is approximately 850m away. The village centre is just under 1km and the local primary school is 1.4km away from the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is in a prominent position and development of the whole site would have a detrimental effect on the long views.</p> <p>Development could be possible if only the northern section of the site was developed (for approximately eight units). The land here is not as prominent and if the line of the existing development continued, this would not have a detrimental impact. The hedgerow, however, must be retained.</p>	
<p>Consideration for inclusion in the Submission Document? Yes</p> <p>Northern part of site only. Confine change to include Affordable Housing Retain hedgerow & land for Coastal SPA mitigation</p>	

Site Code ASH09	Address Land to the east of Cherry Garden Lane	Parish Ash	Overall SHLAA Score 31.5	Area 0.68 ha
		Hierarchy Local Centre	11-15 years	Indicative No. of units @ 30 dph = 20
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site Irregular shaped site located on the eastern side of Ash consisting primarily of grazing paddocks, associated sheds and a residential house (Cherry Garden). The site appears to be flat but the land is raised (by approximately 1m in some areas) in relation to Sandwich Road on the northern boundary, and Cherry Garden Lane on the western boundary.</p> <p>The site is enclosed by hedgerow and trees, which runs along most of the site boundary. There is one access onto the site from Cherry Garden Lane, which serves the house and farm related sheds. Cherry Garden Lane is a single width rural lane.</p> <p>The surrounding uses consist of a former orchard with associated sheds to the east (ASH06) and residential properties to the south. To the west, on the far side of Cherry Garden Lane, there is a mixture of new residential dwellings and a large institutional building. To the north, adjacent to the site, there is a residential property, and on the far side of Sandwich Road, there are open fields.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The west and southern boundaries of the site are adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk The site falls within Flood Zone 1, residential development would be an appropriate use.</p>				
<p>Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. There is, however, one Listed Building, 50 New Street, located approximately 25m from the south eastern corner of the site.</p>				
<p>Landscape Impact The site is discrete, on level raised ground behind hedges, but appears to be used for horses. As such the significance of the site in terms of character and visual impact is quite low. However, opening up of any boundaries will affect visual impact and also character. The sunken lane, Cherry Garden Lane, is an important landscape asset which should not be jeopardised. Likewise the frontage to Sandwich Road is important in protecting the existing character.</p>				
<p>Biodiversity The site is likely to contain common reptiles and a habitat suitability assessment for Great Crested Newts will be necessary. Bats have been recorded on the other side of Cherry Garden Lane and surveys should be carried out as appropriate, including potential for roosting in any mature trees on the site.</p>				
EIA Screening: screening necessary due to size			Appropriate Assessment: contribution to Thanet coast SPA Mitigation strategy necessary.	
<p>Green Infrastructure Cherry Garden Lane connects PRoW footpath EE111 and Public Bridleway EE466, which emphasises</p>				

the importance of retaining the character of the lane. Beyond that, for landscape protection, the site should be considered as an isolated area, screened as fully as possible.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site currently has one access onto the site from Cherry Garden Lane. If no improvements were to be made to the road, this access would not be suitable for further development due to the narrow width of the lane and the provision of sight lines.

If the land owner was able to gain control of a strip of land running alongside Cherry Garden Lane from the site access to Sandwich Road to the north (since all of this land is shaded in the LAD) then the lane could be widened to accommodate two way traffic and achieve the necessary sight line to the RHS when leaving the sight. The section to the south could be stopped up to vehicle traffic as no accesses fall within this section. It may be advantageous if the development on these sites still allowed accessibility between New Street and Sandwich Road for vehicles but this would not be essential.

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk

The site is adjacent to bus stops on Sandwich Road that serve two routes (13 and 14) and which run hourly to Sandwich, Canterbury and Deal and pass through the centre of the village. There are also a bus stop serving route 13a (which runs hourly to Canterbury and Sandwich) approximately 70m to the south west of the site. There are no footpaths, however, along Cherry Tree Lane to safely walk to it.

The site is approximately 650m from the local Doctors surgery and just over 1km from the local primary school. The site is also just over 820m from the village centre.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is located in the sequentially preferable Flood Zone 1, is close to public transport connections and is within walking distance of the village centre. Development of the site would also not have a detrimental impact on the wider landscape or setting of the village if the boundary hedging is retained.

Access, however, would only be suitable if Cherry Garden Lane was widened but this would have a detrimental impact on the character of the rural lane and this part of Ash. Access would therefore have to be through an adjacent site.

Consideration for inclusion in the Submission Document?

Yes

- Retention of boundary vegetation
- Setting of Listed Building

Site Code ASH06	Address Land to the east of 53 Sandwich Road, lying between Sandwich Road and New Street	Parish Ash	Overall SHLAA Score 33.5 6-10 years	Area 1.32 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 39
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped site located in the eastern part of Ash. The site appears to be flat but it is slightly raised in relation to Sandwich Road along the northern boundary, where there is a slight bank. The majority of the site appears to be an unmanaged orchard contained within a mature hedgerow, which runs around almost the entire boundary. There are around five redundant single story industrial units located to the south of the site where the site fronts New Street. These were used in connection with the orchard. There is a building fronting New Street that has the appearance of a two storey modern dwelling but is used for sales. The site boundary also includes a dwelling that also fronts New Street. The main entrance to the units (and the site) runs between the sales building and the dwelling. The uses to the west consist of residential (along New Street and one property on Cherry Garden Lane) and grass paddocks for grazing sheep. The uses to the south east consist of residential (Pippin Close) and to the north east, storage and retail (Masstock). To the south there are further residential properties (New Street and Mill Road). To the north there is open agricultural land. The southern half of the site (excluding the industrial units) has been subject to an outline planning application (DOV06/00606) for residential development but this was refused on the grounds that; the application was premature (in light of the LDF process); that it was outside of the Settlement Confines; that the proposed access would dissect a hawthorn hedge; and there was no justification for the loss of Grade 1 agricultural land.				
Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation				
There is a small area to the south (where the residential property and sales building are located) that is within the settlement confines. The remaining area is outside. The southern and south eastern boundaries abut the confines. Part of the site is currently used for employment purposes. Adopted Core Strategy Policy DM 2 would therefore apply.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site falls within Flood Zone 1, residential development would be an appropriate use.				
Historic Environment 50 New Street is a Grade 2 Listed Building and this is adjacent to the modern sales building. Redevelopment of the modern building could be an opportunity to improve the setting of the Listed Building on New Street. Development behind the property could have a detrimental impact on the setting of the Listed Building.				

Landscape Impact

The site has an urban edge character determined mainly by the hedged orchard to the north. The change in character caused by development would not be at odds with urban expansion elsewhere. The site grades down in a northerly direction terminating in a mixed roadside hedgerow. If the majority of the roadside hedgerow is retained, development would be seen against the backdrop of existing development on New Street and, if broken by planting, there would not be significant adverse landscape impact.

Biodiversity

The site is predominantly orchard with hedge boundaries and is likely to support species associated with such. Common birds may use the hedging for nesting. Common reptiles may occur, particularly associated with some rough grassland to the SE. The presence of drains within 500m indicates that a habitat suitability assessment for Great Crested Newts be carried out. Bats may use the hedgerows for foraging and this aspect would also require survey, as well as for any demolition of buildings. Subject to the findings of such surveys, there would be no particular biodiversity constraints to development.

EIA Screening: screening necessary due to size

Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary.

Green Infrastructure

There are no PRoW in or near the site. The site could provide a useful pedestrian link between New Street and Sandwich Road and it is of a size that a central open space should be provided which could incorporate SuDs so as to enhance biodiversity, given the gentle slope of the site.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site fronts both Sandwich Road and New Street. Sight lines may well be achievable on New Street. The access would need to be demonstrated to achieve 43m x 2m x 43m sight lines, which is probably only likely if the access is located in the centre of the area shown shaded on the LAD map and includes the properties either side. If this is not achievable this access would be suitable as an emergency access to the development, which would be required for developments over 50 units. Access from Sandwich Road would, however, be suitable but this would involve the removal of the hedgerow. A third option, through 17 Pippin Close, has also been suggested by a third party. This is also considered to be a suitable option.

There is also a continuous footpath to the centre of Ash from the northern boundary along Sandwich Road and bus stops within 800m of the site (this is in accordance with Manual for Streets Guidance).

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk

The southern entrance is approximately 115 metres away from a bus stop that serves the 14a service (hourly to Sandwich and Canterbury). The northern part of the site is adjacent to a bus stop that serves the 13 and 14 service (hourly to Sandwich, Canterbury and Deal). All three services pass through the centre of Ash.

The site is approximately 780m from the Doctor's surgery, 1.2km away from the local primary school and 900m from the village centre.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is located within the sequentially preferable Flood Zone 1, close to bus routes to the north and south of the site and there are suitable options for an access. Development would not have a detrimental impact on the wider landscape. The site is, however, located just within what is considered to be a suitable walking distance.

Although a planning application was refused, this was on the basis of prematurely, being outside the confines and the need for the loss of Grade 1 agricultural land. The allocation of the site would be because it would be required to meet the requirements identified in the Core Strategy and so these issues would be overcome.

Consideration for inclusion in the Submission Document?

Yes

Landscaping along Sandwich Road

Access

Assessments for Great Crested Newts and Bats

Site Code ASH07	Address Masstock, 65 Sandwich Road	Parish Ash	Overall SHLAA Score 35.5 6-10 years	Area 0.40 ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 12
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Flat, rectangular site located on the eastern part of Ash consisting of three units/sheds and hard standing. The site fronts Sandwich Road, which runs along the northern boundary of the site. The site has been subject to a recent refurbishment including the demolition of a derelict house (formerly fronting Sandwich Road), the construction of new security railings and new access arrangements. The site is occupied by Masstock an agricultural merchants.</p> <p>To the east of the site there are residential properties fronting Sandwich Road and a grass field (ASH04). To the west and south there is a former orchard (ASH06). To the north, beyond Sandwich Road, there are open fields.</p> <p>Masstock has indicated that they would not seek development within the next five years but would not wish to preclude the site from the process.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is located outside of the Settlement Confines and, as the site is a business use, would be subject to adopted Core Strategy Policy DM2.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, residential development would be an appropriate use.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Building is approximately 100m to the south of the site on New Street. The setting of this building would not be affected by redevelopment of this site.</p>				
<p>Landscape Impact</p> <p>The character of the area is industrial, which redevelopment would change, but insignificantly so. Housing would not provide any greater visual impact.</p>				
<p>Biodiversity</p> <p>The site is mainly built development (modern warehousing) and hardstanding. The boundary hedges may support common garden birds. It is unlikely that there is any other significant biodiversity that could constrain development.</p>				
EIA Screening: Too small			Appropriate Assessment: too small	
<p>Green Infrastructure</p> <p>The site is self-contained without any PRow on the site or nearby. Development would be self-contained unless and access through to Collar Maker's Green with its open space and play area was possible.</p>				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site				

<p>The site has an existing access onto Sandwich Road which is used by delivery trucks. A suitable access could be created for residential development on this site.</p>	
<p>Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk</p> <p>The site is between 118m to 190m (approximately) from two bus stops, which serve two routes (13 and 14) hourly to Sandwich, Canterbury and Deal and pass through the centre of the village. The site is approximately 842m from the local Doctors surgery and 1.1km from the local primary school. The site is also just over 970m from the village centre.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located in the sequentially preferable Flood Zone 1, is close to public transport connections and is within walking distance of the village centre. Development of the site would also not have a detrimental impact on the wider landscape or setting of the village. A suitable access could also be created.</p> <p>The site is, however, still in an employment use and would be subject to the requirements of Policy DM2 in the adopted Core Strategy which seeks to retain employment land.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Employment Assessment Longer Term for development</p>	<p>Yes</p>

Site Code ASH10	Address 67 – 71 Sandwich Road	Parish Ash	Overall SHLAA Score 33.5 6-10 years	Area 0.19 ha Indicative No. of units @ 30 dph = 5
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Rectangular site consisting of three detached properties (a bungalow and two, two storey dwellings) fronting Sandwich Road. They are set back from the road and have front and rear gardens.</p> <p>To the south of the site there is an open field (together with this field the three properties have also been submitted as ASH04) and to the west there is Masstock (ASH07). To the east there is a terrace of four residential properties (which form part of a settlement confine extension request SHL012).</p> <p>No.69 Sandwich Road has been submitted to facilitate access to the land behind (ASH04).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is outside of the settlement confines. The nearest confine is 20m away from the eastern boundary.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, residential development would be an appropriate use.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Building (101 Sandwich Road) is approximately 200m to the east. Development at this site would not effect the setting of the Listed Building.</p> <p>Landscape Impact</p> <p>There would be little impact on the wider landscape.</p> <p>Biodiversity</p> <p>There could be bats so a survey would have to be undertaken before any demolition.</p>				
EIA Screening: Too Small			Appropriate Assessment: Too small	
<p>Green Infrastructure</p> <p>The site consists of dwellings, which would not contribute to GI. There would, therefore, be no loss of GI if the site was developed. The site would also be too small to contribute to the GI network.</p>				
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>Kent County Council’s Highway section has suggested that, whist this would be achievable, it would be preferable to have the access from the frontage of No.71 and then curve it onto the land of No.69.</p> <p>There is a continuous footway to the centre of the village.</p>				
<p>Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk</p>				

The site is located between two bus stops (approximately 150m to the west and 100m to the east), which serve two routes, 13 and 14, hourly to Sandwich, Canterbury and Deal and pass through the centre of the village. The site is approximately 900m from the local Doctors surgery and 1.3km from the local primary school. The site is also just over 1km from the village centre.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

The site has been suggested to enable access to the land to the rear (ASH04). In highway terms this would be acceptable and the loss of a dwelling here would not have a detrimental impact on landscape, GI or heritage assets.

A bat survey would be required as part of any demolition.

Consideration for inclusion in the Submission Document?

Yes

Bat Survey

Site Code ASH04	Address 67 – 71 Sandwich Road and land to the rear	Parish Ash	Overall SHLAA Score 31.5	Area 0.70Ha
		Hierarchy Local Centre	11-15 years	Indicative No. of units @ 30 dph = 21
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site Flat irregular shaped site located on the eastern side of Ash. The site consists of three existing properties fronting Sandwich Road and a rectangular grass field behind. A small area of this field is used for storage of building materials (within a poly tunnel). The eastern and southern boundaries consist of fencing and trees/scrub. There is scrub running along the western boundary.</p> <p>The neighbouring uses consist of residential to the east (Sandwich Road and Russett Close) and south (Pippin Close) and a storage depot to the west (currently being used by Masstock). To the north is Sandwich Road beyond which there are open agricultural fields.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is outside the settlement confines but the southern and eastern boundaries abut them.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk The site falls within Flood Zone 1, residential development would be an appropriate use.</p>				
<p>Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to this site.</p>				
<p>Landscape Impact The area is predominantly urban in character and the existing is rather anomalous. The site is contained within development on all sides. Access has been suggested from Sandwich Road and this would involve the removal of a property (possibly No.69), consequently there would be no significant adverse visual impact.</p>				
<p>Biodiversity The site is bound by hedgerow to W, S and E. The main area is mown grassland. Common birds may use the hedging for nesting. Common reptiles may occur, but probably in low number. The presence of drains within 500m indicates that a habitat suitability assessment for Great Crested Newts be carried out. Bats may use the hedgerows for foraging and this aspect would also require survey. Subject to the findings of such surveys, there would be no particular biodiversity constraints to development.</p>				
<p>EIA Screening: size would require EIA screening</p>			<p>Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be required.</p>	
<p>Green Infrastructure The site is isolated and self-contained. There are no PRoW in or near the site. If access were via Pippin Close, there would be the potential to have a pedestrian link, allowing access to the open space and play area in Collar Makers Green , thus enhancing utilisation of GI.</p>				
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p>				

The access has been suggested from Sandwich Road and this would involve the removed of a property (possibly No.69) to facilitate this. Kent County Council's Highway section has suggested that, whilst this would be achievable, it would be preferable to have the access from the frontage of No.71 and then curve it onto the land of No.69. An alternative access, from 17 Phippen Close, has been suggested by a third party. Kent Highways has indicated that this solution would also be acceptable.

There is a continuous public footpath from the site to the village centre and bus stops within 800m of the site (this is in accordance with Manual for Streets Guidance).

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk

The site is located between two bus stops (approximately 150m to the west and 100m to the east), which serve two routes, 13 and 14, hourly to Sandwich, Canterbury and Deal and pass through the centre of the village. The site is approximately 900m from the local Doctors surgery and 1.3km from the local primary school. The site is also just over 1km from the village centre.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

The site is located within the sequentially preferable Flood Zone 1, close to public transport and there are two suitable accesses onto the site. Furthermore development would not have a detrimental impact on any historic assets or the wider landscape. The site is, however, on the periphery of Ash, being just over a kilometre away from the village centre.

As the distance from the site to the village centre is still within walking distance, that there is a continuous footpath and the site is located close to public transport, it is considered that this issue does not override the positive aspects of this site.

Consideration for inclusion in the Submission Document? Yes

Site Code	Address	Parish	Overall SHLAA Score	Area
LDF04 (ASH11)	Land between Cherry Garden Lane and 79 Sandwich Road (including 52 New Street to the south).	Ash Hierarchy Local Centre	36.5 (6-10 Years)	3.23 Ha Indicative No. of units @ 30 dph = 96
Current Use SHLAA Score: 3.0 – Fully occupied single use (eg factory, school)				
<p>Description of Site</p> <p>Large irregular shaped site located on the eastern side of Ash within multiple ownership (consists of original site references of ASH04, ASH06, ASH07, ASH09 & ASH10 – or just ASH11). The site has mixed use comprising primarily of agriculture land but there is also an agricultural merchants on part of the site (Masstock), some residential and grass field. There are residential uses to the south, west and east of the site. To the north, on the opposite site of Sandwich Road, there is an agricultural field.</p> <p>The site gently slopes to the south. The topography outside the site changes and this has resulted in the site being 2 to 3 meters higher than Sandwich Road at the north western corner. Mature hedgerows form the boundary line around the majority of the northern, eastern and western boundaries.</p> <p>Masstock, the agricultural merchant, has indicated that they would not seek development within the next five years but would not wish to preclude the site from the process. An alternative access (17 Pippin Close) has been suggested as a possible access to the site in the event that Masstock did not wish development.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>Only a small area of the site (the southern most tip) is within the settlement confine with the majority falling outside. The western, southern and eastern boundaries do, however, abut the confine.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Small areas of sloping land, woods or hedgerows, to be addressed</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, residential development would be an appropriate use.</p>				
<p>Historic Environment</p> <p>50 New Street is a Listed Building and any development must respect the setting of this building.</p>				
<p>Landscape Impact</p> <p>The site gently slopes down towards Sandwich Road. The Sandwich Road frontage is partially obscured by adjacent housing with the site opening out behind into a pasture. The boundaries of the pasture to the west, south and east have a substantial hedgerow. The site is very discrete. Redevelopment particularly of the Sandwich Road frontage would require very careful design particularly in terms of design, layout, height and roofscapes to avoid adverse impact on the wider landscape.</p>				
<p>Biodiversity</p> <p>Redevelopment of the buildings on site would require a bat survey. There is likely to be biodiversity interest in the hedgerow and pasture, which needs to be protected and incorporated in any development, therefore, wildlife surveys would be required.</p> <p>The presence of drains within 500m indicates that a habitat suitability assessment for Great Crested Newts be carried out. Bats may use the hedgerows for foraging and this aspect would also require survey. Subject to the findings of such surveys, there would be no particular biodiversity constraints to development.</p>				

EIA Screening: required due to size.	Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.
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Green Infrastructure

A site of some interest in that it links through from the Sandwich Road to New Street, thus offering the opportunity to increase the permeability of the village. This is particularly the case if westward links towards Collar Makers Green could be established, creating a GI network running with the grain of the village. There are currently no PRow on the site although Cherry Garden Lane connects PRow footpaths EE111 and EE466, which emphasises the importance of retaining the character of the lane.

The gentle slope of the land to the north indicates that SUDs may be suitable for surface water drainage and this could be linked to biodiversity enhancement.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

A suitable access from Sandwich Road could be achieved for the whole site. One access should serve the whole site but development over 50 units would also require an emergency access, this could be onto New Street. If Masstock did not wish to develop, two access for each part of the site either side would be acceptable. The eastern part could be access from the frontage of 71 Sandwich Road. Kent Highways has indicated that a speed survey would, however, have to be carried out and the results of this would dictate the junction spacing.

It has also been suggested that an access through Pippin Close could be established (through the demolition of No. 17). 17 Pippin Close could either serve as a main access or an emergency access to ASH04 and/or ASH06.

Access may also be possible from New Street if it can be demonstrated that site lines could be achieved, which is probably only likely if the access is located in the centre of the area identified, including properties immediately to the east and west. If this is not possible the access could be used as an emergence access.

With regard to Cherry Garden Lane if the land owner was able to gain control of a strip of land running alongside Cherry Garden Lane from the site access to Sandwich Road to the north (since all of this land is shaded in the LAD) then the lane could be widened to accommodate two way traffic and achieve the necessary sight line to the RHS when leaving the sight. If this was not possible, this access would not be suitable.

Good pedestrian links onto both Sandwich Road and New Street should also be provided.

Access to Services SHLAA Score: 3.0 - Site with at least 2 of 3 from: public transport, GP Surgery and school within 10 minutes walk

There are bus stops adjacent to the site, which serve two routes, 13 and 14, hourly to Sandwich, Canterbury and Deal (and pass through the centre of the village). The GP surgery is located approximately 680m away from the site. The village centre, with a range of shops, is approximately 800m away.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 3.5 – 2-3 Ownerships

Analysis

The site is located in the sequentially preferable Flood Zone 1, the majority of the site is discrete and so development would not have a detrimental impact on the wider landscape (although the frontage along Sandwich Road would have to be sensitively designed) and development would also provide an opportunity for increased GI and improved permeability. There are also a number of access options that are also suitable either on their own or in combination.

Any development would, however, require land for recreational mitigation for the Thanet Coast SAC, which would reduce the overall number of dwellings on the site.

Multiple landownership is, however, an issue. It would appear that all but one landowner would seek development within the next five years. To reduce the impact of possible multiple access and to ensure a comprehensive development it is suggested that the site is phased after the five year period.

Consideration for inclusion in the Submission Document?

Yes

Design (height of buildings along Sandwich Road)

A habitat suitability assessment should be carried out (inc. Bats, Great Crested Newts)

SAC mitigation

GI

Site Code SHL012 & ASH01	Address Land at Sandwich Road, Ash inc 99 Sandwich Road	Parish Ash	Overall SHLAA Score 31.5 (11-15 Years)	Area 0.9Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 27 (5 for smaller site)

Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation

Description of Site

Two sites that overlap to form a rectangular shape. SHL012 includes residential properties from 73 (to the west) to 99 (in the east) Sandwich Road. ASH01 refers only to 99 Sandwich Road. SHL012 has been put forward for inclusion within the Settlement Confines, rather than for new development. ASH01 has been suggested for development.

ASH01 has residential development to the west and south. To the east there is a listed building. The properties front Sandwich Road to the north, beyond which there are agricultural fields.

99 Sandwich Road has had previous planning applications for redevelopment.

Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation

Both sites are outside the settlement confine. The area identified abuts the confines along the southern boundary. Collar Makers Green, which runs down the side of No.99, is within the confines.

Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints

Flood Risk

The sites are within Flood Zone 1, which would be appropriate for residential development.

Historic Environment

With regard to 99 Sandwich Road, the site is at the entrance of a new development and is close to a Listed Building (101 Sandwich Road). This site has been subject of a planning application (DOV/04/00973) for five, five bed dwellings, which was refused and then subject to an appeal (APP/X2220/A/04/1164285), which was dismissed by the Planning Inspector.

The Inspector concluded that the development of five houses at this prominent position would unacceptably detract from the character and appearance of this part of the edge of the village outside the development boundary, which is very different from the estate developed behind, and would further detract from the setting of the Listed Building as seen on entering the village.

Development at a density in line with the Core Strategy would, as the Inspector has already indicated, be detrimental to the setting of the adjoining listed building.

The remaining dwellings along Sandwich Road have been requested to be included within the Settlement Confines. It is unlikely that any additional development would be proposed.

Landscape Impact

The two sites are in a very prominent position located on the edge/entrance to a site that has been developed for housing. Any redevelopment must respect the village edge and be of low density and careful design (massing, materials should reflect existing).

Biodiversity

There may be a limited biodiversity such as that associated with gardens but if there was to any demolition bat surveys would need to be undertaken.

EIA Screening: required due to size	Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.
<p>Green Infrastructure</p> <p>There are no PRoW here, the site comprising housing. A link between the Collar Makers Green/Pippin Close housing and Sandwich is already in place and reflects an out-dated approach to the provision of intra-urban footpaths; development could rectify this. The site has little opportunity to provide biodiversity enhancement and appears poorly configured for providing SUDs.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>With regard to the redevelopment of No. 99 the vehicular access onto Sandwich Road would not be acceptable due to proximity of Pippin Close junction. Access would, however, be acceptable onto Pippin Close to serve up to five dwellings.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk</p> <p>The sites are located at the far eastern edge of Ash. This site is located at the far eastern edge of Ash. The site is only within ten minutes walk of the bus stops (13 &14 services, hourly to Canterbury and Sandwich).</p> <p>An important consideration and a point that was made by the Inspector at the Local Plan Inquiry about the site adjacent to this (Wimpey) was that it was at the margins of comfortable walking distance and was less than ideal as it was located some way from the village centre and primary schools.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 3.0 – Multiple up to 1 hectare</p>	
<p>Analysis</p> <p>99 Sandwich Road is not suitable for development as it is located in a particularly prominent position at the edge/entrance to the village and the neighbouring property is a Listed Building. The site has been subject of an appeal in the past where the Inspector concluded that the development at this prominent position would unacceptably detract from the character and appearance of this part of the edge of the village, outside the development boundary and would further detract from the setting of the Listed Building as seen on entering the village.</p> <p>The remaining properties in SHL012 have already been developed and they are adjacent to the existing confines. If the neighbouring site (LDF04) is considered to be acceptable, it would be logical to include the 73 to 99 Sandwich Road within the settlement confines. The outstanding issues (impact on the Listed Building and massing on the edge of the village) with No.99 would still be relevant and would be a Development Management consideration even if the site was included within the confines.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Amend confines to include 73 to 99 Sandwich Road within the village confines.</p>	<p>Yes</p>

Site Code ASH03	Address Nursery site, including 103 Sandwich Road and 98 New Street	Parish Ash	Overall SHLAA Score 36 (6-10 Years)	Area 4.96 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 4.0 – Partially occupied single use site				
<p>Description of Site</p> <p>Large irregular shaped site on the eastern extremities of Ash consisting of mixed use; residential (to the north); landscaping contractors/nurseries and associated buildings (to the east) and agricultural land (south and west). The site is concave in topography dropping at various gradients to the centre from all boundaries. There are two entrances to the site off Saunders Lane, one for the residential and one further along Saunders Lane for the contractors. This access also has some hard standing for parking. A third access point (a track) is off New Street to the south between residential properties.</p> <p>The site is heavily treed in the north and east along the boundary line. The boundary around the whole site consists of hedgerows. Hedgerows also run along the agricultural plots within the site.</p> <p>The neighbouring uses consist of residential to the south and west and agriculture to the north and east. The site has been subject to a planning application for residential development in the past but this was refused.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation The site lies adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows, to be addressed</p>				
<p>Flood Risk The site falls within Flood Zone 1, which is appropriate for residential development.</p>				
<p>Historic Environment</p> <p>101 Sandwich Road, which is located on the corner of Sandwich Road and Collar Makers Green, is a Listed Building. Development within the vicinity of the Listed Building would have a detrimental impact on its setting. Development proposals for a neighbouring property (see ASH01) failed at appeal because it would detract from the setting of the Listed Building as seen on entering the village. Development of this site would have a greater impact. Road widening to achieve an acceptable access would also change the character of area.</p> <p>The Thatched barn/outbuildings (possibly fifteenth century), are also an undesignated heritage asset which makes a positive and significant contribution to this rural scene. For this reason they are of considerable local interest.</p>				
<p>Landscape Impact</p> <p>The site is well contained and screened. There are views in to it from the north but these belie the nature of the site, which rises steeply up behind a screening of trees to the far south. The site contains mature trees and other vegetation associated with nurseries. There may be contamination concerns from on-site waste management (Google Earth 2008, accessed 2011). Low density housing might have little impact if associated with Sandwich Road, however, densities required by the adopted Core Strategy would have a highly detrimental impact on the landscape and setting of the village.</p>				
<p>Biodiversity</p> <p>The site has an established pond to the north of the site. There would be a requirement for surveying for Great Crested Newts. The dense vegetation could be a benefit to bats and it is likely that the nature of the current use of the site would support other biodiversity such as common reptiles.</p>				

EIA Screening: required due to size.	Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a contribution.
<p>Green Infrastructure</p> <p>The site has no ProW within it, although footpath EE108A runs N/S along the western boundary and two other paths, EE96 and EE469 join the Saunders Lane boundary side. There could be potential for pedestrian linking the rear of the site through to Collar Makers Green. The site would appear suitable for use of SUDs and this could enhance biodiversity, although that needs to be considered against any loss that may occur through development, indicating a necessity for EIA.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Access from Sandwich Road is not acceptable due to proximity with Pippen Close and because of difference in levels between the frontage of the site and the road. Saunders Lane is too narrow for the envisaged development. It cannot be easily widened due to existing residential properties on the New Street end (to the south) and at the Sandwich Road end due to previously mentioned difference in levels. On the basis of the implied level of development there would also be concern about the operation of the junction with Sandwich Road due to its proximity to the A257 junction.</p> <p>Access was one of the reasons for refusal of an outline planning application (DOV/00/00378). The applicant gave insufficient information to demonstrate that a satisfactory access could be created.</p>	
<p>Access to Services SHLAA Score: 2.5 – Site with at least 1 of 3 from :public transport, GP surgery and school within 10 minutes walk</p> <p>This site is located at the far eastern edge of Ash. The site is only within ten minutes walk of the bus stops (13 &14 services, hourly to Canterbury and Sandwich).</p> <p>An important consideration and a point that was made by the Inspector at the Local Plan Inquiry about the site adjacent to this (Wimpey) was that it was at the margins of comfortable walking distance and was less than ideal as it was located some way from the village centre and primary schools.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>There is no achievable access onto this site due the restrictive existing road network and the undulating topography of the site. Development at the envisaged Core Strategy densities would also have a highly detrimental impact on the landscape and character of the village. Development would also have a detrimental impact on the setting of 101 Sandwich Road, which is a Listed Buildings. Any development on this site would also be on the far edge of the settlement away from the existing local facilities.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL013	Address The Vineries & 115 New Street Ash	Parish Ash	Overall SHLAA Score 38.00 (0-5 years)	Area 0.94 Indicative No. of units @ 30 dph = 28
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>It has been requested that The Vineries be included within the settlement confines to allow for new development. To do this No's 111 and 115 New Street would also need to be included as they lie between the Vineries and the existing settlement confine.</p> <p>Irregular shaped site consisting of two distinct sections of land fronting New Street on the south eastern extremity of Ash. The northern section is a residential property consisting of a two buildings and a large rear garden. The second piece of land, separated from the other by a belt of trees/scrub, has a longer frontage but is almost half the depth of the other and, when submitted to the Council for consideration, consisted of a derelict building and former garden which had reverted back to scrub to the north. This building has now been demolished and planning permission for a new dwelling (DOV/11/00063) has been granted.</p> <p>The boundary line consists of scrub and hedging. Both pieces of land fall to the south, away from the road. The site is surrounded by low density residential properties to the north east and north west and by fields to the south west. There is also a property to the south east of the site. There may also be an underground power line crossing the south eastern part of the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site lies adjacent to the village confines (a section of the northern boundary abuts the confine).</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk The site lies within Flood Zone 1, residential development would be appropriate in this zone.</p> <p>Historic Environment There is a Listed Building (Hills Downe) on the opposite side of road to the north of site. Development in this location would, however, not detract from the setting of this particular Listed Building.</p> <p>Landscape Impact Highly sensitive in moderate condition. Further development below road line would alter the character this particular area (edge of village) for the worse. Dwellings along road may be acceptable reflecting current built form i.e. frontage development, with gaps to allow long views of the countryside behind, but essentially this is a village edge location and any density must provide a sensitive transition.</p> <p>Biodiversity There would be a possibility of Great Crested Newts, bats and reptiles on the site. A survey would have to be carried out on the site before any development were to take place</p>				
EIA Screening: required due to size.			Appropriate Assessment: Ash lies within 10 Km of Pegwell Bay. There could be in-combination recreational impacts with other northern sites calling for more mitigation than is currently provided for in the Thanet Coast SPA mitigation strategy to which there would have to be a	

	contribution.
Green Infrastructure	
<p>There are no PRow's on or adjacent to the site. The site itself is rather isolated in respect of recreational GI interest. There may be difficulty developing the site in respect of sustainable surface water drainage, thus limiting opportunities for biodiversity enhancement. Overall the site is GI neutral.</p>	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
<p>Sight lines would be poor to this site but could possibly be achieved if a footway was provided along the development frontage. Existing accesses are in place without the benefit of turning provision. There is no crash record to suggest that this is a problem but it would be preferred to see any direct frontage access incorporating turning space within the curtilage of each property or alternatively a single point of access to a parking area to facilitate the new build.</p> <p>There is a pavement on the opposite side of the road which runs most of the way to the centre of the village.</p>	
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk	
<p>The site is within 5 minutes walk of the bus stop (14a to Sandwich and Canterbury). This route passes through the village centre.</p>	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 3.5 – 2-3 Ownerships	
Analysis	
<p>Changing the confines would allow for further development. It would only be acceptable for small, low density development that reflected the current built form and retained the substantial gaps between buildings to allow long views of the countryside. This would equate to just one or two dwellings. Denser development consisting of more dwellings would not be suitable as this would have a detrimental impact on the landscape and setting of the village.</p> <p>As there are already existing dwellings (only included due to their location between the confines and The Vineries) and planning permission for redevelopment of the demolished building (The Vineries) has been granted, there is little scope for further development. This is because the remaining land would be on the extremities of Ash and development here would be detrimental to the setting of Ash and on the wider landscape.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code SHL018	Address Land between Woodnesborough Lane & Sandwich Road	Parish Eastry	Overall SHLAA Score 34.00 (6-10 years)	Area 1.53Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site to the east of Woodnesborough Lane, consisting a residential property, 1 Great Walton Cottages (located in the south western corner), farm buildings (on the western side of the site) and associated land (remaining area). Although the site appears to be flat, it rises gently in a northerly direction. There are very limited views of the site given that any views from the public highway are blocked with a thick line of trees (from both Woodnesborough Lane and Sandwich Road). The line of trees runs around the western, northern and eastern boundaries.</p> <p>The surrounding uses consist of residential (to the south and west), farm land to the north and a manor house Great Walton (and grounds) to the east.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>Aside from a small area of land associated with 1 Great Walton Cottages, the site is located outside of the Village Confines. The western and southern boundaries abut the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>Great Walton is a Listed Building and is located immediately to the east of the site (but accessed from Sandwich Road). Development of this site would have a serious detrimental impact on the setting of this historic asset through the loss of open space, which is as important as the building itself.</p> <p>There is potential for archaeological remains as Woodnesborough Lane is along the line of an old Roman Road. If development was to take place, the site should be investigated for archaeology in the first instance.</p>				
<p>Landscape Impact</p> <p>The location of the site is one of transition between quite dense housing of differing ages and larger open areas, including a sizeable listed property. The site is screened with trees from both Woodnesborough Lane and Sandwich Road., however clearance in recent years has increased visual permeability from Poison Cross. There would be the potential with suitable boundary treatment to reduce the visual impact to an extent that development would appear as an extension to the existing built form.</p>				
<p>Biodiversity</p> <p>Biodiversity and bat surveys would be required to be undertaken by the developer before any development could take place.</p>				
EIA Screening: required due to size			Appropriate Assessment: contribution to the Thanet Coast Mitigation Strategy would be required.	
Green Infrastructure				

<p>The site is isolated and it is not possible to create further recreational walking links. There are concerns about surface water flooding, given the topography and access to Woodnesborough Road. SUDs should be incorporated and this could reduce the potential dph.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>An acceptable vehicle access can be created but the boundary fencing will need to be removed in order to obtain adequate sight lines. There are no continuous footways to the centre of the village.</p> <p>The wider road network could accommodate any additional traffic from the development.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>The nearest bus stop is less than a ten minute walk from the site (route 14, on Lower Gore Lane to the north west of the site, hourly to Sandwich and Deal). The SHLAA score reflects the fact that the GP Surgery is located within a ten minute walk from the site, whilst the Primary School is a slightly longer walk – just over ten minutes.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is well contained behind existing vegetation (limited development would have little impact on the wider landscape) and is within walking distance of public transport and a Doctors surgery. A suitable vehicular access to the site would also be achievable but this would result in the removal of vegetation. Development (including a new access and the removal of vegetation) would, however, have a detrimental impact on the setting of the Listed Building and the rural character in this area. The site is, therefore, considered unsuitable for further development.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code NS01EAS	Address Land Adjoining Walton Cottages, Woodnesborough Lane	Parish Eastry	Overall SHLAA Score 29.5 + 15 Years	Area 2.96 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Rectangular shaped site consisting of a manor house, Walton House, and its grounds (consisting of a smaller formal garden to the south and larger informal 'park' to the north), located on the eastern side of Eastry. The land falls gently to the north. The site also includes four terrace houses (Walton Cottages) and a detached house (Gordon Lodge) that front onto Sandwich Road (located in the south western corner of the site).</p> <p>There are mature trees located to the south of the site adjacent to Walton House, delineating where the formal and informal gardens meet. Mature trees are also scattered across the main grounds. The boundary line consists of trees and/or scrub to the west and east. There is no physical boundary line to the north as this has been drawn across the open 'park land' area.</p> <p>There are residential properties immediately to the south and (on the opposite side of Sandwich Road) west of the site. To the east and north there is grazing or agricultural land.</p>				
Policy Alignment SHLAA Score: 1.0 – Outside development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park outside development envelope and non-housing designation.				
The site is located on the edge of the settlement, outside the confines. The site is, however, adjacent to the confines on the western and southern boundaries. The majority of the site also falls within the Eastry Conservation Area. Only a very small strip of land to the north is outside of this designation.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
<p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The majority of the site falls within the Eastry Conservation Area. Walton House is also a Listed Building and is a manor house set in open grounds. If any development were to be permitted, the unique character of this building and its setting would be lost. It would also seriously detract the approach to Eastry, destroying the character of this area. Development of this site would, therefore, have a detrimental impact on the setting of the Listed Building and on the Conservation Area.</p>				
<p>Landscape Impact</p> <p>Walton House presents a good example of a country house in an agrarian setting, with small formal garden opening out onto (albeit limited) a sheepwalk landscape beyond. The site is located on the edge of Eastry on land that rises to the south and provides a strong character to the village edge, counterbalancing the less imposing bungalow development on the other side of Sandwich Road. Although the trees to the roadside would provide some screening, development at this scale would have a detrimental impact on the setting of Eastry and would intrude into the wider landscape.</p>				

Biodiversity

The site may well support bats, both roosting in the buildings, or mature trees and using the gardens and fields for foraging. This may be a constraint to development. Common reptiles are likely to be widespread. A full biodiversity assessment would have to accompany any application.

EIA Screening: necessary due to size

Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary and screening would also be necessary to consider extra impact at Sandwich Bay.

Green Infrastructure

PRoW footpath EE251 runs along the eastern boundary to join with footpath EE24, north of the site, forming a significant part of paths linking Eastry to Felderland. Development here could enhance this linkage. The topography would suggest that swales could be used for SUDs. Biodiversity interests are unlikely to be enhanced through development and there would be a degradation of the landscape which would outweigh any other gains.

Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site

A safe access onto the site would be achievable onto Sandwich Road. Any trees or scrub would have to be removed to ensure the correct sight lines could be achieved. The site is within a 30mph zone.

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

The site is adjacent to a bus stop along Sandwich Road (the 88/89 hourly service to Dover and Sandwich). A Doctor's surgery is located in the High Street, and Eastry CoE primary school is located to the west of Eastry off Cook's Lea. These are all within five minutes walk of the site.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 4.5 - Single Private Ownership

Analysis

The site is within five minutes walk of public transport, a GP surgery and a school. Vehicle access would also be achievable with the removal of trees and PRoW links could be enhanced through development. There would, however, be a detrimental impact on the setting of the Listed Building, Conservation Area and wider landscape. These detrimental impacts would outweigh the other positive aspects of this site.

Consideration for inclusion in the Submission Document?

No

Site Code SHL094	Address DDC owned site – Boystown Place, Eastry – Land either side of entrance off Sandwich Road	Parish Eastry	Overall SHLAA Score 32 (6-10 Years)	Area 0.2ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 6
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Council maintained rectangular open space consisting of grass lawn (on the eastern side of the site) and trees and shrubs (which are located to the west) located within a predominantly residential area. Boystown Place consists of 1960s/70s bungalows.</p> <p>The site has a road frontage on three sides (Sandwich Road to the west and Boystown Place to the north and east). The site is situated on a plateau with steep banks to Sandwich Road (approximately 3m above the road) and to Boystown Place (reducing in height to the south east corner). There is a fenced square shaped area within the site, located on the eastern edge, for a substation.</p>				
<p>Policy Alignment SHLAA Score: 2.0 – Within or partially within development envelope, fully within open space or statutory nature reserve or green wedge, green corridor, or historic park</p> <p>The site is designated as open space and the site is within the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, residential development would be appropriate in this location.</p> <p>Historic Environment</p> <p>The site is within the Eastry Conservation Area and there is a Listed Building (The White House) located west of the site. The open space, with the mature trees and hedgerows, contributes to the special character of the Conservation Area and the setting of the Listed Building (partitioning it from the modern bungalows in Boystown Place). Development of the whole site would, therefore, have a detrimental impact on the Conservation Area and Listed Buildings. Development on the frontage of Boystown Place would also have a detrimental impact on the existing townscape due to the difference in height (development would overlook existing bungalows) and with the introduction of residential related paraphernalia, such as fencing and sheds, that could be viewed from Sandwich Road.</p> <p>Landscape Impact</p> <p>The site is located in an area of transitional character where the denser form of the village centre starts to give way to a mix of dwellings, open space and trees. Boystown Place is major contributor to this character. Retention of the screening to Sandwich Road is important in maintaining the transitional character of this part of Eastry,</p> <p>Biodiversity</p> <p>There could be nature conservation interest related to the trees (bats) and common reptiles may use the site margins. If development were considered to be acceptable then a Biodiversity scoping study would have to be undertaken by the developers as part of any planning application. Appropriate action would be necessary as part of any planning application.</p>				

EIA Screening: too small to be needed	Appropriate Assessment: too small to be needed.
<p>Green Infrastructure</p> <p>Currently the site provides a pleasant open space for the residents of Boystown Place, but views from Sandwich Road are limited by tree and shrub cover. Development would not add to GI.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>An acceptable vehicle access could be created from the eastern side of the site along Boystown Place but the bank would have to be lowered to road level to achieve this. Access onto Sandwich Road, to the west, and the northern side would not be acceptable due to the steep banks and junction spacing.</p> <p>The site benefits from having footpaths leading to the centre of Eastry and the wider road network could accommodate any additional traffic resulting from the development.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>The site is within five minutes walk of bus stops for the hourly service to Sandwich and Dover (87/88). The site is also five minutes walk away from the Eastry C of E Primary School and the Doctors Surgery on the High Street along with a number of local shops.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>The site benefits from being located close to local services and a suitable vehicle access could be achieved on the site to the east. The site, however, contributes to character of the Conservation Area and setting of a Listed Building through its open space and tree coverage. This would be lost if developed. The site is also designated as open space. Development would also have a detrimental impact on the townscape in this area and there is a sub station located on the site, which would restrict the developable part of the site.. The site is, therefore, not considered suitable for development.</p>	
<p>Consideration for inclusion in the Submission Document? No</p>	

Site Code SHL059 & EAS02	Address Land off St. Mary's Close Eastry Court Farm	Parish Eastry	Overall SHLAA Score 39.50 (0-5 Years)	Area 1.13 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>Irregular shaped site consisting of disused farm buildings, including a large shed in the centre and silos to the west of the site. The site also has a hard standing, which circles the large farm shed and has been infiltrated by weeds. There are two properties (Eastry Court Cottages) included within the site and a further five properties outside but which have to cross the site for access. A small part of the site is included within the Conservation Area. There are three access points onto the site but only one has been included within the site boundary. The site has mature trees located to the south of the site.</p> <p>EAS02 has a smaller site area than SHL059 and was identified as suitable development or 5 units in the Preferred Options Document. This site excludes Eastry Court Cottages and associated land. These properties are included within SHL059.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The western boundary abuts the confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The existing access road is within a Conservation Area and passes a Listed Building. Development of the site and any subsequent improvements to the road to adoptable standards would be likely to harm the character of the Conservation Area and setting of the Listed Building. The traditional barns to the north west of the site may offer potential for conversion to residential subject to considerations of bat roosts.</p> <p>The site was considered for housing at the Local Plan Inquiry into objections to the Dover District Local Plan (1998). The Inspectors Report the following year concluded that residential development at the farm would likely to have an urbanising impact, which would be at odds with the rural character of the site and the attractive wider environment.</p> <p>The site has a high potential for archaeological remains associated with the development of Eastry. Pre-determination evaluation would be necessary to determine whether development is possible within the site.</p> <p>Landscape Impact</p> <p>The location of site is between the newer infill development of Boystown Place and the larger properties in spacious grounds associated with St Mary's Church which reflects the landscape history of Eastry. Any development must be sensitive to this. The site is contained by development, except on its north east boundary, which is open to long distance views. Development here could be detrimental to the setting of Eastry and its church.</p> <p>The Local Plan Inspector concluded in his Report (in 1999) that the whole farm complex relates visually to the open countryside rather than the built up area to the north west and west.</p>				

Biodiversity

There could be bats, owls and common reptiles on site so a survey would be required as part of any planning application. Mature trees would also need to be retained (some would be protected by the Conservation Area designation). The presence of two ponds (Brook Street) within 300m of the site without any significant intervening barriers to movement suggest that a Habitat Suitability Index survey for great Crested Newts is required.

EIA Screening: necessary due to size

Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be required.

Green Infrastructure

Footpath EE251 runs along the western boundary, but is outside of the site. An important footpath, EE 254, runs from the corner of the development site along Church Street and through St Mary's churchyard meeting the current farm access to the site on Brook Street. Essentially, this obviates the need for any further recreational walking GI that development could provide. The site is already under a considerable area of concrete, thus development would not generate any significant increase in surface water flood risk and if development were to generate more green space (gardens etc.), depending on findings with regards to bats and owls, there could be minor biodiversity benefits. Overall, the site is GI neutral.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

There are two points of access to the site, one off Church Street (in the south western corner) and one off Brook Street (to the north east). Both are unadopted, narrow, single car width and already serve seven existing properties.

Kent Highways would not support the use of both accesses as this could lead to 'rat running' through the site and there is concern that the existing sight lines at the junction with Church Street, the preferred access, are not sufficient. Any developer would also need to demonstrate that any new development would not increase the traffic movements above that of the existing farm (assuming it was still operational).

Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school

The site is within five minutes walk of bus stops for the hourly service to Sandwich and Dover (87/88). The site is also five minutes walk away from the Eastry C of E Primary School and the Doctors Surgery on the High Street. The High Street is also the location of the local shops.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost**Ownership** SHLAA Score: 4.5 – Single Private Ownership**Analysis**

The site is located close to the centre of Eastry with a range of local facilities and is within an appropriate Flood Zone for residential development. The site is also falling into disrepair.

The site is, however, located in a particularly sensitive location where higher density development & improved access would have a detrimental impact on the setting of Listed Buildings, Eastry Conservation Area and the village in the wider landscape. All these issues have been reasons for refusals in the past for development by Planning Inspector.

Although the site is in a sensitive location there may, however, be an opportunity for limited development on part of the site, consisting of the conversion of farm buildings to the west and some new development on the footprint of where the main barn is situated, avoiding the northern boundary and retaining the trees to the south and east. The area identified in SHL059 would, therefore, not be suitable in its totality. Any development would, however, be subject to suitable evidence that the vehicle movements did not exceed that of the farm and that the relevant surveys

for wildlife and archaeology were undertaken.

As there would only be limited development on this site, there are three options to consider that would enable this. The first option would be to leave the site outside of the Settlement Confines and rely upon Policy DM4 (reuse or conversion of rural buildings) in the Adopted Core Strategy. This would enable the conversion of the existing building but not the large central barn (this would not be suitable for reuse or conversion and so DM4 would not apply).

The second option would be to change the Settlement Confines to include this site and rely upon Development Management process to produce a suitable scheme. This could include the large barn and enable redevelopment of this site but would not provide any guidance and would not be included in the overall housing numbers.

The third option would be to change the settlement confines and produce a criteria based policy to guide development.

As this is a sensitive location it is considered that the third option would be most appropriate.

Consideration for inclusion in the Submission Document?

Yes

Site specific policy to reflect importance of Conservation Area, archaeology, access, landscaping and Great Crested Newt, bat and owl surveys.

Site Code EAS01	Address Land to the east of Dover Road.	Parish Eastry	Overall SHLAA Score 30 (11-15 Years)	Area 6.08 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Irregular shaped, open, agricultural field, located to the south of Eastry. The site rises to the north east. The site is screened along the eastern boundary by mature trees and existing dwellings at Eastry Park and by a woodland to the south. Country lanes run along the northern, southern and western boundaries, where there are some hedgerows. The site is divorced from the Eastry but is adjacent to Buttsole, a hamlet (located to the south of Eastry).				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is approximately 145m from the Settlement Confines.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment The Eastry Conservation Area is only 100m away from the site, with only farmland separating the site from the designation. There are no Listed Buildings within or adjacent to the site. The site is disconnected from the core of Eastry and would not form an acceptable type of expansion to the village. Development would, therefore, have a detrimental impact on the setting of the village. The site lies within 100m of a scheduled ancient monument and is adjacent to a Roman Road, so there may be considerable archaeological interest on the site.				
Landscape Impact The location of the site to the south of Eastry in a rural landscape with sporadic houses. The site rises to the east but is not readily viewed from the north, east and south but it is exposed to medium to long distance views from the west. Although there are ribbons of residential development to the east and west, the overall character of this site is open countryside and contiguous with that to the west. Development of this site would harm the overall character of the countryside in this location. The site also lies beyond the 'entrance' to Eastry at Buttsole and development would harm the setting of Eastry.				
Biodiversity Any interest would be restricted to boundary hedgerows and trees. Although currently agricultural land there could be potential to improve the biodiversity interest as the slope and aspect would be suitable for swales associated with SUDs. The proximity of Buttsole Pond indicates that a Habitat Suitability Index survey would be necessary.				
EIA Screening: necessary due to size.			Appropriate Assessment: necessary both to contribute to the Thanet Coast SPA Mitigation Strategy and be assessed on its own potential impacts on the SPA/Ramsar site.	

Green Infrastructure	
A PRoW, footpath EE259 bisects the site and another footpath, EE 258 follows the northern boundary.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The combination of existing junctions and restricted visibility make it extremely difficult to achieve a satisfactory access to this site, especially bearing in mind the potential volume of development that this site would be capable of accommodating. In addition, the pedestrian link into the village is poor as there is no footway to the site's road frontage, this is likely to encourage car use.	
Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school	
There are bus stops located adjacent to the site (87/88, hourly to Dover and Sandwich). The nearest point of the site is approximately 500m way from the Doctors surgery and 870m away from Eastry C of E Primary School. The site is, however, in a location approximately 145m away from the Settlement Confines where there is poor footway linkages.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Although the site is within Flood Zone 1 and would be sequentially preferable in flood risk terms, the site is physically divorced from the village settlement confines and, if developed, would not represent an acceptable expansion of the village. Development would also have a detrimental impact on the countryside. The combination of existing junctions and restricted visibility would also make it extremely difficult to achieve a satisfactory access to this site.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL064	Address Eastry Hospital, Mill Lane	Parish Eastry	Overall SHLAA Score 41.0 (0 – 5 years)	Area Indicative No. of units @ 30 dph =
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Irregular shaped site located on the southern edge of Eastry. The use as a hospital ceased some years ago and the site has been cleared of all but three structures, the two former hospital buildings and the chapel. Apart from the retained buildings, located to the north of the site, the site is generally featureless, sloping gently down to the south-eastern corner. A number of trees on the site are covered by a tree preservation order.</p> <p>To the north of the site there are residential properties along Mill Lane. To the west there is a care home and housing off White Wood Road a relatively modern residential development. The eastern boundary abuts the rear gardens of older properties fronting Lower Street, where there are a number of Listed Buildings. To the south of the site there are agricultural fields.</p> <p>The site has been subject to a 2009 planning application, which the District Council made a resolution to grant planning permission for 80 dwellings, office and community uses.</p>				
<p>Policy Alignment SHLAA Score: 10.0 – Designation as a housing allocation site and within a development envelope (settlement boundaries)</p> <p>The site is located inside the Settlement Confines and is subject to a 2002 saved Local Plan policy for mixed use development (including 40 dwellings).</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The District's SFRA indicates that the site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The building fronting Mill Lane is a former work house and is a Grade 2 listed building. The former chapel, which is located to the west of it, and the remains of the main hospital building, to the south, are not listed but fall within the curtilage of the listed building. The frontage of the site, including the chapel and the former work house, is within the Eastry Conservation Area.</p> <p>The buildings have been empty for several years and are of a very poor state of repair. Consequently there is a need to find alternative suitable uses for them to conserve and enhance their special character. The application sought to use these buildings as serviced office accommodation and this was supported as the use allowed most of the original rooms to be retained and works with the grain of the buildings, keeping the essential character of the buildings and limiting the loss of the historic fabric. Retaining the historic fabric may not be possible with a residential use.</p> <p>The spaces between these buildings, which are also within the Conservation Area, are also important for the character of the area and should be retained and enhanced as part of any development.</p> <p>Landscape Impact</p> <p>The local landscape was dominated by the nurses quarters, but with demolition of this, the character of the site has diminished except for views from Mill Lane. The site, on rising ground, needs careful design in order to ensure that development does not further erode the character of the area.</p> <p>Biodiversity</p>				

<p>There may be some biodiversity interest in the hedgerows and these would need to be retained/enhanced as part of any development. The site probably supports common reptiles. Retained buildings will require a bat survey due to the passage of time since last survey.</p>	
<p>EIA Screening: necessary due to size</p>	<p>Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be needed.</p>
<p>Green Infrastructure</p> <p>A footpath, EE256, runs along the southern boundary of the site and there should be a link from this through the site to Mill Lane to improve pedestrian links. The site is very suitable for SUDs, which if carefully designed in could provide a soft transition to the countryside.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The existing access would be suitable for development and, as demonstrated through work on the planning application, the wider road network could accommodate the traffic generated.</p> <p>A safe pedestrian route from the new dwellings to the amenities in the village should also be provided.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>The site is located approximately 100m away from the nearest bus stops (No.14, hourly to Deal and Sandwich) on Mill Lane. There are also bus stops on the High Street (the 87/88 hourly service to Dover and Sandwich). The Doctors surgery is approximately 260m away from the site. The local shops would be a little further.</p> <p>Eastry C of E Primary School is approximately 200m away from the site' as the crow flies', but would be further if footpaths were to be followed.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 5.0 – Single Public Sector Ownership</p>	
<p>Analysis</p> <p>The site is located in a sequentially preferable location, close to local facilities and a suitable access can be achieved.</p> <p>The principle of residential development on the site has also been established through a 2002 saved Local Plan policy for a mixed use scheme including 40 dwellings, office space and community uses. The restriction to 40 dwellings was identified due to concerns with highway aspects of the site but the recent planning application has demonstrated that 80 dwellings are acceptable. The demand for the employment use is uncertain however and the results of the Employment Land Review will have to be a consideration as to whether this should still be part of the revised allocation.</p> <p>To ensure that the character of the wider landscape and the setting of the village is not eroded any proposals will need careful design.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Bat survey required Improved pedestrian links SUDs</p>	<p>Yes</p>

Site Code NS02EAS	Address Works to the rear of Coronation Cottage, Mill Lane	Parish Eastry	Overall SHLAA Score Not Scored	Area 0.23 ha
		Hierarchy Local Centre		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>Irregular shaped site located in the southern part of Eastry. The site consists of a former light industrial/ distribution unit and hard standing (and would be classed as previously developed land). There are residential properties to the east and south of the site. To the west there is grassland with mature trees and to the north there is a sports field. There appears to be a hedgerow along the northern and western boundaries.</p> <p>There are two access points to the site, one off Mill Lane and the other is off Wheelwrights Way.</p>				
Policy Alignment SHLAA Score:--				
<p>The access road to the site is within the Settlement Confines. The majority of the site is, however, outside of the Settlement Confines but the eastern and southern boundaries abut them. The site was an employment use and Policy DM2 in the adopted Core Strategy would therefore also apply.</p>				
Physical Constraints SHLAA Score:--				
<p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>Although there are no Listed Buildings within or abutting the site, the Eastry Conservation Area is approximately 11m from the eastern and southern boundaries of the site. The nearest Listed Buildings are approximately 70m from the entrance of the site.</p> <p>The site is industrial in appearance and development, through appropriate design could help improve the setting of the Conservation Area.</p> <p>Landscape Impact</p> <p>The site is well contained on the edge of an urban area with only low visibility from Mill Lane. Redevelopment would have no significant impact on the landscape.</p> <p>Biodiversity</p> <p>The biodiversity of the site will be very limited and restricted to the boundaries.</p>				
EIA Screening: too small to be needed		Appropriate Assessment: too small to be needed		
<p>Green Infrastructure</p> <p>The site is part of a cul-de-sac. Development would enable the creation of a new pedestrian access to Gun Park, which would increase the recreational walking routes within Eastry village.</p>				
Proximity to Road Network SHLAA Score:--				
<p>The site has two current access points. The main access is off Mill Lane, the secondary access is off Wheelwrights Way (a cul-de-sac off Mill Lane). The Mill Lane access runs between residential properties and is opposite the access point for Eastry Hospital, which has had a resolution to grant planning permission for 80 dwellings.</p> <p>It would probably be appropriate to develop the two means of access and have 2no. private drives,</p>				

neither of which should exceed 5no. properties. This negates the need for the access road to be laid out to an adoptable standard. The access onto Mill Lane could remain much in its present form and serve 5 dwellings subject to surface water not being discharged onto the public highway.

Access to Services SHLAA Score: --

The site is located approximately 130m away from the nearest bus stops (No.14, hourly to Deal and Sandwich) on Mill Lane. There are also bus stops approximately 250m away on the High Street (the 87/88 hourly service to Dover and Sandwich). The Doctors surgery is approximately 350m away from the site. The local shops would be a little further.

Eastry C of E Primary School is approximately 100m away from the site as the crow flies, but would be approximately 700m away if footpaths were followed.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site is located close to local facilities, within the sequentially preferable Flood Zone 1 and on brownfield land. The demolition of the industrial unit and appropriately designed dwellings could also enhance the setting of the Conservation Area. A suitable access could also be achieved.

Development would, however, result in the loss of employment land. It is proposed that the Settlement Confines be amended to allow development if the relevant marketing (required by Policy DM2) has proven unsuccessful.

Consideration for inclusion in the Submission Document?

Yes

Change of confines.

Site Code SHL028 (EAS03C)	Address Land adj to Thornton Lane, Eastry	Parish Eastry	Overall SHLAA Score 31.0 (11-15 Years)	Area 5.76 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Large irregular site consisting of multiple uses (storage, open fields, tree surgeon and residential (The Pines)) located at the south eastern corner of Eastry. The land is generally flat, being located on a broad ridge but the land drops rapidly to Thornton Lane to the west of the site. There are hedgerows around the boundary and across the site reflecting the land uses.</p> <p>The site has open countryside to the south, east and west of the site. To the north there are residential properties.</p> <p>The site was originally submitted for a Settlement Confine change during the first call for sites during the informal Issues and Options stage (original reference EAS03C). Another area of land (EAS02M) was also submitted at that time for mixed use, which was located to the south but overlapped with this site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is located outside of the Settlement Confines. The northern and part of the western boundary about the confine.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Conservation Areas within or adjacent to the site. There are four Listed Buildings adjacent to the site; 7 & 8 Heronden Road, 'Tewkesbury' and 'Eastry Mill' on Mill Lane.</p> <p>Development, whether the whole site or part of the site adjacent to the existing confines, would have a detrimental impact on the setting of the Listed Buildings, especially Eastry Mill which is a prominent landmark feature located on the edge of the countryside.</p> <p>Landscape Impact</p> <p>The area contains a mixture of farming and commercial uses. It performs a transitional role between the built up part of the village and the open countryside.</p> <p>The area is on a broad ridge but contained by hedgerows and trees. There may be scope for development of the northern part as this would not unduly harm the transitional character of the area. Development further south would be more exposed to the wider countryside and would be reliant on a third party tree line to screen views and this could only be partially effective.</p> <p>Biodiversity</p> <p>The grassland, hedgerows and trees may have nature conservation interest, in particular small mammals and common reptiles. Bats may utilise the site for flight lines and foraging areas. Ecological surveys would have to be part of any EIA.</p>				

EIA Screening: necessary for whole site, or any substantial part of it.	Appropriate Assessment: Contribution to the Thanet Coast Mitigation Strategy would be required and if the whole site were to be developed, site specific screening may be required.
<p>Green Infrastructure</p> <p>The site has a PRow footpath EE256 running in an interrupted fashion along the northern boundary. Development of the northern part of the site could enable enhancement of this footpath. Development of the whole site would require consideration of open space provision, potentially allied to SUDs.</p>	
<p>Proximity to Road Network SHLAA Score: 4.0 – Access investment required in an urban area including site visibility</p> <p>This proposal needs to be considered as additional to the existing Local Plan proposals for Eastry Hospital (for which there is a resolution to grant planning permission). There is considerable concern that this additional level of development could not be accommodated on the existing road network. Vehicular access to the site is poor and the junctions of Thornton Lane, Liss Road and with Mill Lane would require substantial improvements to bring them up to an acceptable highway standard (this would also require third party land). Liss Road would also have to be widened. An acceptable vehicle access, therefore, cannot be created.</p>	
<p>Access to Services SHLAA Score: 3.5 – Site within 10 minutes walk of bus, GP surgery or school</p> <p>The site is located at the south western end of Eastry. There is a bus service (No.14, hourly to Deal and Sandwich) running along Mill Lane and the school is approximately 700m from the nearest point of the site. The main village centre, with the Doctors Surgery and local shops, is also approximately 700m away from the nearest point of the site.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located within 10 minutes walk from local facilities and the site is within Flood Zone 1 (sequentially preferable in flood risk terms). From a landscape and nature conservation perspective there is scope for carefully limited development in the northern parts of the area. Development of the whole area would, however, have an unacceptable impact on the landscape.</p> <p>Any development (even a smaller area) would, however, have a detrimental impact on the setting of the adjacent Listed Buildings, especially Eastry Mill. The access is also unacceptable and the road network leading to the site would require substantial improvements. Despite the positive aspects of this site, overall it is considered that the poor access and detrimental impact on the historic assets make this an unsuitable site for further development .</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code EAS02M	Address Land adj to The Pines, Thornton Lane	Parish Eastry	Overall SHLAA Score Not scored	Area 2.25 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score:				
<p>Description of Site</p> <p>Large irregular shaped site previously used as a concrete works and includes a large industrial unit (to the north), hard standing for storage/parking and undeveloped land (to the south). There is a residential property located at the centre of the site but this is excluded from the site. The site has been suggested for mixed use development.</p> <p>The site is located on a broad ridge but the land drops rapidly to Thornton Lane to the west of the site. There are hedgerows around the boundaries of the site. Access to the site is off Thornton Lane, to the south of The Pines. The Pines has a separate access.</p> <p>The northern part of the site (including The Pines) has also been included within site SHL028.</p>				
Policy Alignment SHLAA Score:				
<p>The site is located outside of the Village Confines. The confines are 95m from the nearest part of the site.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
Flood Risk				
<p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p>				
Historic Environment				
<p>There are no Conservation Areas or Listed Buildings within or adjacent to the site.</p>				
<p>Any residential development on this area of land would intensify the built form, which would be divorced from the rest of the village.</p>				
Landscape Impact				
<p>The site is in a prominent position on a ridge but is partially screened by boundary vegetation and a third party hedge line to the east, limiting views from that direction. From a more southerly perspective, the third party hedge line becomes increasingly important, but the site diminishes rapidly from receptors such as the A256 and there are no PRoW footpaths etc. that need to be considered. The site is screened from the west by a bank and substantial scrub.</p>				
<p>Sensitive development with adequate landscape buffering would probably overcome existing adverse impacts.</p>				
<p>A previous planning application (DOV/03/0924), for an extension to the residential property, The Pines, was refused and an appeal dismissed because it would create an impression of substantial bulk far greater than that of the existing building, which would not conserve or enhance the character and appearance of the surrounding area.</p>				
Biodiversity				
<p>The south western part of the site has been identified as having a grassland interest. The previously developed land could be of interest for reptiles. The site might provide a foraging area for bats.</p>				
EIA Screening: if site is greater than 0.5 ha, screening is necessary			Appropriate Assessment : if the site is greater than 0.5 ha, a contribution to the Thanet Coast	

	Mitigation Strategy would be required.
Green Infrastructure	
The site is isolated and has no nearby footpaths. In GI terms it would be neutral as long as biodiversity connectivity was maintained to vegetation along Thornton Lane.	
Proximity to Road Network SHLAA Score:	
This proposal needs to be considered as additional to the existing Local Plan proposals for Eastry Hospital. There is considerable concern that this additional level of development could be accommodated on the existing road network. Access along Thornton Lane and the junctions of Thornton Lane and Liss Road and with Mill Lane would require substantial improvements and Liss Road would have to be widened.	
Access to Services SHLAA Score:	
The site is located at the south western end of Eastry. There is a bus service (No.14, hourly to Deal and Sandwich) running along Mill Lane (approximately 400m away) and the school is approximately 890m from the nearest point of the site. The main village centre, with the Doctors Surgery and local shops, is over one kilometre away from the nearest point of the site.	
Market Attractiveness SHLAA Score:	
Ownership SHLAA Score:	
Analysis	
Although the site is previously developed land and within flood Zone 1 (sequentially preferable in terms of flood risk) the site is not well related to the village and local facilities, the road network leading to the site would require substantial improvement and there would be a detrimental impact on the wider countryside. The site is, therefore, considered to be unsuitable for development.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL024 & SHL025	Address The Old Chalk Pit, Heronden Road, Eastry	Parish Eastry	Overall SHLAA Score 33.5 (6-10 Years)	Area 0.45Ha & 0.68Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 13 & 20
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Two rectangular shaped sites located at the far south eastern corner of Eastry, considered together due to their location and their close proximity with one another. The northern site (SHL025) is located within an old chalk quarry, which has been excavated into the side a bank. This site it is flat and is enclosed by vertical sides on the eastern and southern boundaries reflecting the past excavation. The site consists of a road haulage firm and a smaller industrial unit. The access to this site is to the north west where the site is level with the Heronden Road.</p> <p>SHL024 consists of agricultural land that retains the line of the original topography, which rises to the west from the east. There is, therefore, a considerable drop between the north eastern corner of this site and the south eastern corner of the excavated SHL025. There appears to be an access onto the site at the north western corner (from SHL025), where this site and SHL025 are at the same level. There is no line or feature delineating the southern boundary line.</p> <p>There is farmland to the south, east and west of both sites. Thornton Lane runs along the eastern boundary and there is a dismantled railway line along the western boundary. Stumps Court Cottage lies to the west of SHL024. The northern boundary of SHL025 is adjacent to residential. Pylons cross both sites from north to south.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The northern tip of SHL025 is within the confines, the majority of the site is, however, outside. SHL024 is outside the confines and does not abut them.</p> <p>The site was an employment use and Policy DM2 in the adopted Core Strategy would, therefore, also apply.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The sites are within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Buildings are located 100m to the north of SHL025 (7 & 8 Heronden Road). Development would not have a detrimental impact on the setting of these historic assets.</p> <p>Landscape Impact</p> <p>SHL025 is very discrete being in a hedge-lined cutting and is previously developed land with existing buildings. If sufficient tree screening was retained and an appropriate boundary to the south created, the overall impact would be minor.</p> <p>SHL024 appears to be based on the squaring off of the curtilage of Stumps Court Cottage, which has little justification. The southern part of the site is on sloping farmland with no screening to the south. There would be an adverse impact on the setting of Eastry if the southern part of the site were developed.</p>				

Biodiversity	
The long linear hedge lines are probably of importance for bats. There would be potential for woodland planting. There is potential for other biodiversity interest at the far end of the chalk quarry.	
EIA Screening: Too small	Appropriate Assessment: Too small
Green Infrastructure	
There are no public footpaths close to this site. In GI terms it would be neutral.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
Whilst there are concerns with the existing entrance, due to the curvature of the road, the site is currently used as a road haulage depot so it is likely that development of the site would have lower traffic movements than the current use.	
Access to the agricultural land onto Thornton Lane would not be suitable due to the width of the road and the unsuitable junction between Thornton Lane and Heronden Road.	
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk	
The bus stops for the 14 service (hourly to Deal and Sandwich) are approximately 330m away from the site on Mill Lane and Gore Lane. Eastry C of E Primary School is approximately 500m away from the site.	
The GP surgery and the centre for Eastry (with a range of services) are just over a kilometre away.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Both sites are located within the sequentially preferable Flood Zone 1 and, despite been on the periphery of the village, are within 10 minutes walk of public transport and a local school. Development would also not have a detrimental impact on the setting of any heritage assets.	
There may be a possibility for development within the chalk pit (SHL025) as this is well contained and development would not have a detrimental impact on the wider landscape. Traffic movements would also have less of an impact than the existing freight service. There is, however, an existing use which is unlikely to move within the next five years. This site could accommodate approximately 20 dwellings	
Development of SHL024, would, however, have a detrimental impact on the wider landscape and it is considered that an access to the site would be unsuitable due to the narrow rural lane and the existing junction. For these reasons this site is not considered suitable for development.	
Consideration for inclusion in the Submission Document?	Yes
SHL025 only Phasing should be after the five year period / change of confines	

Site Code SHL022	Address Land at Heronden Road, Eastry	Parish Eastry	Overall SHLAA Score 26.50 (Undeliverable)	Area 2.83 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located on the edge of the village, which occupies the south eastern portion of a much larger agricultural field. The land rises to the east where there are residential properties (there is also change of height at this boundary with the houses higher than the field). These properties are screened by a line of trees (which are protected by Tree Preservation orders). A track runs along the northern boundary and the southern boundary follows the line of Heronden Road, which curves. There is no feature or line delineating the western boundary.</p> <p>Pylons run down the eastern side of the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The eastern boundary of the site abuts the Settlement Confines.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The site lies approximately 150m from the Heronden Conservation Area. Development at the envisaged scale would have a detrimental impact on the setting of this designation. The open space between the two settlements is very important to the setting of the rural Conservation Area and for the separation of the two settlements, retaining their identities. Development would reduce the degree of separation, which would be to the detriment of the village (they would begin to merge with one another, losing their identity) and the Conservation Area.</p>				
<p>Landscape Impact</p> <p>The site is gently sloping ground running up to the east, to new properties on Mill Lane. There are no boundary features except the protected tree line to those new properties on Mill Lane. This boundary also demarks the line of dismantled East Kent Light Railway, although no other features remain. Development of this site would be highly visible in this location and any development would lend a very hard edge to the village.</p> <p>The impact on landscape character of the village edge would be damaging and would have a detrimental impact on the open countryside and long distance views.</p>				
<p>Biodiversity</p> <p>The site is currently used as arable. There may be some potential for farmland birds but this would have to be investigated. There is objection to the development of this site on biodiversity grounds.</p>				
EIA Screening: would be necessary due to size			Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be needed.	

Green Infrastructure	
A byway open to all traffic (EE109) runs along the northern boundary of the site. However, apart from this the site appears to be isolated in respect of GI and development would be neutral, apart from the impact on landscape and the ambience of the surrounding countryside.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
The site is considered to be unsuitable because a point of access would be difficult to achieve due to the curvature of the road and the restriction it would make to sight lines. The impact on surrounding junctions would also need to be assessed due to the potential size of the site.	
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk	
There are two bus stops approximately 200m away from the site, one on Mill Lane, the other on Gore Lane. Both serve the hourly No.14 bus service to Deal and Sandwich. The nearest bus stop is less than a ten minute walk from the site. The SHLAA score reflects the fact that the Primary School is located within a ten minute walk from the site, whilst the GP Surgery is a slightly longer walk at just over ten minutes.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis	
Although the site falls within the sequentially preferable Flood Zone 1 and is located within ten minutes walk from bus stops and the local primary school, it would be difficult to establish an access onto the existing road network due to the curvature of the road and the restriction it would make to sight lines. The wider highway network is also unsuitable for this size of development.	
Development would also have a detrimental impact and would be extremely visible on the wider countryside and the Heronden Conservation Area. For these reasons it is considered that the site is not suitable for further development.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL064	Address Gore Field, Gore Lane	Parish Eastry	Overall SHLAA Score 27 (Undeliverable)	Area 1.93ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular, flat site comprising of an open field on an edge of settlement location, with no natural boundary to the west. Existing residential properties are located to the south and east, with Gore Farm located to the north. The field is on raised ground approximately a metre above Gore Lane.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is located outside the Settlement Confines. The southern boundary and a small length of the eastern boundary abut the confines.				
Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3				
Flood Risk The District's SFRA indicates that the majority of the site falls within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment There are four Listed Buildings at Gore Farm, which are close to the northern boundary and have been converted. Development would only have a limited impact on the setting of the farm buildings. Any works on to the road resulting from development, such as the creation of a new access or road widening, could have a detrimental impact on the rural character of the area.				
Landscape Impact The site is on the edge of the settlement between social/former social housing and Gore Farm. A 'rural exceptions' social housing scheme has been developed to the east of the site. Landscaping, which is now well established, has been introduced along Gore Lane to screen this development. Development of this site would have a detrimental impact on the landscape as it would introduce a further urban form into the countryside. Visual impact from Gore Lane would be marked due to the level changes. It would be visible from Hammill, some 1.5 Km to the west, although this would be alleviated by the presence of a tree/scrub line associated with the old EK Light Railway.				
Biodiversity Limited biodiversity interest as it is an agricultural field. There may be some biodiversity interest in the hedgerows and these would need to be retained/enhanced as part of any development.				
EIA Screening: necessary due to size			Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be needed due to the size of the site.	
Green Infrastructure A PRoW footpath, EE252A, would provide a walking connection from the other side of Gore Lane to the centre of Eastry and to the Primary School. Development would adversely affect the current rural landscape, although it is a relatively heavily trafficked area. Development that would include gardens and landscaping could marginally increase biodiversity. Overall, the site should be considered neutral.				

<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>If the site was developed an acceptable vehicle access could be created onto Gore Lane. A new footpath would also be required along this stretch of road to link with existing footways. The wider road network could accommodate the trips generated by a new development of 57 houses.</p>								
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The nearest bus stop adjoins the site (route 14, hourly to Sandwich and Deal). The SHLAA score reflects the fact that the Primary School is immediately opposite the site, whilst the GP Surgery is a slightly longer walk – approximately ten minutes.</p>								
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>								
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>								
<p>Analysis</p> <p>The site is located within a Local Centre and is located close to bus stops and immediately opposite the local primary school, and an acceptable access could be achieved. Development would also only have a limited impact on the setting of the Listed Buildings to the north. Development would, however, have a detrimental impact on the wider landscape (although this would be alleviated by the presence of a tree/scrub line associated with the old EK Light Railway) and road improvements would change the character of the rural lane.</p> <p>In this instance, it is considered that detrimental impacts of landscape and character change in the road would not outweigh the positive benefits of development in this location. A contribution to the Thanet Coast SPA Mitigation Strategy would also be required due to the size of the site.</p>								
<table border="0"> <tr> <td data-bbox="131 1035 1218 1071">Consideration for inclusion in the Submission Document?</td> <td data-bbox="1218 1035 1490 1071" style="text-align: right;">Yes</td> </tr> <tr> <td data-bbox="131 1071 1218 1106">Boundary screening</td> <td></td> </tr> <tr> <td data-bbox="131 1106 1218 1142">A contribution to the Thanet Coast SPA Mitigation Strategy would be needed.</td> <td></td> </tr> <tr> <td data-bbox="131 1142 1218 1178">Footpath and road widening/passing places</td> <td></td> </tr> </table>	Consideration for inclusion in the Submission Document?	Yes	Boundary screening		A contribution to the Thanet Coast SPA Mitigation Strategy would be needed.		Footpath and road widening/passing places	
Consideration for inclusion in the Submission Document?	Yes							
Boundary screening								
A contribution to the Thanet Coast SPA Mitigation Strategy would be needed.								
Footpath and road widening/passing places								

Site Code EAS01C	Address Eastry Primary School, Cook's Lea, Eastry	Parish Eastry	Overall SHLAA Score 35.5 (6-10 years)	Area 1.45 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 3.0 - Fully occupied single use (e.g. factory, school)				
<p>Description of Site</p> <p>Rectangular site located on the western edge of Eastry, consisting of the school building and playing fields. There are residential properties to the north and southwest (rural exceptions affordable housing) and allotments to the south. There are agricultural fields to the west and playing fields to the east. The site is flat and enclosed to the north by mature hedge and to the west by protected trees. Gore Lane, which is set lower than the site, also runs along the western boundary. Access to the school is from Cook's Lea to the north of the site.</p> <p>The site has been requested to be included within the confines.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p>				
<p>The site is outside the Settlement confine but the northern boundary abuts it. The site is also designated open space so adopted Core Strategy Policy DM25 would also apply.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p>				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. There are Listed Buildings located approximately 100m to the north of the site at Gore Farm. There would be no impact from development on these historic assets.</p>				
<p>Landscape Impact</p> <p>As the site is flat and contained within hedgerows or trees, there would be little adverse impact as long as the protected tree screen to Upper Gore Lane was maintained.</p>				
<p>Biodiversity</p> <p>Biodiversity interest is likely to be limited but the school buildings may provide roosting spaces for bats. If the intention is to develop school was to be developed, a bat survey would be required, otherwise the site has little biodiversity interest.</p>				
<p>EIA Screening: necessary due to size</p>			<p>Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be needed.</p>	
<p>Green Infrastructure</p> <p>The site is currently excluded from GI, as it is a school site. However, housing development would not provide any extra benefit.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>If development was proposed after the confines were changed, access could not just be off Cook's Lea as this road already serves over fifty units. An emergency access would, therefore, be required from Gore Lane or Centenary Gardens. This would, however, require third party land (including the loss of allotments). Access directly onto Gore Lane would not be possible due to the change in land levels and</p>				

protected trees.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is the grounds of the Eastry C of E Primary School. The site is adjacent to bus stops for the 14 service (hourly to Deal and Sandwich). The GP surgery is within 10 minutes walk away. There are playing fields and play space adjacent to the site to the east and allotment gardens to the south.

Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

If the Settlement Confines were changed to include this site it would provide the opportunity for future development. The size of the site would also suggest that it would also be an allocation in the LAD.

The site is located in a good position in terms of access to local services and is located within Flood Zone 1, the sequentially preferable flood risk zone. The site, however, is restricted by highways issues. The current access is off Cook's Lea, which already serves fifty dwellings. To develop further dwellings would require a secondary access but this would appear not to be possible. There is, therefore, little benefit in changing the confines as the playing fields provide an important recreational asset associated with the school.

Consideration for inclusion in the Submission Document?

No

Site Code EAS05	Address Land to west of Gore Lane	Parish Eastry	Overall SHLAA Score Not scored as is a small site and change of confines	Area 0.09 Ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 3
Current Use SHLAA Score: --				
Description of Site Rectangular site located on the western side of Eastry consisting of two properties separated by an undeveloped area of trees. The site is screened by a substantial tree belt to the west and south and is contained by existing housing to the north and south. The site has two roads running along the eastern (Gore Lane) and southern (Hammil Road) boundaries. To the north and west there is agricultural land.				
Policy Alignment SHLAA Score: -- The site is adjacent to but outside the settlement confines. The eastern boundary is separated from the confine by the width of the road.				
Physical Constraints SHLAA Score: --				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment There are no Listed Buildings or Conservation Areas located within or adjacent to the site. The nearest Listed Buildings are approximately 120m south of the site (Gore Farm). Development at the site would be limited to no more than three units and these would be well contained within existing development and a belt of trees. Development at this scale would not have a detrimental impact on the setting of the Listed Buildings.				
Landscape Impact Although located on the edge of the village, the site is screened by a substantial tree belt to the west and south and falls between existing housing to the north and south. Development would require the removal of substantial numbers of self-sown trees and road frontage vegetation but this would not erode the screening to the countryside. Small scale development could be accommodated without harm to the wider countryside.				
Biodiversity Site is densely wooded with unmanaged trees. It is likely that there could be some wildlife interest on the site although this would not necessarily be diminished by sensitive development. There is a pond indicated at Wells Farm, under 250m from the site, and a Habitat Suitability Index survey for great Crested newts should be carried out.				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be required.	
Green Infrastructure The site is too small to have any significance in GI.				
Proximity to Road Network SHLAA Score: -- Access to the site could be achieved for up to five dwellings but would involve the removal of a substantial amount of frontage vegetation. The lack of footways in this part of Gore Lane makes it a less than ideal site to develop.				
Access to Services SHLAA Score: --				

There is a bus stop adjacent to the site (route 14, hourly to Deal and Sandwich) and the site is 400m from Eastry C of E Primary School. The centre of Eastry, with a range of shops and a GP surgery is approximately 500m walk away. There is, however, no footway along Gore Lane from the site.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

Although development would involve the removal of trees and vegetation, which could change the appearance of Gore Lane, and there is no footway at this point, small scale development of up to an additional 3 dwellings could be achieved without a harmful impact on the countryside. Nature conservation concerns could be addressed through the design process. The site is also within walking distance of public transport and the local primary school (although, for a short stretch, there are no footpaths).

As a rule, the District Council only allocates sites that would yield five or more units. As there are already two dwellings on this site it is considered that the village confines should be amended to include this area as there would only be up to three new dwellings in this area.

Consideration for inclusion in the Submission Document?

Yes

Site Code SHL053	Address Lower Gore Field, Gore Lane	Parish Eastry	Overall SHLAA Score 31 (11-15 Years)	Area 1.19ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>This site is located to the north west of Eastry and is part of a much larger open field, which is currently cropped. The site is generally flat with only a slight undulation.</p> <p>There is no natural boundary to the west. There is a hedgerow running along the northern boundary and Lower Gore Lane (a country lane) runs along the eastern boundary. To the south there is a small area of trees surrounding a property (EAS05). There are residential properties to the east but these front Orchard Road (the rear gardens back onto Gore Lane).</p> <p>Pylons run down the length of the western boundary.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is located outside, but adjacent to, the Settlement Confines. Only the width of the road separates the eastern boundary from the line of the confine.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site is within Flood Zone 1, which is appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site.</p> <p>Any development of the site could prove difficult to connect both the existing built form and to the village centre. Existing development to the east backs onto the road and, in urban design terms, it would be difficult for any new built form to respond positively to this.</p> <p>Landscape Impact</p> <p>The impact of development on landscape character would be unacceptable. The site is located on the edge of the settlement and comprises open farmland with no natural boundaries. This affords views of the open countryside. If developed, a hard urban edge would be introduced and the views and the rural character of the area would be lost.</p> <p>Biodiversity</p> <p>It is unlikely that development would impact on protected species, given that the field is currently arable.</p>				
EIA Screening: needed due to size.			Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be needed.	
<p>Green Infrastructure</p> <p>There is urban access via Orchard Road and Peak Drive towards the centre of Eastry, but no direct footpath links to the countryside. Development would not provide such a link.</p>				

<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site An acceptable vehicle access can be created, although a footway would be required to link to the village centre. There is a bus stop located to the south of the site.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk There is a bus stop adjacent to the site (route 14, hourly to Sandwich and Deal). The SHLAA score reflects the fact that the Primary School is located within a five minute walk from the site, whilst the GP Surgery is a slightly longer walk, approximately ten minutes (although there is no continuous footway from the site)</p>	
<p>Market Attractiveness SHLAA Score: 6.0 - Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis Although an access is achievable, is close to public transport connections and is in the sequentially preferable Flood Zone 1, any new development would not ‘connect’ with the existing urban form, would change the rural character of this area and would have a detrimental impact on the wider landscape. Therefore, development of this site should be strongly resisted.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Goodnestone

Site Code SAD32	Address Land at Yew Tree Farm, Boyes Lane	Parish Goodnestone	Overall SHLAA Score 26 (Undeliverable)	Area 0.22 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site <p>Square shaped site located in the northern part of Goodnestone. The site is located on the site of a dry valley which falls gently to the east. The site consists of two farm buildings, one large shed located in the north eastern corner and one smaller unit located in the south eastern corner of the site. There is a large area of hard standing located between the two farm buildings. The remaining land (the north western part of the site) appears to be scrub. The site boundary consists of hedging or scrub.</p> <p>Boyes Lane, which is a single width rural lane, runs along the western boundary. On the opposite side of the lane there is a new housing development. To the north, west and south there are agricultural fields. To the south west there is the residential dwelling of Yew Tree Farm.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site lies outside of the Settlement Confine. The Confines are located along the opposite side of Boyes Lane on the western boundary.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed Flood Risk The site lies within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment The site lies within the Goodnestone Conservation Area and the neighbouring building, Yew Tree Farm, is a Grade 2 Listed Building. Development of the site would have a detrimental impact on the rural nature of the Conservation Area and listed farm house, through the loss of the open space which makes a valuable contribution to the character of the area on the edge of the village. Existing development on Boyes Lane has recently been completed but this is set back from the Listed Building and there is some screening from existing vegetation. The combination of the existing, any new development and the inevitable loss of vegetation, would consolidate the urban form on the edge of the village to the detriment of the sensitive historic assets.				
Landscape Impact The site is located on the edge of the village and provides a soft transition between the countryside and the settlement. The nearby new development on Boyes Lane has hardened the urban edge and it is seen that development here would exacerbate that impact, both altering the local character and the visual impact on the countryside.				
Biodiversity There maybe a bat interest associated with the barn.				
EIA Screening: Too small			Appropriate Assessment: Too small	
Green Infrastructure The size is too small to have any significance on the GI network.				

<p>Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility</p> <p>The access is very poor in terms of visibility and will need to be improved or relocated. As the existing use of the site is a farm it is unlikely to generate higher traffic movements than the potential existing land use by 5 or 6 houses. Some level of pedestrian safeguarding will be required on the access road and this will need to be incorporated into the layout. Alternatively, direct access for each individual dwelling could be achieved with direct frontages. The site is not, however, sustainable in travel terms and reliance on the private car is likely to be high due to the lack of local shops and limited bus service.</p>	
<p>Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is located approximately 80m away from a bus stop (routes 542 (Sandwich and Deal) & 544 (Walmer and Canterbury). This service is, however, infrequent. The site is also approximately 200m from the village hall (which is proposed to be the new location of the Post Office) and Goodnestone C of E Primary School. In addition, the public house and playing field are all within a five minute walk.</p>	
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is located close to a bus stop (although an infrequent service), the school and is outside the Flood Zones 2 and 3, the site is on the edge of the village in a highly visible location and development would be highly detrimental to the setting of the village, the Listed Building and on the Conservation Area, through the consolidation of the urban form on the edge of the village.</p>	
<p>Recommend for inclusion in the Submission Document?</p>	<p>No</p>

Great Mongeham

Site Code MON01C	Address Land to the west of Lansdale, Northbourne Road,	Parish Great Mongeham	Overall SHLAA Score 30 (11-15 years)	Area 1.34 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Flat, rectangular shaped area of land located on the top of a ridge on the western edge of Great Mongeham. The site has been put forward as a change to the settlement confines.</p> <p>The majority of the site consists of agricultural land but the area also includes two residential properties (Holmleigh and Sparrow Court) at the northern end of the site. These are well contained within hedgerows and trees. There are no features along the north eastern boundary that delineate the line indicated on the plan submitted.</p> <p>Northbourne Road runs along the south western boundary. This is a single width rural lane which is derestricted. There is a hedgerow running the length of the boundary with telegraph poles located within it. There are residential properties at the southern end of the site. The majority of the surrounding area consists of open agricultural fields.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The area is outside the Settlement Confines but the southern boundaries abut it. If the area was considered suitable for inclusion, amendment of the line would be possible.				
Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed				
Flood Risk The site falls within Flood Zone 1, residential development would be appropriate in this location.				
<p>Historic Environment</p> <p>Although there are no Listed Buildings or Conservation Areas within the site, the Church Great Mongeham Conservation Area (with six Listed Buildings within) is approximately 130m away from the eastern corner of the site. If the site was developed, there would be minimal impact on the setting of this Conservation Area.</p> <p>The site area consists of a large open space between the two residential properties to the north of the site and properties in the south. This space, therefore, contributes to the open character of the village edge. Any change in Settlement Confine could lead to further development and this would change the rural character of the area.</p>				
<p>Landscape Impact</p> <p>Northbourne Road lies on a ridge. Infilling would have an adverse impact on the landscape as it would lead to the creation of a ribbon development, extending the built form further along the ridge when viewed from the A258 at Sholden.</p>				
There are however, existing dwellings located along Northbourne Road, overlooking part of the farm land, which would act as the 'back drop' to new development. The impact on the wider landscape would be reduced.				
Biodiversity				

<p>There is unlikely to be biodiversity interest, although the indicated presence of a pond in the grounds of Sparrow Court will require that a Habitat Suitability Index survey should be carried out.</p>	
<p>EIA Screening: required due to size</p>	<p>Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy will be required. There will also be a requirement to assess potential direct impact on the nearby Ramsar site.</p>
<p>Green Infrastructure The site does not contribute to GI and development is unlikely to provide any significant benefit.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Northbourne Road is narrow and there are width and visibility issues at the junction with Willow Road. If development was to take place, turning areas would have to be provided within each property and a footpath would have to be provided to the Willow Road junction. Third party land may be required for such a footway.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk The site is approximately 140m walk from the nearest bus stop (the No.14 service to Deal, Sandwich and Canterbury). Great Mongeham also has a public house, a car garage and village hall, which are just over 1km away. Hornbeam Primary School is located approximately 1.5km away from the site.</p>	
<p>Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 3.5 – 2-3 Ownerships</p>	
<p>Analysis The inclusion of this land within the village confines would enable development. The area is located on the edge of the village and, apart from existing development to the south (excluded from the site), is undeveloped apart from two houses at the northwest extent. Development of the agricultural land up to these two houses would have a detrimental impact on the rural character of the area, introducing a hard edge to the village, and, as the land is located on a ridge, it would also have a detrimental impact on the wider landscape. Northbourne Road is narrow and there are width and visibility issues at the junction with Willow Road. If the confines were redrafted to include land up to the line of the existing dwellings along the western side of the road the landscape impact would be reduced. Development would, however, require a footpath and turning areas within each property to overcome some of the Highway concerns.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Part of the area Landscaping Footpath</p>	<p>Yes</p>

Site Code MON02C (including LDF050)	Address Stretch of Cherry Lane from the junction with Northbourne Road to junction with Pixwell Lane.	Parish Great Mongeham	Overall SHLAA Score Change of confines to include existing development.	Area 1.13 Ha
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>An amendment to the settlement confine, to extend it to cover an irregular shaped area located on the south eastern edge of Great Mongeham. The area of land covers six properties and farm buildings. There are two plots of vacant land, one plot used for grazing land and the other is scrub. The scrub land appears to be raised in relation to the road. The boundary line follows the property ownership to the south but cuts across those in the north. If the settlement was to be changed, it would be unlikely that there would 33 units as suggested above as the site is within multiple ownership and developable land is restricted.</p> <p>The Preferred Options (2008) Site Allocations Document identified the slightly smaller area LDF050.</p>				
Policy Alignment SHLAA Score: --				
<p>The area is outside the settlement but is adjacent to the confines. If the area was considered suitable for inclusion, amendment of the line would be possible.</p>				
Physical Constraints SHLAA Score: --				
<p>Flood Risk</p> <p>The site is within Flood Zone 1, residential development would be appropriate within this zone.</p> <p>Historic Environment</p> <p>There are no Conservation Areas covering the site but the site is adjacent to the Church Area Great Mongeham Conservation Area (and Listed Buildings along Northbourne Road) which lies to the north. Great Mongeham Farm, in the south of the site, is a Grade 2 Listed Building.</p> <p>The character of the area consists of individual buildings separated by open areas. These spaces are just as important to the character of the area as the buildings themselves. This character is especially important to the setting of Great Mongeham Farm.</p> <p>If the whole area was to be included within the village confines, there is a strong possibility that sites could be redeveloped, increasing the density of the urban grain in the area, and this would have a detrimental impact on the setting of the Conservation Area and Listed Buildings.</p> <p>The northern part of the area, closest to the Conservation Area, and the parcel of land north of the Listed Building, should be excluded to ensure that the setting of these historic assets are retained.</p> <p>It is considered that there is an opportunity for limited development, utilising the footprint of the disused farm buildings at Great Mongeham Farm (to the south of the Listed Building). These are, however, probably too dilapidated to be converted under adopted Core Strategy Policy DM4 (reuse of rural buildings). It would, therefore be advantageous to include this area within the settlement boundary and rely upon the planning application process to provide a suitable scheme.</p>				
<p>Landscape Impact</p> <p>The properties on the NE of Cherry Lane reflect a usual tapering of properties at a village edge, with the junction at Northbourne Lane having a minor effect in increasing density. This is not reiterated on the SW of the road, in that Great Mongeham Farm, which is essentially of rural character, bounded by fields, with</p>				

the rural lane, Pixwell Lane, forms the dominant visual form. Although change of confines would not automatically confer landscape change, it would encourage infilling with consequent adverse impact on the rural landscape. The return to higher density properties at the Northbourne Road/Cherry Lane junction would moderate this adverse impact on the countryside.

Biodiversity

The land comprises horse pasture, scrub woodland, farmstead and domestic properties. Bats are known in the area and this mix of natural and built structures would indicate a good habitat. While change of confines may not affect bat population, development may potential be restricted. Additionally, farmland birds (including owls) and common reptiles may be present in significant numbers.

EIA Screening: needed due to size, if dph generates over 15 potential dwellings

Appropriate Assessment: as for EIA screening, there may be a need for as contribution to the Thanet Coast SPA mitigation strategy.

Green Infrastructure

Pixwell Lane is a Byway open to all traffic (ED53) connecting to Beacon Hill and constitutes a significant link in the recreational walking route linking Deal to Whitfield. Footpath ED54 comes into the site from the SW. Change of confines could increase the traffic on Pixwell Lane, be detrimental to biodiversity and have an adverse landscape impact. Overall change of confines could have an adverse impact on GI. However, there would be no objection should the SW of Cherry Lane be omitted south of Parknasilla as this would retain the essentially rural character of the farmed landscape and have minimal impact on biodiversity.

Proximity to Road Network SHLAA Score: --

If development were to be proposed, vehicular access may be achievable to support small scale development. There are, however, no footways to the site.

Access to Services SHLAA Score: --

The northern most point of the area is approximately 60m from the nearest bus stop. Great Mongeham also has a public house, a car garage and village hall. These are just under 1km away. Hornbeam Primary School is located approximately 1.3km away from the site.

Market Attractiveness SHLAA Score: --

Ownership SHLAA Score: --

Analysis

The site has been suggested for a change of confines. If the confines were changed to include the whole area this could have a detrimental impact on the setting of the Listed Buildings, Conservation Area and the GI network through the possibility of increasing the density of the urban grain through redevelopment and/or infill development in the area.

There is, however, potential to extend the village confines in this location to include the redundant farm buildings of Great Mongeham Farm to enable limited development.

Consideration for inclusion in the Submission Document?

Yes

Amend line of confine to include Great Mongeham Farm but exclude land to the north.

Site Code NS01MON	Address Great Mongeham Farm, Pixwell Lane	Parish Great Mongeham	Overall SHLAA Score 37	Area 0.36 Ha
		Hierarchy Village	0-5 years	Indicative No. of units @ 30 dph = 11
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>Irregular shaped site located on the southern boundary in Great Mongeham. The site currently consists one large farm building and associated hard standing. There are trees (mature to the west and north of the site) and scrub filling the remaining parts of the site. The land rises gently to the west.</p> <p>There are disused farm buildings to the north east and agricultural land to the northwest, west south and south east.</p>				
Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation				
The site is completely outside the settlement confines. If the recommendations for MON02C are accepted, this site would be adjacent to the new confines.				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints				
<p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>Great Mongeham Farm House, to the north east of the site, is a Grade 2 Listed Building. Development of this site for housing would have a detrimental impact on the setting of the Listed Building by introducing denser urban form where there should be softer, open spaces usually associated with edge of village locations. The spaces between buildings are just as important to the character of the area as the buildings themselves.</p>				
<p>Landscape Impact</p> <p>The landscape setting of the site is of part of a farmyard sitting in a farmed landscape, passed by a narrow lane (Pixwell Lane) which, itself, tapers out into a byway open to all traffic, linking to Beacon Hill. Development at 30 dph would be incongruous in such a location, where it might be expected that there could be a few cottages associated with the farm landscape.</p>				
<p>Biodiversity</p> <p>There may be bats associated with the farm buildings and survey would be required. Common reptiles may be present and a scoping survey for use by owls would be necessary.</p>				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be needed.	
<p>Green Infrastructure</p> <p>Pixwell Lane is an important connection for recreational walking across the southern part of the district. It is important to maintain it tranquillity. Apart from this, there are no GI concerns.</p>				
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site</p> <p>Whilst the scoring in the SHLAA indicates that the site is less than 5 metres away from the road, Pixwell Lane, this is narrow and suffers substandard visibility at its junction with Cherry Lane. Development of more than 5 units would not, therefore, be supported on the site (subject to the</p>				

existing use of the site being abandoned). Cherry Lane is unsuitable for large vehicles and there are no footways in the vicinity.

Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk

The site is approximately 300m away from the nearest bus stop (the No.14 hourly service to Deal, Sandwich and Canterbury). There are, however, no footways in the vicinity. Great Mongeham also has a public house, a car garage and village hall, which are just under 1km away. Hornbeam Primary School is located approximately 1.3km away from the site.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 - Single Private Ownership

Analysis

Although the site is located in the sequentially preferable Flood Zone 1 and is within walking distance of a bus stop, development of this site is considered to be unsuitable due to poor access and having a detrimental impact on the setting of a Listed Building and on the wider landscape. The site is also poorly served by footpaths.

Recommend for inclusion in the Submission Document?

No

Site Code MON03C	Address Land to the South of Cherry Lane.	Parish Great Mongeham	Overall SHLAA Score 23.5 (underliverable)	Area 1.35 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Flat irregular shaped area, located south of a rural lane, which has been requested to be included in the village confines. The area consists of four residential dwellings, one located to the west of the site and three to the east. These dwellings are separated by agricultural farm land and this forms the majority of the site area. The area identified is approximately one metre higher than the lane, which has resulted in a steep bank along the northern boundary. There are mature trees along this bank.</p> <p>To the north of the site there are residential properties and these are within the current settlement confines. The southern boundary initially follows the line of the rear garden in the west but then cuts across the field to the western properties. The line across the field does not follow any physical features. There are agricultural fields to the south and to the west of the site. To the east there is a farm (please see SHL007).</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The area is adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site is within Flood Zone 1, residential development would be appropriate within this area.</p> <p>Historic Environment</p> <p>Whilst there are no Listed Buildings or Conservation Areas within the site, the eastern part of the site abuts the Mongeham Road Conservation Area. The eastern corner is also adjacent to five Listed Buildings. The change in the confine at this location is unlikely to change the character of the area as there are already three dwellings here. The setting of the Listed Buildings and Conservation Area is, therefore, unlikely to change. If these dwellings were to be redeveloped the setting of the Listed Buildings and the Conservation Area would be considered by Development Management policies.</p> <p>With regard to the undeveloped land to the south of Cherry Lane, if this part of the site was included within the confines there would be a presumption to allow development. There is a distinct difference between the built form (the line of residential dwellings) in the north and the area to the south. If the settlement confines were to be amended to include the undeveloped land and development took place, the whole character of the area would change as the trees and the bank would need to be removed to obtain the necessary sight lines and access to the site. This would be to the detriment of the area.</p> <p>Landscape Impact</p> <p>The suggested area consists of part of a larger arable field without any natural boundary to the south. If the confines were to be extended to include this land it would require extensive earthworks onto Cherry Lane for any development to take place and this would have a detrimental impact on the semi-rural character of the Lane. It is unlikely that the indicated housing number could be achieved, due to the earthworks required and attempting to build to 30 doh would, itself, have a harmful impact on the character of the area.</p>				

Biodiversity	
Bats may be associated with the properties and/or hedge lines. There will be other, minor, biodiversity interest associated with the gardens.	
EIA Screening: needed for the dph indicated	Appropriate Assessment: at the dph indicated. A contribution to the Thanet Coast mitigation strategy would be necessary.
Green Infrastructure	
There are no PRow paths, so residents would have to use Cherry Lane. Development would lead to urbanisation of the lane and discourage walking. Considering landscape impact and biodiversity, it is considered that change of confines and associated development would be detrimental to GI.	
Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility	
Cherry Lane is narrow with high banks and trees along the southern edge. If any development were to be proposed, the Lane would have to be widened and the bank regraded to provide access points. A footway would also need to be provided.	
Access to Services SHLAA Score: 2.0 – Site with at least 1 of 3 from: public transport, GP surgery and school within 10 minutes walk	
The north eastern corner of the site is approximately 360m away from the nearest bus stop (which serves the No.14 service, hourly to Deal, Sandwich and Canterbury) and 440m from the local store. Great Mongeham also has a public house, a car garage and village hall, which are approximately 500m away. Hornbeam Primary School is located just over 1km away from the site.	
Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost	
Ownership SHLAA Score: 2.5 – Multiple 1-5 hectare	
Analysis	
The inclusion of this land within the settlement confines would enable development. Cherry Lane is narrow with high banks and trees along the southern edge. To accommodate development this road would have to be widened and the bank regraded to provide access points. A footway may also need to be provided. The whole character of the area would, therefore, change as the trees and the bank would need to be removed to obtain the necessary sight lines and access to the site. Furthermore, development would also have a detrimental impact on the GI provision in the area.	
Consideration for inclusion in the Submission Document?	No

Site Code SHL007	Address Site at Hillside Farm	Parish Great Mongeham	Overall SHLAA Score 28 (+15 Years)	Area 0.67Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Irregular shaped site located on the south eastern edge of Great Mongeham, at the bottom of a valley. The site consists of a farm house and farm buildings in different sizes and states of repair. The site has a wall along the western boundary with Mongeham Road, which also forms part of a farm building (which is a Listed Building). There are residential properties on the opposite side of the road. To the north of the site has a boundary with Ellen's Hill, beyond which there is open farm land. There is farmland to the east and south of the site.</p> <p>Due to the past use as a farm the site could be contaminated. This would need to be assessed before any development could commence.</p> <p>The site has recently been granted planning permission (DOV/11/0475) for the erection of a grain store building (existing buildings to be demolished) and new access.</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The settlement confine runs along the west side of Mongeham Road. The site is therefore adjacent to the confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, this would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The Farm house and the farm building (adjacent to the main access) are Listed Buildings. There are three further Listed Buildings adjacent to the site, one to the north west and two to the west. The site is also within the Mongeham Road Conservation Area. Development of the site (which would involve demolition of part of the wall – please see highway comments below) would have a detrimental impact on the setting of the five Listed Buildings and the Conservation Area through the loss of the open nature and farm yard setting of the site.</p> <p>Development along Mongeham Road is linier. Development of the site would also be against the grain of the settlement, which would be detrimental to the character of the area.</p>				
<p>Landscape Impact</p> <p>The site is located within the valley topography and is partly screened by trees. The character of the site is of a rather dilapidated farmstead with a range of buildings of varied age and condition. Although the condition of the farmstead is poor and, except for the house itself, has an adverse visual impact. This could be improved but would not justify redevelopment of the site which would introduce an urban form into the countryside. This would be detrimental to the setting of the settlement and the landscape character.</p>				
<p>Biodiversity</p> <p>The habitat provided in the farm yard and surrounding land would be suitable for bats. If the site was considered suitable for development, any planning application would be required to undertake a bat</p>				

survey and a biodiversity scoping report.	
EIA Screening: required due to size	Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy would be required.
<p>Green Infrastructure</p> <p>The site is divorced from any GI. Although a range of PRow are nearby, the site could not contribute to these.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>An acceptable access could be achieved onto the site but this would require the removal of part of the Listed wall to enable sight lines. The wider road network should also be capable of accommodating the additional traffic envisaged from a development of this size.</p> <p>There is, however, no continuous footway along this section of the road.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The SHLAA score reflect the fact that the site is five minutes walk away from the nearest bus stop (bus Route 14, hourly to Canterbury, Sandwich and Deal). Great Mongeham also has a public house, a car garage and village hall, which are approximately 450m away. Hornbeam Primary School is located just over 1km away from the site.</p>	
Market Attractiveness SHLAA Score: 3.0 – Lower Value, Normal Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
<p>Analysis</p> <p>Whilst the site is within the sequentially preferable Flood Zone 1 and it is within walking distance of local facilities (although the footway is not continuous), the site is not considered suitable for residential development. There are doubts about the possibility of creating a suitable access and if this was achievable, this would require the removal of part of a Listed wall. The impact of this together with the development itself on the setting of the Conservation Area and Listed Buildings would be unacceptable. Furthermore, development would have a detrimental impact on the wider landscape.</p>	
Recommend for inclusion in the Submission Document?	No

Site Code SAD03	Address Site to the rear of 220 Mongeham Road,	Parish Great Mongeham	Overall SHLAA Score Not scored site too small	Area 0.1
		Hierarchy Village		
Current Use SHLAA Score: --				
Description of Site Square shaped site located to the rear of properties on Mongeham Road. The site consists of managed grass with mature trees. There is a hedgerow around the boundary. The site is surrounded by residential properties but these are low density with large gardens so the site only has one property close to its boundary (Sunnybank to the south). Access would appear to be off a private track.				
Policy Alignment SHLAA Score: --				
The site is adjacent to the settlement confines. Part of the northern boundary and the whole of the eastern boundary abut the confine.				
Physical Constraints SHLAA Score: --				
Flood Risk				
The site is within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment				
The site is adjacent to the Mongeham Road Conservation Area. There are two Listed Buildings, Champlains Well and Ivy House, located to the south east of the site. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space that makes a valuable contribution to the special character of Great Mongeham. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.				
Landscape Impact				
The local landscape is characterised by discrete housing in extensive gardens, accessed by private tracks. Development at the given density would have a detrimental impact on this character but there may be potential for a single property. In respect of visual impact, the land rises to the west so development on the site would have only a minor impact on the landscape.				
Biodiversity				
The habitat would be suitable for common reptiles, such as slow worms. If development was considered suitable a survey would be required as part of any planning application.				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be needed	
Green Infrastructure				
The site is too small and isolated to need to consider GI.				
Proximity to Road Network SHLAA Score: --				
Access would be off a private track which already serves four properties, therefore there would be no objection. There are doubts, however, whether this site has a right of access on this track. There are, however, concerns relating to visibility at the junction with Mongeham Road.				
Access to Services SHLAA Score: --				
The site is within five minutes walk of the nearest bus stop (No.14, hourly to Sandwich Deal and Canterbury). Great Mongeham also has a public house, a car garage and village hall, which are approximately 400m away. Hornbeam Primary School is located approximately 980m away from the site.				

Market Attractiveness SHLAA Score: --	
Ownership SHLAA Score: --	
Analysis	
<p>Whilst there are no highway objections to the development of this site, development in this location would result in 'backland' development that would be against the grain of the settlement. This would have a detrimental impact on the character of the Conservation Area and the setting of Listed Buildings in the area.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code MON01	Address Land behind 210 Mongeham Road,	Parish Great Mongeham	Overall SHLAA Score Small site	Area 0.03 Ha
		Hierarchy Village		
Current Use SHLAA Score: --				
Description of Site Small rectangular site located on the edge of the eastern part of Great Mongeham. The site currently consists of a garage with a small area of grass either side. The site lies behind the gardens of properties on Mongeham Road. The private track appears to serve three other properties.				
Policy Alignment SHLAA Score: --				
The site is adjacent to the settlement confines. The eastern boundary abuts the confines.				
Physical Constraints SHLAA Score: --				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment The site lies outside the settlement confines and is adjacent to (but access is within) the Mongeham Road Conservation Area. Whilst development is unlikely to affect the setting of the Conservation Area, it would fail to respect the grain of the area, where properties generally front Mongeham Road with open land beyond.				
Landscape Impact The local landscape is characterised by discrete housing in extensive gardens, accessed by private tracks. The site is small and development would be counter to this local character. In respect of visual impact, the site is discrete and the land rises to the west so development on the site would have only a minor impact on the landscape.				
Biodiversity No specific issues.				
EIA Screening: too small to be required			Appropriate Assessment: too small to be required	
Green Infrastructure Too small and isolated to need consideration.				
Proximity to Road Network SHLAA Score: --				
Access is via a single way track with poor visibility onto Mongeham Road. Development for one dwelling would only be acceptable provided on site turning facilities were made available. Due to the size of the site, this may not be possible.				
Access to Services SHLAA Score: --				
The site is approximately 280m from the nearest bus stop. Great Mongeham also has a public house, a car garage and village hall, which are approximately 400m away. Hornbeam Primary School is located approximately 980m away from the site.				
Market Attractiveness SHLAA Score: --				
Ownership SHLAA Score: --				
Analysis				

The LDF also only allocates large sites, those that have five or more dwelling units. This site is expected to achieve only one unit and would not, therefore, be considered for allocation within this process. The concerns relating to the impact on the grain of the area and access would also suggest that a change in the settlement confine would be unsuitable.

Consideration for inclusion in the Submission Document?

No

Site Code MON04C	Address Mongeham Farm Mongeham Road.	Parish Great Mongeham	Overall SHLAA Score 34.5 (6-10 Years)	Area 0.22 Ha
		Hierarchy Village		
Current Use SHLAA Score: 7.0 - Vacant brownfield land or buildings identified as derelict				
<p>Description of Site</p> <p>Rectangular site requested to be included within the settlement confines. The site appears to be within one ownership and consists of two dilapidated farm buildings and self sown scrub that has now almost completely covered the site. The larger of the two farm buildings is located on the western boundary, its rear wall forming part of the boundary line with Mongeham Road. The smaller building is located in the south eastern corner. The current access is from the south western corner of the site.</p> <p>There are residential properties to the north, north west and southwest. To the south, east and west there are agricultural fields. There is also a camp site to the west, directly opposite the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The area is outside the settlement but is adjacent to them. If the area was considered suitable for inclusion, amendment of the line would be possible.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site falls within Flood Zone 1, residential development would be appropriate in this location.</p> <p>Historic Environment</p> <p>The site is currently outside the village confines. The buildings on the site are in a poor state of repair and are located close to a Listed Building and within the Conservation Area. Development of the site could improve the setting of the adjoining listed building and Conservation Area.</p> <p>Landscape Impact</p> <p>The character of the immediate area is dominated by the remains of a massive brick farm building sited on the roadside, with a lesser, more modern derelict barn further into the site and becoming overgrown. Between these is shrubby vegetation and young tree growth. Development of the site would either need to seek to retain the character of the area by retention of the road façade, or bring about a complete change by demolition of this. Whichever route was taken, development would need to be sensitively undertaken to ensure that the change of character was beneficial. Currently the site presents an adverse visual impact and redevelopment should improve on visual impact. Overall, a density of 30dph may be too high in landscape terms, but this is ultimately dependent on the quality of design.</p> <p>Biodiversity</p> <p>The existing buildings appear to have lost most, if not all, their roofs and it would be unlikely that bats would roost. However, the more modern barn should be assessed in respect of barn owls. Elsewhere on the site there would only be limited and transitional opportunities for wildlife, except at the margins with the adjacent arable field.</p>				
EIA Screening: too small to be required			Appropriate Assessment: too small to be required.	
<p>Green Infrastructure</p> <p>The site is small and isolated from any existing GI and its contribution to GI, in general, will be insignificant.</p>				

Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility

If development were to be proposed, the necessary site lines would need further investigation due to the curvature of the Mongeham Road

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

The site is approximately 100m from the nearest bus stop (for route 14, hourly to Deal, Sandwich and Canterbury). Hornbeam Primary School is located approximately 750m to the north east of the site. Great Mongeham also has a public house, a car garage and village hall approximately 260m away.

Market Attractiveness SHLAA Score: 8.0 – Higher Value, Normal Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is located close to local facilities and public transport and sensitive redevelopment or conversion of the existing buildings could improve the setting of the neighbouring Listed Building, Conservation Area and setting of the village. Development would, however, need to be sensitively undertaken to ensure that the change of character was beneficial and there are concerns with the access.

Including the site within the confines would enable development and the issue of access could be investigated through a planning application.

Consideration for inclusion in the Submission Document?

Yes

Nonington

Site Code NON01/ NON01V	Address Land off Vicarage Lane	Parish Nonington	Overall SHLAA Score 33 (6-10 Years)	Area 0.84 Ha / 0.18 Ha
		Hierarchy Village		
Current Use SHLAA Score: 4.0 Partially occupied single use site				
<p>Description of Site</p> <p>NON01 - Rectangular shaped site located on the western part of Nonington. The site is raised above the adjoining single width rural lane (Vicarage Lane). The site consists of three residential dwellings, The Haven to the south and Rosemerrin and Threeways to the north of the site. The remaining land in the site consisting of their gardens and driveways. The site is surrounded by a hedgerow and trees. There are a number of trees scattered throughout the site. To the north and west of the site there are residential properties. To the east and south there are open agricultural fields.</p> <p>NON01V – A smaller rectangular site located within NON01 only consisting of the garden land associated with The Haven. This was suggested for one or two dwellings.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is outside of the Settlement Confines. The western and northern boundary does, however, abut them. With regard to NON01V, only the western boundary abuts the confine.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p>				
<p>Flood Risk</p> <p>The site is located within flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The northern part of the site is within the Church Street Nonington Conservation Area and two properties within the site area are Listed Buildings (Rosemerrin and Threeways). The site is also important in terms of the setting of Church Cottage, which is also listed. Any new access to site would require significant changes to the Lane which would detract from the character of the setting of the Conservation Area and Listed Buildings.</p>				
<p>NON01V is located outside of the Conservation Area but is located 30m away from it. Development here would still have a detrimental impact on the setting of the Conservation Area due to the loss of open space and the visual impact.</p>				
<p>Landscape Impact</p> <p>This location in Nonington marks the separation of the Church Street area and the housing more associated with Holt Street through a few properties of spacious grounds. The site is located on the edge of the village in a highly visible location. Development would lead to a coalescence of these two elements of the village, leading to a loss in the individual character of Church Street. Development would also have a detrimental visual impact on the wider landscape. Even restricting development to one or two properties in NON01V would alter balance in density of housing towards coalescence.</p>				
<p>Biodiversity</p> <p>The tree and hedge boundaries to the site are part of a network of wildlife corridors and could be important for several groups. There may be potential in grassland within the site for common reptiles. It is likely to be an important area for bats. To enable sight line for the access, the hedge and the bank would have to be removed. This would involve the loss of mature vegetation. There would appear to be important trees on the site.</p>				
EIA Screening: full development would need screening, based on size			Appropriate Assessment: full development would need to contribute to the Thanet Coast SPA Mitigation Strategy.	

Green Infrastructure	
The site comprises spacious private gardens. PRow footpath EE313 bisects the northern parcel of land and connects Church Street with Easole Street. The general ambience of this footpath should be maintained in order to be able to encourage recreational walking. This would suggest that NON01 could not go forward.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
Vehicular access to the site is currently poor as it is via a narrow single lane track which has a high bank. This bank would restrict sight lines. Sight lines are, therefore, considered to be too poor to accommodate any increase in vehicular activity from this access in its current form (whether NON01 or NON01V). Any improvement would involve significant alterations to the surrounding hedgerows and banks and would probably involve third party land. Further dwellings would also be likely to generate an increase in pedestrian movement along Vicarage Lane, which is without footways and has no pedestrian safeguarding, the narrowness of the Lane would be hazardous to pedestrians mixing with vehicular traffic. Kent Highways would not support any further development on this site.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP Surgery and school within 5 minutes walk	
The site is located within five minutes walk from Nonington Primary School and the bus stops near to the St Mary's Church to the north of the site. These serve the No.89 hourly service to Dover and Canterbury.	
Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost	
Ownership SHLAA Score: 3.5 – 2-3 Ownerships	
Analysis	
The site has poor access as Vicarage Lane is single track road with a high bank running the length of the site. Access and sight lines could be improved but this would require the bank and related vegetation to be removed. The removal of the bank and vegetation would, however, have a detrimental impact on the landscape, Conservation Area and the setting of the Listed Buildings.	
Consideration for inclusion in the Submission Document?	No

Site Code NS01NON	Address Land at Lynton, Mill Lane	Parish Nonington	Overall SHLAA Score 27	Area 0.23Ha
		Hierarchy Village	Undeliverable	Indicative No. of units @ 30 dph = 7
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>Rectangular shaped site located on the southern edge of the settlement. The site consists of a garage/shed and hard standing on a small proportion of the site (to the east) with the remaining larger part consisting of a private garden (of Lynton, which has been excluded from the site area).</p> <p>The eastern boundary is defined by a wooden fence that fronts Mill Lane. The southern boundary consists of a hedge and a short section of a wall with a gate. There is a line of mature trees along the western boundary and a hedge along the northern.</p> <p>The neighbouring uses consist of residential to the north and west, and open agricultural land to the east and south.</p> <p>A small area of the site fronting Mill Lane, has been the subject of two planning applications (DOV/09/953 & DOV/10/1178) for one dwelling, both of which have been refused by the Council. The first was refused at appeal on the basis that the proposed design would fail to preserve or enhance the character and appearance of the Conservation Area. The second application has been granted on appeal. The Inspector concluded that the revised design of the proposed dwelling would enhance the Conservation Area.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>Part of the southern and the western boundaries are adjacent to the settlement confine.</p>				
<p>Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints</p> <p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The frontage of the site (including the garage/shed) falls within the Easole St Conservation Area. The site contributes to the open character of the village edge and it is the loss of this openness that would have a detrimental impact on the Conservation Area. However, there are outbuildings and the recent Inspector appeal decision indicated that this could be improved by the proposed new dwelling.</p> <p>Landscape Impact</p> <p>The location of the site is at the village and is part of a defined boundary formed by two gardens. It follows that if the boundary condition is maintained and development behind it were not of inappropriate density/design, there would be no change to landscape character and the visual impact would be limited. An appeal decision for 09/0945 (a smaller area) suggested that the site appears to be ‘...physically part of the village...’, that ‘...the existing boundary fence forms a firm demarcation...’ and the ‘...impression is of a clear and abrupt transition between adjoining farmland and the appeal site.’</p> <p>Biodiversity</p> <p>There may be very limited biodiversity interest, which development would further reduce.</p>				
EIA Screening: Too small to be needed			Appropriate Assessment: too small to be needed	

Green Infrastructure	
The site lies within 100m of Fredville Park and is visible from Public Bridlweay EE317 (Butchers Lane) to the SW and footpath EE318 to the SE. However, as long as the existing boundary is kept, there would be no diminution in ambience for path users. Otherwise the site is neutral in respect of GI.	
Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site	
Mill Lane is subject to a 30mph speed limit at the proposed access point of the site. The speed limit changes to national speed limit when travelling south east along Mill Lane. There is a level difference between the site and the adjacent field which may make sight lines difficult to achieve. There are no footways in the vicinity of the proposed site and the site is a short walk to the local bus route. There would be no objection to a small scale development of up to 5 units but would stress that reliance on the private car is likely to high due to the remoteness to public amenities, contrary to government objectives.	
If the planning application was implemented then the access would have to be from Hammond Close. Although the representation suggests that this would be possible, this may require third party land.	
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk	
There is a bus stop within five minutes walk of the site. This bus service is the 89, hourly to Dover and Canterbury. The local primary school is located on the western side of the village, which is approximately 1.4km away from the site.	
Market Attractiveness SHLAA Score: 2.0 – Medium Value, High Cost	
Ownership SHLAA Score: 4.5 - Single Private Ownership	
Analysis	
Development of the site would not have a detrimental impact on the landscape or the setting of the village. The site is also located in the sequentially preferable Flood Zone 1 and is also within five minutes walk of a bus stop. KCC Highways would not object to a small scale development of up to five units but access may require third party land if the recent planning application is implemented.	
There are, however, no footways to the site and the lack of local facilities would make this development very car dependant.	
The two recent planning applications have indicated that the land in question forms physically forms part of the village. The Settlement confines should, therefore, be amended to include the site. If access could be gained, then this could provide development potential for up to an additional four dwellings.	
Recommend for inclusion in the Submission Document?	Yes

Site Code SHL015	Address Prima Windows, Easole Street, Nonington	Parish Nonington	Overall SHLAA Score 27 - (Undeliverable)	Area 1.14 Ha Indicative No. of units @ 30 dph = 34
Current Use SHLAA Score: 4.0 - Partially occupied single use site				
<p>Description of Site</p> <p>Rectangular factory site on the edge of a rural settlement, screened from the open countryside by a line of mature trees along the north eastern boundary, with residential properties to the south and east. The site consists of two large industrial buildings, located on the north western half of the site and open space at the south eastern half. The current site provides off street parking for workers for approximately 20 to 25 cars but this is not sufficient and cars overspill and park along Easole St, where the front entrance of the site is located.</p> <p>The site was scored in the SHLAA on the basis that there is a current use. The company operating here has indicated that they are looking to relocate so that they can expand their business and development of the site would enable this move. This would suggest that the site would have potential in the longer term.</p>				
<p>Policy Alignment SHLAA Score: 6.0 - Partially Outside Development Envelope with no designation The frontage to the site falls within the Village Confines, the remaining is outside of it.</p>				
<p>Physical Constraints SHLAA Score: 3.0 - Within or partially within Flood Zone 2 or with pylons & utilities or contamination issues</p> <p>The site may have the possibility of contamination, which has resulted in the score in the SHLAA. A Contamination Survey would also need to be undertaken. There are no pylons or utilities crossing the site.</p> <p>Flood Risk</p> <p>The site is within Flood Zone 1 which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The site is adjacent to a Conservation Area and four Listed Buildings (one which is located adjacent to the main entrance of the site). Development could enhance setting of Listed Buildings/Conservation Area with removal of industrial buildings. Any development would, however, have to reflect current grain and density of existing development in the village.</p> <p>Landscape Impact</p> <p>Sensitivity of this site in the wider landscape is moderate and the condition of the site is poor, due to the industrial buildings on the village edge.</p> <p>Development would not have a detrimental impact on the setting of the village or on the wider landscape if the trees are retained. Any development would, however, have to be of a suitable distance away from the trees to ensure that pressure to remove them at a later date by residents is reduced. A tree survey would have to be undertaken as part of any planning application. This would result in a reduced number of properties with substantial gardens and these would, therefore, be at a lower density than the 30dph indicated at the top of this form.</p> <p>Biodiversity</p> <p>There could be an impact on bat roosts and their navigation if there is a loss of the buildings and/or trees when the site is developed. There could be potential for other biodiversity interests so any developer/applicant would have to undertake a Biodiversity Scoping Survey.</p>				
EIA Screening: required due to size			Appropriate Assessment: a contribution to the Thanet Coast SPA mitigation strategy required.	
Green Infrastructure				

<p>There are no PRow in the vicinity which development could link to. With careful design the protection of the significant trees could be linked to SUDs swales, creating a soft edge to development.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site.</p> <p>A suitable access (which would need to be of an adoptable standard) could be created and the wider road network can accommodate the additional traffic of such a development. There are no footways adjoining the site but this would not prevent development. The lack of local facilities would make this development very car dependant.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk.</p> <p>The site is within five minutes walk from a bus stop. This bus service is the 89, hourly to Dover and Canterbury. The local primary school is over 1 km away. The village also has pubs and a community hall.</p>	
<p>Market Attractiveness SHLAA Score: 2.0 – Medium Value, High Cost</p>	
<p>Ownership SHLAA Score: 4.5 - Single Private Ownership</p>	
<p>Analysis</p> <p>The results in the SHLAA indicate that the site is undeliverable as it scored poorly in five categories; Current Use; Policy Alignment; Access to Services; Physical Constraints and Market Attractiveness. However, after further site visits and the consideration of additional information, it is now justified to re-evaluate the deliverability of this site.</p> <p>The results in the SHLAA reflect that there is a current use. Whilst this is correct the Council have been informed that the owner/occupier is seeking to move to larger premises to expand the business and the development of this site for residential would enable this.</p> <p>With regard to policy alignment, the Core Strategy (Policy CP1) has now been adopted and this designates Nonington as a 'village', a settlement suitable for some development. The site is currently partly outside of the village confines but these could be redrawn to include the site without undermining the purpose of that designation.</p> <p>Whilst there may still be an issue with contamination (physical constraints) this could be investigated with a Contamination Survey and mitigation identified.</p> <p>Development would be possible on the site, reflecting the current historic grain/density of the village and the access constraints. With the removal of the industrial unit and restricting development to lower density, the setting of the Listed Buildings and Conservation Area could also be enhanced. Before development commences, a contamination survey, tree survey and a biodiversity scoping report would need to be undertaken. As the site is occupied and demolition is required it is estimated that this site could be developed in the longer term (15+ years).</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>Yes</p>
<p>There is potential for development of this site but it would have to be shaped by the surrounding historic environment and existing tree coverage. Any development would have to address the following matters:</p> <ul style="list-style-type: none"> ▪ Relationship to adjacent Listed Buildings ▪ Tree Survey ▪ Contamination ▪ Access 	

Site Code PRE01	Address Land to the west of Grove House, Grove Way, Preston	Parish Preston	Overall SHLAA Score 29.5 (+15 Years)	Area 0.3 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular shaped site, located to the north of Preston, on high land which lies over Preston valley. The land consists of horse pastures and there are no natural boundaries to the south and west. The site lies to the east of linear residential development. Grove Road is a narrow rural road which is well used; it also accommodates HGV movements from Salvatori, a business unit located approximately 350 metres further along Grove Way to the north west. Part of the frontage to the site is located where the road bends; this bend continues to the north and therefore sight lines are poor.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site lies outside of, but is immediately adjacent to, the Village Confines (the eastern boundary abuts is).				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints Flood Risk The site is within Flood Zone 1, which would be appropriate for residential development. Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. The northern most part of The Street Preston Conservation Area lies approximately 110 metres to the east of the site. Landscape Impact The site is one of a set of horse pastures set on high land above the Preston valley. There are no natural boundaries to south and west of the site. Any development would have a detrimental impact on the landscape especially viewed from the south. Biodiversity The site is horse pasture which tends to limit floristic diversity. Common reptiles may be supported and the site has moderate habitat potential for bat foraging. Biodiversity should not be a constraint.				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be needed.	
Green Infrastructure To the east of the site, a rural footpath EE153 connects Grove Way to The Forstal and forms an important link in the local recreational walking network. Development would have a minor adverse impact on the ambience of this footpath. Housing in this location could not offer any enhancement to GI and overall, the impact is negative.				
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site An acceptable access cannot be created due to poor forward visibility and sight lines. There are also no continuous footway links to the village centre.				
Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk				

The SHLAA score reflects the fact that the school and bus stops are within a ten minute walk. Other facilities in the village include a Village Hall and shop. There is, however, no continuous footpath to these facilities.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

Although the site falls outside flood Zone 2 and 3 and that local facilities are within ten minutes walk, the site is considered to be unsuitable as any development would have a harmful impact on the wider countryside, especially when viewed from the south, and an acceptable access cannot be achieved due to poor forward visibility and sight lines.

Consideration for inclusion in the Submission Document?

No

Staple

Site Code STA01C	Address Land to the West of Orchard Lea, The Street	Parish Staple	Overall SHLAA Score Not assessed. (Change of confine)	Area 0.73ha
		Hierarchy Village		
Current Use SHLAA Score: --				
<p>Description of Site</p> <p>A flat rectangular site lying on the western side of the village, lying between a residential property, Orchard Lee (at the time of the survey this was being rebuilt), and the affordable housing scheme at Bates Close. Formally submitted as a change to the confine. The site fronts The Street on its northern boundary where there are low density residential dwellings opposite. There are open fields to the south west and an area of scrub/trees to the south east.</p> <p>The site has two distinct uses. The eastern half is used as a garden for the neighbouring property (Orchard Lee) whilst the western half is dense scrub. The site is heavily screened by trees/hedgerows on all boundaries.</p>				
Policy Alignment SHLAA Score: N/A				
<p>The site lies outside the Settlement Confines. The site is separated from the confine to the north by a width of a road (The Street). The north eastern corner does about the confine which crosses the road to include Orchard Lee.</p>				
Physical Constraints SHLAA Score: N/A				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>The site is 20m away from St James Church, which is a Grade I Listed Building. If the confine was to be changed to include this site, development at 30 dwellings per hectare would urbanise the area. Such development would also inevitably lead to the removal of the hedge, which makes a significant contribution to the open character of the rural lane and setting of the church. Development would, therefore, would have a detrimental impact on the setting of the church.</p> <p>If new development reflected the density of the surrounding urban grain and the majority of the hedgerow was retained then there may be a possibility for development. This would, however, result in the maximum of two dwellings being developed.</p>				
<p>Landscape Impact</p> <p>This part of Staple is generally distinguished by large properties in spacious grounds, although development around the public house and for affordable housing has eroded that character somewhat. The site is flat and comprises part garden and part dense scrub. The scrub is contiguous with other areas to the west and south. Inclusion in the village confines could put pressure on the other scrub areas to be included which would be detrimental to the setting of the village.</p>				
<p>Biodiversity</p> <p>There will undoubtedly be a nature conservation interest primarily for breeding birds but also in more open areas there is likely to be common reptile interest. If left, the scrub will eventually become woodland. Development would alter the biodiversity interest, but may not reduce it.</p>				
EIA Screening: necessary due to size			Appropriate Assessment: a contribution to the Thanet coast SPA Mitigation Strategy would be required.	

Green Infrastructure	
PRoW footpath EE190 runs alongside the eastern boundary, separated by a hedge from the site. It would be important for any development to respect the rural nature of this footpath and avoid any hard landscaping frontage. The site is otherwise GI neutral.	
Proximity to Road Network SHLAA Score: N/A	
No highways objections other than a pedestrian footway would need to be provided.	
Access to Services SHLAA Score: N/A	
The site is approximately 70m away from the nearest bus stops, which are located adjacent to Bates Close to the west. These serve the No.14 route, which run hourly to Canterbury, Sandwich and Deal. The public house is just further along from the bus stops.	
Market Attractiveness SHLAA Score: N/A	
Ownership SHLAA Score: N/A	
Analysis	
Whilst there are no highway objections to this site, development at 30dph would urbanise the edge of the village which would be detrimental to the rural setting of the village and the church, which is a Grade I Listed Building. There may, however, be an opportunity for low density development, reflecting the urban grain in this location.	
Consideration for inclusion in the Submission Document?	Yes
Change of confines only.	

Site Code SHL008 (SUT03)	Address Land North of Lower Road and to the east of Durlock Road.	Parish Staple	Overall SHLAA Score 29 (+15 years)	Area 0.74Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 22
Current Use SHLAA Score: 1 Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation.				
Description of Site Irregular shaped piece of land, situated on the edge of the village, consisting of scrub and trees with the appearance of an old orchard. The land rises gently to the north east. Lower Road forms part of the southern boundary. The site also has a boundary to the south with one residential property (Holly Tree) and to the north by another (Rycote). To the east there are agricultural fields. Durlock Road forms the western boundary and with residential properties running along the opposite side of the road. There is a change in levels between the site and Durlock Road, which varies from approximately 1 meter at the northern end and dropping to road level to the south.				
Policy Alignment SHLAA Score: 4 Completely Outside Development Envelope with no other designation or non housing designation The site lies outside the settlement confines. The site is separated from them by the width of the road. The confines include Holly Tree to the south and the site abuts them at this point.				
Physical Constraints SHLAA Score: 8 No obvious physical constraints				
Flood Risk The site lies within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment There are no Listed Buildings within the site but there are two adjacent to it (Staple Farmhouse and Thatch Cottage), which are located to the west of the site on Durlock Road. The southern part of the site currently acts as a screen to new development and creates a soft edge to the rural village. Development, which would include road improvements, would detract from the open rural setting of the Listed Buildings (Staple Farmhouse and Thatch Cottage).				
Landscape Impact The site is bounded to the east by a bank and hedge, partially enclosing it. Durlock Road comprises sporadic development at the village edge and infilling here would increase urbanisation and there may be a tendency for ribbon development. Development on the site would have a detrimental impact on the semi-rural landscape.				
Biodiversity The scrub woodland to the south will support some biodiversity as will the scrub along the eastern boundary. The grassland appears poor but there would be some potential here also for common reptiles.				
EIA Screening: needed due to size.			Appropriate Assessment: a contribution to the Thanet coast SPA Mitigation Strategy would be required.	
Green Infrastructure				

<p>There are no PRow near. Surface water flood risks would have to be managed, preferably by use of swales. Otherwise the site is GI neutral.</p>	
<p>Proximity to Road Network SHLAA Score: 5 Less than 5 meters from road assuming direct access to site</p> <p>A suitable access onto Durlock Road may be possible but would require the removal of the bank and the cutting back into the site to improve sight lines and the provision of a footway (there is none along Durlock Road). Access would not be acceptable off Lower Road.</p>	
<p>Access to Services SHLAA Score: 2.5 Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>There is an unmarked bus stop adjacent to the site on Durlock Road, serving bus route No.14, which runs hourly to Canterbury, Sandwich and Deal.</p>	
<p>Market Attractiveness SHLAA Score: 4 Higher Value, High Cost</p>	
<p>Ownership SHLAA Score: 4.5 Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is within the sequentially preferable Flood Zone 1 and a suitable vehicular access could be achieved, the site is located in a sensitive position, being on the edge of the village opposite Listed Buildings. Development of the site (including road improvements) would detract from the open rural setting of the Listed Buildings and have a detrimental impact on the wider landscape.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>No</p>

Site Code SHL067/092	Address Land to the south of Mill Road, (small and larger site)	Parish Staple	Overall SHLAA Score 29.00 (+15 years)	Area 2.1/4.11
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>The site lies to the south east of Staple and has been requested to be considered in two sizes. The smaller site being land to the west and north of the existing recreation ground (not included), with Mill Road forming the northern boundary and Buckland Lane forming the western boundary. The larger site includes another 2ha of land further south, which, together with the small site, forms a 'C' shape around the recreation ground.</p> <p>The site has heavy tree and shrub cover in the north western corner, around the boundary of Reed Cottage and across the site to the playing fields. The boundary around the recreation ground also has sporadic trees and shrub cover. There is also a line of mature conifers along the boundary line to the east. The southern part of the site has little tree or shrub cover.</p> <p>The land to the south, which forms the larger site, lies on a ridge line. The land north and south of this gently falls away. At the northern boundary, the site is raised approximately half a metre above Mill Road.</p> <p>The majority of the land identified is currently used for agriculture, with the exception being the residential property, Reed Cottage, in the north western corner. Equestrian uses and farmland are beyond the other boundary lines. There is another property adjacent to the site at the northwest corner of the proposed site. Another three properties lie to the east of the site.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is outside the current Settlement Confines. The confine line is approximately 80m away from the nearest point of the site (the north western corner).</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site lies within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>Reed Cottage, identified as within the site, is a Listed Building. Development at this scale on the edge of the village would be detrimental to the setting of this Listed Building and to the setting of the village.</p> <p>Landscape Impact</p> <p>The general surrounds are unusual in being a mix of horse grazing and commercial horticultural nurseries, with Leyland cypress windbreaks/boundaries in various locations and sporadic development. Overall, the landscape is in poor to moderate condition, based on these anomalous features. The site is moderately sensitive to views. Development on both the smaller and larger areas would introduce a large urban form into the countryside, which would worsen the condition of the landscape character and have a large adverse visual impact.</p> <p>Biodiversity</p>				

Biodiversity interest will be low, although a survey for farmland birds would be necessary.	
EIA Screening: necessary for both sites due to size.	Appropriate Assessment: a contribution to the Thanet coast SPA Mitigation Strategy would be required.
<p>Green Infrastructure</p> <p>The site is adjacent to recreation grounds and village hall and this relationship could be developed. There are no PRow near the site. SUDs could take the form of swales, enhancing biodiversity. As with all larger sites, opportunities to create GI are increased.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Concave bend in road would make access on northern boundary difficult. 30mph would require junction spacing 42 x 2 x 42. The site access onto this road would also require a 'green belt' for site lines, which could be, for example, a swale. There are no public footpaths or cycle connections along either Mill Road or Buckland Lane.</p> <p>Buckland Lane has a derestricted speed limit, is a narrow country lane and is sunken between the fields. Access from the site onto this road would not be suitable.</p> <p>It is unlikely that the wider road network could accommodate additional traffic from the development that would be generated from either the small or large site. A Transport Assessment would need to be undertaken if all or half site as part of any planning application.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The site is located approximately 230m away from the nearest bus stop, which serves the No.14 service to Canterbury, Sandwich and Deal. The site is also adjacent to the Parish recreation ground.</p> <p>Large scale development ranging from 63 to 123 units would not be suitable in this village which has limited facilities and would be contrary to the spirit of Policy CP1, Settlement Hierarchy.</p>	
Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
<p>Analysis</p> <p>Although the site not within a flood risk area and is within walking distance from a bus stop, development of this site would not be suitable.</p> <p>A suitable access would not be suitable off of Buckland Lane and problematic from Mill Road. There are also no footways to the site and the impact of development on the wider road network would need to be demonstrated through a Transport Assessment.</p> <p>Furthermore the site is also in a location divorced from the main settlement and any development would have a detrimental impact on the wider landscape.</p> <p>Both sites would also create development of a scale (approximately 60 (small) to 120 (large) dwellings based on 30dph) that would not be appropriate for a rural village with limited services.</p>	
Consideration for inclusion in the Submission Document?	No

Wingham

Site Code WIN04	Address Land to the north of White Lodge, Preston Hill.	Parish Wingham	Overall SHLAA Score 29.5 – (+15 Years)	Area 0.44
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 13

Current Use SHLAA Score: 1.0 – Fully occupied multiple use (eg retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation

Description of Site

Irregular shaped site located at the northern most point of Wingham. The proposal is for a change to the Settlement Confines to enable residential development (of five units or less) on the garden to White Lodge. To do this the confines would have to be extended northwards.

The proposed confine line would, therefore, continue up the eastern side of Preston Hill and include three other properties to the south of White Lodge before stopping at Ashen Tree Cottages (a line of fourteen semi-detached dwellings) where it would then follow the northern boundary of White Lodge. The line would then follow the rear boundaries of the properties southwards to rejoin the existing line of the confine.

The existing residential properties consist of detached dwellings set within large gardens. They are located on a hill that rises to the north from the village. The properties are also raised in relation to the road, Preston Hill. Telephone lines run along Preston Hill. To the east of these properties there is a wooded area, Broom Hill, which is not included within the proposed confine change.

White Lodge is set within mature trees. The garden area, subject to possible development, appears to be located within a recess in the hill, possibly being former quarry. It consists of a lawn with a driveway running in an arc across the site. Although there are some younger trees along the western side of the site, it is visible from the road. There are, however, mature trees to the north, east and south. To the east there is open countryside.

To the south west of the proposed confine change, on the opposite side of the road, there is open countryside, which falls away to the west, and to the north west, there is a small area of residential development, which has developed between the junction of Wenderton Lane and Preston Hill. There is a tall bank opposite the northern most point of the proposed confine change.

Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation

The site that could be development is located approximately 120m away from the settlement confines.

Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints

Flood Risk

The site is located within Flood Zone 1, which would be appropriate for residential development.

Historic Environment

There are no Listed Buildings or Conservation Areas within or cover the site respectively. There is a Listed Building to west of the site, Highland Cottage, less than 50m from the area proposed for development. This is set back from the road set behind two semi-detached dwellings. Development is, therefore, unlikely to have a detrimental impact on the setting of this building.

Development would, however, have a detrimental impact on the setting of the village. The site is located on the edge of a rural village, where large spaces between buildings provide a soft edge. The spaces between buildings are just as important to the character of the village as the buildings themselves. The site was subject of an appeal in 1994, for three dwellings, which was dismissed by the Inspector as

development would ‘...have an unacceptable urbanising effect on the area and intensify a ribbon development beyond the physical confines of the village’.

Landscape Impact

The site is relatively flat in a slight cutting at the top of Preston Hill. It comprises a mature garden with some trees which are of interest. The general pattern of development here is of large houses with spacious gardens and any development would have to respect that to avoid having an adverse impact on the setting of Wingham. As such, this would be severely limiting on density.

Biodiversity

There will only be limited nature conservation interest and that will be mainly associated with the boundaries, namely birds and bats, although common reptiles may make use of less ‘gardened’ areas.

EIA Screening: too small to be necessary

Appropriate Assessment: too small to be necessary

Green Infrastructure

There is a PRoW, EE161 to the rear of the site that connects to a small circuit in Broom Hill. Development would not affect this. The biodiversity of the site as it is currently is unlikely to be adversely affected.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is within a derestricted area; however limited development of up to four properties would be acceptable through using one central access point.

Access to Services SHLAA Score: 3.0 – Site with at least 2 of 3 from: public transport, GP surgery and school within 10 minutes walk

There is an unmarked bus stop on Preston Hill adjacent to the site, which serves is the No.11 service to Canterbury and Westwood Cross in Thanet. This runs 5/6 times a day during weekdays. The GP Surgery would be a ten minute walk (although this would be up a steep hill on the return). The school is, however, further away, being located in the southern part of the village. There is a continuous footway to the village centre (including a range of facilities such public houses and a dentist).

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site, whilst at the northern most point of the village, is well related to local bus stops and is just within walking distance from the centre. The site is also located within the sequentially preferable Flood Zone 1 and one access for up to four properties would be achievable. The site was considered suitable at the Preferred Options stage for a change of Settlement Confine.

The site is, however, located on the edge of the village and development would, as described in a past Inspectors Report, ‘...have an unacceptable urbanising effect on the area and intensify a ribbon development beyond the physical confines of the village’. It is for this reason that the site is now considered unsuitable for further development and should not be included in the Submission Document.

Consideration for inclusion in the Submission Document?

No

Site Code WIN01	Address Land to the rear of The Paddock and either side of Petts Lane,	Parish Wingham	Overall SHLAA Score 30.5 – (11 – 15 Years)	Area 2.15 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 2.0 – Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>A generally rectangular shaped site, located to the north west of the village, which projects westwards into the countryside from the urban form of the village. The site rises to the north and consists of a mixture of scrub land to the east of the site and grassland to the west. The site appears to have limited land management. The boundary consists of scrub and trees.</p> <p>To the north of the site there is agricultural land. To the west there is a small allotment area, beyond which there is agricultural land. To the south there is a meadow and to the east there are residential properties that front onto the High Street. These range from of 1960's bungalows to historic buildings. The High Street forms part of the A257, the main route from Sandwich to Canterbury.</p> <p>The current access to the site is from the High Street via Petts Lane. Petts Lane is a rural track that crosses the site from east to west and provides access to the allotments and farmland beyond the site boundary (to the west) and is used as a rear vehicular access for four properties that front the High Street (to the east). Adjacent to the entrance to Petts Lane, outside of the site, there are two mature protected trees.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>Only a very small portion of the access, via Petts Lane, is located within the Settlement Confines, but the majority of the site is outside. Only the eastern boundary abuts the confine.</p>				
<p>Physical Constraints SHLAA Score: 4.0 – Within or partially within Flood Zone 1</p> <p>Flood Risk</p> <p>Although the site scored 4.0 in the SHLAA, the consultants who produced the report advised that this score should be amended to 3.0, given that the land south of Petts Lane (approximately one third of the site) is located within Flood Zone 2, with a very small proportion of this area within Flood Zone 3 (the south eastern corner). The access to the site from the High Street is also within Flood Zone 2.</p> <p>This situation changes slightly when Climate Change is considered, as Flood Zone 2 starts to encroach on land just north of Petts Lane and Flood Zone 3 encroaches further into land to the south. The access is still within Flood Zone 2.</p> <p>Land to the south of Petts Lane should not be considered for residential in the first instance.</p> <p>Historic Environment</p> <p>The proposed access is within the Wingham Conservation Area and there are seven Listed Buildings within 70m. The main site is adjacent to the Conservation Area (the eastern boundary abuts it) and to three of the Listed Buildings (108/109, 113 and 114 High Street).</p> <p>The Planning Inspector at the Dover District Local Plan Inquiry suggested that if the 1960s bungalows were to be removed, part of the site could be developed to improve the Conservation Area. Development would, however, reduce views of the rural landscape from this part of the Conservation Area. The Inspector concluded that the benefits of improving the Conservation Area through redevelopment would not outweigh the '...negative impacts that the unjustified release of open countryside would have on the character and appearance of the area and the setting of the Conservation Area'.</p>				

It is considered that development would be contrary to the historic growth of the village preventing glimpses of the countryside beyond and as such would have a detrimental impact on the setting of this important conservation area.

Any access to accommodate such large scale development would inevitably be detrimental to the character of the street scene due to highway requirements (such as footpaths, visibility splays and street lighting).

Landscape Impact

The site projects into the countryside surrounding the village at a sensitive edge where the land is rising from the valley floor. There is a north south fall of about 4m across the site. As this site is on higher ground on the hillside and despite the mature boundary hedgerows, any development would be prominent in the rural surroundings of the village. This would be most marked in middle distance views from the A257 to the west of the village. The Inspector concluded that development would remain ‘...a significant intrusion into and detract from the attractive setting of the village rather than result in a consolidation of existing pattern of development.’

There are two mature trees adjacent to the site boundary. One, a London Plane, is possibly of County significance in terms of its size in 1999. The Inspector commented that the trees are ‘...an outstanding feature of the Conservation Area, of wider visual benefit’.

Biodiversity

The site is rough grassland, developing scrub with overgrown hedgerows. Drains to the south of the site feed the River Wingham and would suggest a high biodiversity potential through habitat connectivity. To the north where the land rises the grassland is of less importance, however, there are hedgerows which could provide refuges, nesting sites and provide foraging and flight lines for bats. Surveys would need to be carried out to determine biodiversity interest and this would have to include habitat suitability for Great Crested Newts. The root protection area for the significant trees on the road frontage, in particular the London Plane is such that excavation for access and services would be severely limited.

EIA Screening: required due to size	Appropriate Assessment: contribution to the Thanet Coast SPA mitigation strategy would be necessary.
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Green Infrastructure

Petts Lane is a restricted byway EE169, but leads only to allotments and there is no further connectivity to the countryside. There will be biodiversity interest, although the nature of the site indicates that will require survey to determine the extent. Surface water flood risk could be alleviated by the use of swales, which may help counter biodiversity loss. However, overall, the urbanisation of this site will have its greatest effect on the loss of tranquillity of Petts Lane.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The proposed access to the site is too narrow and has very restricted sight lines due to the buildings on the High Street. It is not suitable to serve further development. Improved access is not feasible without removal of mature trees (in the Conservation Area) or removal of 1960s bungalows owned by the District Council.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

There are bus stops located adjacent to Petts Lane. These serve the 13/13A hourly route to Canterbury, Sandwich and Deal. The GP surgery is located within a five minute walk from the site (North Court Road), whilst the school is a slightly longer walk, approximately ten minutes to the south of the village (School Lane). The village centre, which has a range of facilities including public houses and a dentist, is only approximately 260m away.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
<p>Although the site is located in a village with a good range of local facilities, there are overriding reasons why this site is unsuitable for development.</p> <p>The first is that a suitable access cannot be achieved to the site from Petts Lane. Petts Lane has very poor sight lines due to existing buildings on the corner with the High Street. The only other options would be to remove the two protected trees or demolish four bungalows (owned by the Council), which, in either case, could not be considered as realistic options.</p> <p>The lower part of the site is also within Flood Zone 2, so alternative sites within Flood Zone 1 should be considered in the first instance. The northern part of the site is outside of Flood Zone 2, as it is on higher ground, but development here would have a detrimental impact on the wider landscape.</p> <p>This site was considered at the last Local Plan Inquiry and the reasons for not allocating this site for development (detrimental impact on the setting of the village and Conservation Area and poor access) still remain valid.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code NS01WIN	Address Land Fronting Gobery Hill, Wingham	Parish Wingham	Overall SHLAA Score 30 - (11 to 15 years)	Area 0.97 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Parallelogram shaped site, consisting of grazing land, located on the north eastern edge of Wingham. The site protrudes into the countryside from the urban form and stops at the boundary of a residential property (Gobery Hill), approximately 200m from the settlement confine. The site is located on a ridge that rises to the east, so the land starts to fall away to the south and west. Running along the northern boundary of the site there is the A257 (know as Gobery Hill at this point), which follows the line of this ridge. The western side of the site, adjacent to the road, is raised in relation to the road and the boundary treatment here consists of wooden poles and wire fencing. As the road rises up Gobery Hill (moving eastwards), the difference in levels reduces to a point where both the site and road are flush. There is an access to the land at this point. The eastern side of the site then starts to rise again in relation to the road. Evergreen trees have been planted along this part of the boundary. There are agricultural fields to the north of the A257. To the west and east there are residential properties. The boundary treatment here consists of trees and hedgerow. Those to the east are within the Settlement Confines. There is no physical line on the ground that would delineate the southern boundary, as drawn on the plan.				
Policy Alignment SHLAA Score: 4.0 - Completely outside development envelope with no other designation or non housing designation The site is outside of the settlement confines. Only the eastern boundary abuts the confine.				
Physical Constraints SHLAA Score: 8.0 - No obvious physical constraints Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development. Historic Environment The western boundary abuts the Wingham Conservation Area. There are also three Listed Buildings (113/114 High Street (Hillside Cottages) and 104 High Street) within 50m of the western boundary of the site. Although this boundary is heavily screened by trees, the site rises towards the east. New development would be, therefore, rising in relation to the Conservation Area and would be overpowering. Development would therefore have a detrimental impact on the setting of the Conservation Area. The open space on the edge of the village is also important for the setting of the Conservation Area. Such spaces are expected in rural locations where development density reduces and if developed would urbanise the edge of the village. This would also be detrimental to the setting of the village and the conservation area. Landscape Impact				

The site is highly visible and is a major entrance into Wingham village from the north, with a SW panorama ranging across the wider countryside, taking in the spire of the church, to a focal point of the listed building on the corner of Gobery Hill and Preston Hill. To the NW there is a backdrop of more modern houses but these only merge within the village itself, beyond that they are fronted by fields. Conversely, leaving the village, there is a typical reduction in building density with an increasing impact of green fields and agriculture against a backdrop of trees. The resultant character of the village edge is sensitive, but in good condition and has good visual amenity. Development on this site would severely impact on the visual amenity, with loss of views to the SW and degrade the character of the village edge, into one of urban sprawl.

Biodiversity

There may be common reptiles present on the site, but little otherwise in respect of biodiversity.

EIA Screening: necessary due to size?

Appropriate Assessment: necessary to contribute to the Thanet Coast SPA Mitigation Strategy and potentially impacts on Sandwich Bay must be considered.

Green Infrastructure

The site provides in respect of GI in the ambient landscape setting of the village. There is no potential for developing recreational walking of any significance through site development. Surface water drainage would be a significant issue to consider. Development could not enhance GI.

Proximity to Road Network SHLAA Score: 5.0 - Less than 5 metres from road assuming direct access to site

Gobery Hill is subject to a speed limit change within the extent of the site frontage (30mph/National Speed Limit). Sight lines are unlikely to be easily achieved towards the west of the site due to the road alignment and frontage development. There is no footway on the development side of the road but one exists on the opposite side. Gobery Hill is on a bus route and the site is within walking distance of village amenities. There is a level difference between the site and the carriageway but this is not significant. A new footpath along the development frontage to link with that leading into the village would be required.

Access to Services SHLAA Score: 3.5 - Site within 10 minutes walk of bus, GP surgery or school

The nearest bus stops (for routes 13 & 13a, hourly to Sandwich, Deal and Canterbury) are approximately 110m away from the eastern end of the site. The Doctors surgery is nearly 400m away. The school is located at the southern end of the village. The village centre, which has a range of facilities including public houses and a dentist, is approximately 370m approximately m away.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 4.5 - Single Private Ownership

Analysis

Although the site is not within flood zones 2 and 3 and is within walking distance of public transport and local services in the village, the site is located in a highly visible location which, if developed, would have a detrimental impact on the wider landscape, the setting of the village and on the Wingham Conservation Area.

Consideration for inclusion in the Submission Document?

No

Site Code SHL010 (WIN02)	Address Builders Yard, 67 High Street, Wingham.	Parish Wingham	Overall SHLAA Score 24.5 – Undeliverable	Area 0.85 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (eg retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
<p>Description of Site</p> <p>An irregular shaped site located on the eastern side of Wingham. The site consists of a narrow section, close to the built form of Wingham, which then opens up to a larger area further east. The site gently falls to the east.</p> <p>The narrow section consists of a number of old corrugated sheds of one and two stories, reflecting its previous use as a builders yard. In light of the previous use, there could be contamination in this area. The surrounding uses at this point consist of, to the west, shops and residential along the High Street, related gardens to the north and residential to the south.</p> <p>The larger section of the site (where the site become considerably wider), consists of undeveloped land with solid tree cover. The neighbouring uses consists woodland to the north and grazing land / farmland to the east and south. The River Wingham runs along the eastern boundary of the site.</p> <p>The site is accessed by a long narrow entrance from The High Street, which is also used by a neighbouring property. A small section of the site (the area with the sheds) was included in the Preferred Options document as a change to the settlement confines.</p>				
<p>Policy Alignment SHLAA Score: 6.0 – Partially outside development envelope with no designation</p> <p>The only part of the site located within the confines is the narrow access way. The remainder of the site is located outside of the Settlement Confines.</p>				
<p>Physical Constraints SHLAA Score: 2.0 – Within or partially within Flood Zone 3</p> <p>Flood Risk</p> <p>The area to the west (the wooded area) is within Flood Zones 2 and 3a, as identified in the SFRA.</p> <p>Historic Environment</p> <p>The site is adjacent to a Conservation Area and there are Listed Buildings located on either side of the access. This is a very sensitive site located on the edge of the countryside and any development would need to respect this.</p> <p>Landscape Impact</p> <p>If the whole site was developed, there would be a negative impact on the landscape character. The eastern part of the site is heavily treed and these would have to be removed for any development in this area. Large scale development would also result in urbanisation on the edge of a rural village and this would be out of character with the grain of village.</p> <p>If the entire site were developed, including that located within the floodplain the development would be partially visible from the existing properties in St Mary’s Meadow. Small scale development may be acceptable on part of the site which has already been developed.</p> <p>Biodiversity</p> <p>The area SHL010, un-accessed, is situated between the River Wingham and a looping drain. Although partially tipped upon (Google Earth 2008, accessed 2011) the majority of this area is</p>				

<p>wooded and could be 'Wet Woodland', a UK Biodiversity Action Plan priority habitat. A full Biodiversity Assessment of this area is necessary. The Council's Green Infrastructure Strategy has indicated that this is an area of reinforcement, based on the biodiversity corridor along the river. The remainder of the site, WIN 02, comprises primarily a mix of buildings which although not especially suitable for bat roosting, need assessment for such.</p>	
<p>EIA Screening: whole site is large enough to require screening</p>	<p>Appropriate Assessment: whole site is large enough to require contributing to the Thanet Coast SPA Mitigation Strategy.</p>
<p>Green Infrastructure</p> <p>The River Wingham has been identified as one of the E-W connections in the district to be reinforced. This aspect of GI is primarily to provide biodiversity connectivity and a movement corridor. There are no PRow in this area. Development of the whole site would compromise future GI potential and must be considered to be negative in terms of sustainability.</p>	
<p>Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility</p> <p>The access could not be adopted by Kent Highways and would only be suitable for development under five units.</p> <p>An acceptable access could, therefore, be created for one or two dwellings. The bin access should be within 25m, the access road to the site is about double this distance. As there is a narrow access to the site, a turning area would also be required. However, there may be the potential for an in and out access given that there is another narrow access way which runs alongside 'Telephone House'.</p>	
<p>Access to Services SHLAA Score: 6.0 – Within 5 minutes walk of bus and GP surgery and school</p> <p>All three main services are within a 5 minute walk. In addition, other services such as newsagents, banks, public houses and dentist are all within a five minute walk.</p>	
<p>Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost</p>	
<p>Ownership SHLAA Score: 3.5 – 2-3 Ownerships</p>	
<p>Analysis</p> <p>Development of the whole site would not be acceptable as this would result in the loss of important trees and biodiversity habitat and would have a detrimental impact on the wider landscape, the setting of Wingham Conservation Area and neighbouring Listed Buildings. The eastern part of the site is also within an area at risk of flooding. A suitable access would also not be achievable for a development of this size given the restrictions (Listed Buildings) on the access.</p> <p>Development of part of the site that has already been developed is considered to be acceptable if less than five units. The site was identified in the Site Allocations Preferred Options, Development Plan Document, as an amendment to the village confines, which would allow (subject to Development Management considerations) minor development on this small area. There are no overriding arguments to change this.</p> <p>The only addition to this amendment would be to ensure that there would be remediation of natural area if the site were to be developed.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Amendment to confine.</p>	<p>Yes</p>

Site Code WIN02C	Address Land north of College Way, Wingham	Parish Wingham	Overall SHLAA Score This site was not considered in the SHLAA as it was considered too small.	Area 0.06 ha
		Hierarchy Local Centre		Indicative No. of units @ 30 dph = 2
Current Use --				
Description of Site Rectangular shaped site consisting of lawn, which lies at end of a 1970's housing development. The properties alongside the access to this land are bungalows. The western boundary of the site has recently been re-fenced, and our understanding is that at present there is no visible access to the site.				
Policy Alignment -- The site is located immediately adjacent to the Settlement Confines on three sides.				
Physical Constraints --				
Flood Risk The site falls within Flood Zone 1, which would be appropriate for residential development.				
Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site.				
Landscape Impact The site is virtually enclosed by housing and other garden extensions. There would be no adverse impact on landscape if this were included in the confines, although it would lead to further pressure from other properties to extend their gardens.				
Biodiversity There may be some biodiversity interest associated with gardens such as slow worms.				
EIA Screening: No, too small			Appropriate Assessment: No, too small	
Green Infrastructure (Nick to provide)				
Proximity to Road Network -- Access to the site would be via College Way, which would be acceptable for a limited number of dwellings. It would be necessary to clarify whether there is a ransom strip between College Way and the land put forward for consideration.				
Access to Services -- The nearest bus stop is located on the High Street (which serve Nos.13, 13A and 14 to Canterbury, Sandwich and Deal) and both the GP surgery, school and village centre (including a bank, dentist and public houses) are located within a five minute walk.				
Market Attractiveness --				
Ownership --				
Analysis The Council does not as a rule allocate land less than five units. An amendment to the confine would, however, enable development. The land is being used as a garden associated with a neighbouring property. It is a small site that, if				

development were to come forward after being included within the Village Confines, could accommodate two dwellings without any adverse impact on the landscape or highway network.

Consideration for inclusion in the Submission Document?

Yes

Amendment to Settlement Confines

Site Code SHL003	Address Land to the south east of Wingham Court.	Parish Wingham	Overall SHLAA Score 36 – (6-10 Years)	Area 0.38Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 3.0 – Fully occupied single use (eg factory, school)				
<p>Description of Site</p> <p>An irregular shaped piece of land at the entrance to Wingham Court, consisting of a tennis court surrounded by mature trees and informal lawns. The site boundary consists of a mature hedge on the western boundary (following the line of Canterbury Road) but is less formal on the remaining boundary, which consists of a variety of trees, hedging and fences.</p> <p>The site lies on the southern edge of the village with grazing paddocks to the south. The site is within the Settlement Confines. There is a Right of Way that runs across the site from the west to the east.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site is within the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development. The site is, however, within 40m from Flood Zone 2. A site specific Flood Risk Assessment may be required.</p>				
<p>Historic Environment</p> <p>The site lies within the Wingham Conservation Area and two buildings, Wingham Court and the Chicken House located to the north of the site, are Listed Buildings. Development would have a detrimental impact on the rural character of the Conservation Area and setting of the Listed Buildings through the loss of open space that makes a valuable contribution to the special character of the former farmyard. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.</p> <p>Development of this site would therefore introduce hard urban form into a leafy edge to the village. Development would also inevitably require the removal of mature trees and possibly the hedge, all of which create the unique character of this particular area.</p> <p>A Scheduled Monument lies due south on the adjacent paddocks. The Scheduled Monument is on the site of a Roman Villa, so there could be remains on this site.</p>				
<p>Landscape Impact</p> <p>The hedge boundary is important to reduce the impact of development on the wider landscape and mature trees would need to be retained.</p>				
<p>Biodiversity</p> <p>Apart from the tennis court, the site is heavily treed, restricting biodiversity interest. The locality does indicate that bats may use the trees for foraging, or even roosting.</p>				
EIA Screening: too small to be needed.			Appropriate Assessment: too small to be needed.	
<p>Green Infrastructure</p> <p>The site is crossed by PRow footpath EE48, providing a pleasant link E-W across the south of</p>				

Wingham. It is not considered that development would cause significant harm to this asset.

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is adjacent to a primary road (Canterbury Road) and access would be onto this. The location of the site entrance is not acceptable as there would be a blind corner for turning right into site. Very poor sight lines make crossing the road to the site very dangerous.

A speed survey would be required from the developer before any development is considered due to the poor access.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The school is adjacent to the site and bus stops on Canterbury Road are less than five minutes away. These serve the 13, 13a and 14 bus hourly services to Canterbury, Sandwich and Deal. The local Primary school is only 10m away from the site. Wingham provides a range of facilities in its centre (including dentist and Doctors surgery) but this is approximately 10 minutes walk away.

Market Attractiveness SHLAA Score: 4.0 Higher Value, High Cost

Ownership SHLAA Score: 4.5 – Single Private Ownership

Analysis

The site is close to public transport and local facilities but is located in a sensitive location within the Wingham Conservation Area. The determining factor as to whether or not the site should be allocated is whether development would be suitable and of the quality and appropriateness required in this very sensitive location.

Development of the site would result in the loss of an open space (including the removal of trees and possibly part of the hedge), which is important for the setting of the Conservation Area and Listed Buildings. Development would, therefore, be detrimental to the Conservation Area. The access is also poor and it would be extremely dangerous to have an access to the site from a busy primary road.

It is for these reasons that the site is should not be allocated in the Land Allocations Document. Development is, however, within the confines any development could be pursued through a planning application.

Consideration for inclusion in the Submission Document?

No

Site Code LDF033	Address Land adj to Wingham Primary School (Lady Hawarden site)	Parish Wingham	Overall SHLAA Score 33.50 – (6-10 Years)	Area 0.25ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 2.0 – Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Rectangular site, located within the settlement confines, consisting of maintained grass land with some brambles to the west. The site is heavily screened with trees on all boundaries. The site gently falls away from the eastern to the western boundary. There is a slight change of level between the site and School Lane.</p> <p>A Public Right of Way runs along the southern boundary and School Lane runs along the eastern boundary. This is the only obvious access onto the site. Overhead telephone wires cross the site.</p> <p>The garden of Wingham Court lies to the north and west of the site and Wingham School lies to the south. Residential properties lie to the east.</p>				
Policy Alignment SHLAA Score: 7.0 – Sites within development envelope (settlement boundaries) with no designation				
The site lies within the Settlement Confines as a result of the 1998 Local Plan Inquiry.				
Physical Constraints SHLAA Score: 6.0 – Sites with small areas of sloping land, woods or hedgerows, to be addressed				
<p>Flood Risk</p> <p>The site falls within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>The site lies within the Wingham Conservation Area and development of the site would have a detrimental impact on this designation as the site currently provides a ‘green wedge’ within the urban form and is an integral part of the street scene of School Lane. This space is also important to the setting of the former farmyard at Wingham Court. The spaces between buildings are just as important to the character of the Conservation Area as the buildings themselves.</p> <p>A Scheduled Monument lies to the south east on the paddocks. The Scheduled Monument is on the site of a Roman Villa, so there could be remains on this site.</p>				
<p>Landscape Impact</p> <p>The location, although close to the edge of the village, is surrounded by either other buildings or vegetation. The site is therefore well screened and there would only be a limited impact on the wider landscape (assuming trees are retained).</p>				
<p>Biodiversity</p> <p>The site is maintained lawn with some scrub development. Such an area may support common reptiles. The rate of flow of water from Wingham Well to the River Wingham is unknown, but if slow, a habitat suitability index for Great Crested Newts for this site is needed.</p>				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be needed	
<p>Green Infrastructure</p> <p>PRoW footpath EE48 follows the southern border of the site, but is contained within a hedgerow. Development of this site should not adversely impact this path.</p>				

Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site

The site is located adjacent to Church Road but additional works would be required to ensure safe access to the site. These works would include aligning site and road levels and the removal of trees along the whole eastern boundary.

Whilst sight lines between School Lane and Canterbury road are not ideal, there is no crash record to suggest a problem at this junction and School Lane serves several properties and the Village Hall with a reasonable sized car park. In view of this it is not anticipate that an additional 7 units would be likely to create any capacity problems at the junction and that the trips generated by the proposal could be safely absorbed within the existing local traffic entering and existing School Lane.

Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes walk

The local primary school is adjacent to the site and there are bus stops on Canterbury Road less than five minutes walk away (which serve bus routes No.13 and No.14, which run hourly to Canterbury, Sandwich and Deal). Wingham provides a range of facilities in its centre (including dentist and Doctors surgery) approximately 5 to 10 minutes walk away and is, in principle, an appropriate location for further development.

Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost

Ownership SHLAA Score: 5.0 – Single Public Sector Ownership

Analysis

Although the site was identified in the Site Allocation Document, the reassessment has indicated that there are concerns relating to the possible detrimental effect on the Conservation Area (which has also been reflected in the representations received during the Preferred Options consultation).

This site was originally considered at the 1998 Local Plan Inquiry. The issues related to whether the site should be included within the Village Confines and whether the site (together with Wingham Court) would be suitable for development. With regard to the latter, the Planning Inspector concluded that, due to its size, the site should be considered on its merits through the development control process and that site specific provision would be inappropriate.

The determining factor is as to whether development would be suitable and of the quality and appropriateness required in this very sensitive location. The sensitivity of the site could, therefore, result in a small development of less than five units. For this reason it is suggested that the site is not allocated in the Land Allocations Document and, as the site is within the confines, any development should be pursued through a planning application.

Consideration for inclusion in the Submission Document?

No

Site Code WIN03	Address Land to the south of Staple Road and north of Goodnestone Road	Parish Wingham	Overall SHLAA Score This site was not in the SHLAA as it was considered too small.	Area 0.12 Ha
Current Use --				
<p>Description of Site</p> <p>Rectangular, flat site located on the edge of the built form at the south eastern corner of Wingham. The site is currently being used as part of a larger horse paddock. The boundary to the south is fenced, whilst to the north it is screened from Staple Road by established hedgerows. Staple Road is approximately half a metre lower than the site.</p> <p>There are two properties located adjacent to the site on the western boundary. The current access to the site is adjacent to these properties onto Goodnestone Road. To the north there is a new rural housing exception scheme. The boundary to the south adjoins the engineering works, where there are a number of heavy industrial uses, which would generate noise. There is no physical boundary to the east and the land continues as paddocks until the next line of dwellings (1 Staple Road) approximately 150m away.</p>				
<p>Policy Alignment --</p> <p>The site is located outside, but immediately adjacent to, the Village Confines. It is not subject to any other designation.</p> <p>The site lies adjacent to an existing employment use; any development may be affected by activities on that site, which at times can be noisy and intrusive.</p>				
Physical Constraints --				
<p>Flood Risk</p> <p>The site is located within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site.</p> <p>A past planning application (DOV/89/00801) was refused on the basis that the proposal for one house would result in the undesirable extension of development onto the open farmland.</p> <p>Landscape Impact</p> <p>The site is bounded on two sides by buildings (two properties and the Engineering Works) and on the third side by a substantial hedgerow. Therefore, the impact on the wider landscape would be limited.</p> <p>A rural housing exception scheme lies immediately opposite the site and this site would continue the line of development southwards. If development were to take place then it would be important to retain a soft edge to the east by planting.</p> <p>Biodiversity</p> <p>The biodiversity potential of this site would be limited.</p>				
EIA Screening: too small to be needed			Appropriate Assessment: too small to be needed.	
<p>Green Infrastructure</p> <p>There is a PRoW, footpath EE58 that goes along the western boundary. This would need to be incorporated into any development. Otherwise the site is too small to contribute to GI.</p>				

Proximity to Road Network --

Access to the site from Staple Road would be difficult given the proximity of the Fire Station and Miller Close. Although the 1998 planning application was refused on the basis that a new access would create an additional hazard it is now considered that there is potential to achieve access from Goodnestone Road given that this is within a 30mph zone.

There are, however, no footways. The footway starts outside No.19/20 Court Flats, Goodnestone Road, which is approximately 30m away.

An agricultural access to serve the horse paddocks could be provided (as an alternative to the existing one on Goodnestone Road) on Staple Road with a minimum junction spacing of 15m from Miller Close.

Access to Services --

The nearest bus stops are located at the junction with Staple Road and Goodnestone Road (less than a 5 minute walk). These serve the No. 14 hourly service to Canterbury, Sandwich and Deal. The school is also located within a five minute walk from the site, whilst the GP surgery is a slightly longer walk at approximately ten minutes. The village centre, with a range of shops and facilities (including a dentist and bank), would also take approximately five to ten minutes to walk to.

The site also borders Wingham Engineering Works, an important local employer. The recreational ground is also opposite the site on Goodnestone Road.

Market Attractiveness --

Ownership --

Analysis

This is a small site (four units) located on the edge of the village. As a rule the Council does not allocate small sites but could amend the Settlement Confines so that limited development could take place.

Although the site is located on the edge of the village, the site is located within walking distance of the local school and, although would take a little longer, the village centre. It is also considered that development of up to four dwellings would not have a detrimental impact on the wider landscape due to the existing built form, which creates a backdrop, and the existing hedge line. This would be further enhanced by creating a soft edge along the eastern boundary.

Although past planning applications have been refused on the grounds of access, Kent County Council Highways has confirmed that an access onto Goodnestone Road can be achieved.

Consideration for inclusion in the Submission Document?

Yes

Settlement Confine change.

Site Code SHL061	Address Wingham Engineering Works, Goodnestone Road, Wingham	Parish Wingham	Overall SHLAA Score 26 - Undeliverable	Area 1.85 Ha
		Hierarchy Local Centre		
Current Use SHLAA Score: 1.0 – Fully occupied multiple use (eg retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Triangular piece of land located to the south east of Wingham. The site consists of mixed building types, from large sheds to port-a-cabins, and a mix of industrial uses, some of which are noisy. The site is unscreened and is located on rising ground that is highly visible within the wider landscape. The site is adjacent to paddocks and agricultural land to the north and east. Goodnestone Road runs along the south western boundary and beyond this there is a recreation ground. The site may be contaminated due to previous uses (associated with Wingham Colliery). An electrical substation is located on the site and telephone wires run alongside the site/ Goodnestone Road. The representation has suggested a mix of residential and employment on the site (consolidating the employment onto a smaller part of the site) but has not indicated how this would be accommodated on the site.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is located outside of the Settlement Confines. The nearest point is approximately 40m from the confine. The site is also existing employment land, the loss of which would be contrary to Policy DM2 in the adopted Coe Strategy.				
Physical Constraints SHLAA Score: 3.0 – Within or partially within Flood Zone 2 or with pylons and utilities or contamination issues Flood Risk The site is located in Flood Zone 1, which would be appropriate for residential development. Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. Whilst it is not considered to be a major concern, there may be interest in connection with the industrial heritage of the site (associated with Wingham Colliery). There is also concern that the mix of housing and industrial uses would not be compatible. The representation has not indicated where the residential element would be located on the site in relation to the industrial uses but these uses, if retained as the representation described, are a source of considerable noise. Residential development close to this would not be acceptable. Landscape Impact Currently, the condition of the buildings is poor; they have a detrimental impact on the landscape given that the site is in a sensitive location with no screening. Development of the site may provide an opportunity to improve the landscape impact by removing the larger sheds and replacing them with smaller residential units and/or less heavy employment uses.				

Biodiversity The potential for biodiversity is low – confined to the peripheral areas of the site.	
EIA Screening: needed due to size	Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be required.
Green Infrastructure The site currently does not contribute to GI. Development could allow enhancement in respect of recreation and biodiversity.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site A vehicle access would be acceptable subject to moving the 30mph speed limit to the proposed access (the access is currently in a derestricted zone). Development would require new footway to Wingham. The wider road network could accommodate additional traffic from the development.	
Access to Services SHLAA Score: 4.5 – Site with at least 2 of 3 from: public transport, GP surgery and school within 5 minutes The nearest bus stop is located at the junction with Staple Road and Goodnestone Road. These serve No.14 route, which runs hourly to Canterbury, Sandwich and Deal. There are no footways, however, from the site until the bus stops are reached. The SHLAA score reflects the fact that the school is located within a five minute walk from the site, whilst the GP surgery is a slightly longer walk being approximately ten minutes. The village recreational ground is located opposite the site.	
Market Attractiveness SHLAA Score: 4.0 – Higher Value, High Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis Although a suitable access can be achieved, is outside the flood risk Zone 2 and 3 and development could improve longer landscape views, there are doubts over the compatibility of introducing residential development within an employment site. The current industrial units produce noise and air pollution that would not be that would not be compatible with residential amenity. The loss of important employment land in the rural location and the additional traffic on the wider road network do not outweighed the benefits redevelopment of the site could bring to the setting of the village.	
Consideration for inclusion in the Submission Document?	No

Woodnesborough

Site Code SHL093	Address Land between Marshborough Road and Beacon Lane, Woodnesborough	Parish Woodnesborough	Overall SHLAA Score 27.5 (Undeliverable)	Area 0.24 Ha
		Hierarchy Village		
Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation				
Description of Site Rectangular site located between Marshborough Road and Beacon Lane. The site consists of allotment/small scale cropping and one structure (along the southern boundary), used for storage. The site has frontages onto Marshborough Road (north) and, in part, Beacon Lane (south). The majority of the southern boundary follows the line of a track, which runs from Beacon Lane to the rear of properties fronting Beacon Lane (No.s 1 to 4). To the east there is a large shed, known as Lasletts Yard, which shares the accesses with this site and is also being considered for development (see form for LDF03). There are residential properties to the west, north west and south of the site. To the north, on the far side of Marshborough Road, there open fields. There are telephone posts running along the northern boundary.				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation The site is separated from the settlement confine by Beacon Lane.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints Flood Risk The site is within Flood Zone 1, which would be appropriate for residential development. Historic Environment There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Building, St Mary’s Church is approximately 240m away. Development would not impact on the setting of the church. Woodnesborough, however, consists largely of ribbon development, with green spaces between, in a rural setting. Development fronting Marshborough Road could intensify the built form in this area and alter the grain of the settlement. This would be detrimental to the setting of the village in the wider countryside. Landscape Impact The site is well contained behind the hedgerows and existing buildings to the west and east (Lasletts Yard). If the hedgerows were retained landscape impact would be acceptable. There may be pressure, however, to remove these hedges for access onto the site. This would open up the site and the urban form would be more visible, which would have a detrimental impact on the wider landscape. Biodiversity Common reptiles may use the site and bats may use the boundary hedges, therefore surveys for these groups would be required as part of any application. There is a pond within 300m of the site and as the northern part of the district is known to support Great Crested Newts, a Habitat Suitability Index (HSI) for this site is needed.				
EIA Screening: Too small to be required			Appropriate Assessment: too small to be required.	

Green Infrastructure	
Woodnesborough is well-endowed with footpaths and one, PRow EE217 runs alongside the southern boundary of this site. The topography of the site indicates that care with surface water management is needed. Overall the site is GI neutral.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site	
A shared access, for both this site and Lasletts Yard could be achieved. Alternatively private drives, to serve up to 5 dwellings on each, could be established from Marshborough Road.	
There is, however, a lack of footways in this vicinity.	
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk	
The SHLAA score reflects the close proximity (approximately 30 metres away) to a bus stop on Oak Hill (which serves the No.13A route, hourly to Sandwich and Canterbury).	
Market Attractiveness SHLAA Score: 2.0 – Medium Value, High Cost	
Ownership SHLAA Score: 5.0 – Single Public Sector Ownership	
Analysis	
The site is located in the sequentially preferable Flood Zone 1 and is within easy walking distance of a bus stop. A suitable access to the site should also be achievable, whether this is a shared access with the adjacent site or by private drives from Marshborough Road.	
There is concern, however, that development along the frontage of Marshborough Road would have a detrimental impact on the wider landscape and setting of the village by increasing the intensity of the built form and altering the grain of the settlement (primarily ribbon development). To ensure that this impact is reduced, development should reflect the low density of the surrounding built form and the access should be shared with any development at Lasletts Yard. The existing hedge should also be retained along Marshborough Road.	
It is also suggested that the settlement confine be changed to include the two sites and neighbouring properties.	
Consideration for inclusion in the Submission Document?	Yes
Change confine, to be considered with LDF03, retain hedgerows, bat surveys and Habitat Suitability Index for Great Crested Newts.	

Site Code LDF03 (WOO05)	Address Farm units on junction of Marshborough Road and Beacon Lane, (Laslett's Yard)	Parish Woodnesborough	Overall SHLAA Score 31 (11-15 Years)	Area 0.17Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 5
Current Use SHLAA Score: 5.0 - Vacant building not in commercial use including lock ups etc				
<p>Description of Site</p> <p>Triangular shaped site located in an elevated position at the junction where Marshborough Road meets Beacon Lane (the site fronts both roads). The site is flat and has one farm building incorporating three storage units. This is located in the centre of the site and is constructed partly of brick but also corrugated iron sheeting. The site has concrete hard standing flush with Marshborough Road on the north east boundary and this continues around the building to the south where there is an access to Beacon Lane. There is a hedge on the southern boundary with Beacon Lane.</p> <p>To the north west of the site there is an area for small scale cropping/allotment (see SHL093). Beyond this land there are residential properties. There are further residential properties to the south and open fields (incorporating horse paddocks) to the north.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines.</p>				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Building is St Mary's Church which is approximately 220m to the south east of the site. Development would not impact on the setting of this historic asset.</p>				
<p>Development of this site could improve the appearance of this aspect of the village, replacing the old shed with new sensitively designed residential development, reflecting the existing grain and built form of the village.</p>				
<p>Landscape Impact</p> <p>The site occupies a prominent elevated position on the edge of the village. Whilst there is planning history relating to the site (planning permission (DOV/99/1067) for the development of five dwellings on this site was refused (due to being outside the settlement confines and would be detrimental to the character of the area) and the subsequent appeal was dismissed at appeal) it is now considered that development of this site could improve the appearance of this aspect of the village, replacing the old shed with sensitive residential development.</p>				
<p>At the time of the site was submitted to the Council it was in occupation. It is now believed that it is vacant.</p>				
<p>Biodiversity</p> <p>The site is hard-standing. It is unlikely to support wildlife although a bat survey should be carried out due to the good surrounding habitat and the need for demolition.</p>				

EIA Screening: too small to be considered, even in conjunction with SHL093	Appropriate Assessment: too small to be considered, even in conjunction with SHL093.
Green Infrastructure Woodnesborough is well-endowed with footpaths and although there are none on the site, three PRow are very close. The site provides no GI currently, so development could not be negative.	
Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site Access would be possible from the northern end of the site on Marshborough Road. Improvements to sight lines at the junction of Beacon Lane would, however, be required. The current access onto Beacon Lane would not be suitable for access as there are inadequate sight lines. The lack of footways is also a constraint.	
Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk The SHLAA score reflects the fact that the site is adjacent to an unmarked bus stop (Oak Hill), which serves No.13A (hourly to Canterbury and Sandwich).	
Market Attractiveness SHLAA Score: 2.0 – Medium Value, High Cost	
Ownership SHLAA Score: 4.5 – Single Private Ownership	
Analysis The site is located in an elevated position on the edge of the village. The removal of the old shed and its replacement with new sensitively designed residential development, would improve the appearance of this aspect of the village. The site is also located within the sequentially preferable Flood Zone 1, is adjacent to a bus stop and a suitable access can be created. Development of the site would, however, need to be considered with the adjacent site SHL093 to ensure a comprehensive scheme is developed.	
Consideration for inclusion in the Submission Document? Amend confines, policy with design criteria	Yes

Site Code SHL048	Address Land between Stoneleigh and Nine Acres, The Street, Woodnesborough	Parish Woodnesborough	Overall SHLAA Score 23 (Undeliverable)	Area 1.01Ha
		Hierarchy Village		Indicative No. of units @ 30 dph = 30
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Long and thin, irregular shaped site located between the two developed areas of Woodnesborough. It is understood that the site was used for market gardening. The site has now been cleared in preparation for a planning application (DOV/11/00965 – not yet determined). There are agricultural fields to the north and south of the site. The site is well screened from the road (the site is raised above the road and has hedgerow running along the boundary) and is not particularly visible from the footpath running to the south (there is a hedgerow running along the boundary). St. Mary's Church is located immediately to the south of the site. At this point the site has narrowed significantly.</p> <p>The Parish Hall is located opposite the site at the northern most point. The Parish Council have suggested that this hall is no longer suitable and that they are seeking a new location to build a community building and playing pitch (their current playing pitch is leased). This is their preferred location for a new village hall.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines of east and west Woodnesborough.</p>				
<p>Physical Constraints SHLAA Score: 6.0 – Site with small areas of sloping land, woods or hedgerows to be addressed</p> <p>Flood Risk</p> <p>The site is located in Flood Zone 1, which is appropriate for residential development.</p> <p>Historic Environment</p> <p>There are two Listed Buildings near to the site. The village hall opposite (to the north) and the church to the south. Development of the site would have a detrimental impact on the setting of these Listed Buildings through the loss of green open spaces. The site contributes to the open character of the village edge and it is the loss of this space that would have a detrimental impact on the heritage assets. Development would also result in the coalescence of the two areas of Woodnesborough, which would be detrimental to the rural, open and fragmented character of the settlement.</p> <p>Landscape Impact</p> <p>Although the site is currently well screened, any development would introduce urban form (roofscape, street lighting) into a prominent rural location. The character of Woodnesborough is partially dependent on its rural, loose-knit arrangement of groups of dwellings with sizeable open spaces between. Development would lead to a coalescence of two of these character elements which would have a detrimental impact on the rural character of the village in its landscape setting.</p> <p>Biodiversity</p> <p>The proximity to the church (and potential roosting) would suggest that the tree and hedge line here could be important for bats, both for foraging and as flight lines. There would be a bird interest in the trees and hedgerow on the site boundary and the margins of the field and scrub could support common reptiles. Development would have little impact if these were retained. Due to the proximity</p>				

of water bodies (within about 300m) a Habitat Suitability Index for Great Crested Newts would need to be drawn up as part of any planning application.	
EIA Screening: necessary due to size	Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary.
<p>Green Infrastructure</p> <p>The site is likely to provide a biodiversity resource that needs investigating. The footpath to the south (PRoW EE220) is one of a complex joining the disparate elements of Woodnesborough and has significance in being a direct link to the church. It would be important to protect its ambience. Development of the site could create some surface water flooding issues as it lies above the existing carriageway. Swale-type SUDs would be restricted due to the root protection areas needed for the boundary trees and hedge. Overall, development would risk harming the existing GI.</p>	
<p>Proximity to Road Network SHLAA Score: 2.0 – Access investment required in a rural area including site visibility</p> <p>The site is approximately two meters above the highway towards the western end of the site but this height difference reduces to the east. An access would be achievable at the eastern end but this would require earth movements and the removal of part of the hedgerow in this location to ensure acceptable sightlines could be achieved. The current access (adjacent to Stoneleigh) would not be acceptable due to poor sightlines.</p> <p>It has been suggested that development could introduce a new public footpath in this location, along The Street in order to link together the two separate parts of Woodnesborough.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The SHLAA score reflects the fact that there is a bus stop within five minutes walk from the site.</p>	
<p>Market Attractiveness SHLAA Score: 2.0 – Medium Value, High Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>The site is located in the sequentially preferable Flood Zone 1, a suitable access could be created onto the site and if development retained the hedgerow cover along the road and to the rear, the impact of dwellings in the rural location would be reduced. Development of the site would enable the construction of a new village hall and sports field that would meet the needs of the local community. The site is also supported by the Parish Council.</p> <p>There are, however, concerns that development would change the character of the village through the loss of open space and the introduction of urban form between the two parts of Woodnesborough. This would be detrimental to the character of the village and the setting of the Listed Buildings.</p>	
<p>Consideration for inclusion in the Submission Document?</p> <p>Retention of hedgerow</p> <p>Heritage assets</p> <p>Habitat Suitability Index for Great Crested Newts</p>	No

Site Code SHL021	Address Woodnesborough Nurseries, Sandwich Road, Woodnesborough	Parish Woodnesborough	Overall SHLAA Score 32 (6-10 Years)	Area 2.52Ha
		Hierarchy Village		
Current Use SHLAA Score: 2.0 - Previously not developed land inside settlement boundaries (designated open space but not environmental designation)				
<p>Description of Site</p> <p>Irregular shaped, flat, site consisting of one property within open land formally used as a nursery but now has the appearance of garden/grass field. The site has mature trees running along the northern, eastern and southern boundaries and a hedge along the western boundary. There is a manor house (Woodnesborough House) located to the west and this would appear to use one of two current access to the site. The second access consists of a gate located at the northern most point of the site (this has been identified as the access to the site). There are residential properties to the north and agricultural fields to the east and south.</p> <p>The agricultural field to the east has also been put forward for possible future development (please see LDF02).</p>				
Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation				
The northern boundary is adjacent to the settlement confines.				
Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints				
<p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development.</p>				
<p>Historic Environment</p> <p>There is a Scheduled Monument (the moat at Grove Manor) and two Listed Buildings (1-4 Oast Cottages & 1-2 Manor Barns) adjacent to the site on the southern boundary. Honeypot Cottage, on the northern boundary is also a Listed Building. Although the site has a line of trees along the south eastern boundary, development up to the boundary of the site would intensify the urban form (including street lighting and new roofscape) on the edge of a rural village. Development of the whole site would, therefore, have a detrimental impact on the setting of the adjacent Listed Buildings and Scheduled Monument (SM) through the coalescence of Grove Manor farm with Woodnesborough village.</p> <p>Development of part of the site, away from the Listed Buildings, may be acceptable.</p>				
<p>Landscape Impact</p> <p>The site appears to be maintained as an extensive grassed garden area with one property on it (Google Earth, 2008, accessed 2011). It is extremely discrete in respect of views, having extensive boundary tree and hedge cover. If the tree belt was maintained, the impact of development on the wider landscape might be acceptable, although proximity to Grove Manor SM would have to be taken into account. If the tree cover were removed or thinned to any extent, then there would be a detrimental effect on the wider landscape.</p>				
<p>Biodiversity</p> <p>A Great Crested Newt Habitat Suitability Index would be essential due to the proximity of water bodies (two less than 20m to boundary). It is probable that bats would use the tree lines for foraging and flight lines. Due to the management of the grassland, common reptiles are unlikely to occur.</p>				

EIA Screening: necessary due to size	Appropriate Assessment: a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary. The housing number would also suggest that site specific assessment may be necessary in respect of impacts on Sandwich Bay.
<p>Green Infrastructure</p> <p>PRoW EE220 runs along the northern boundary of the site. The site boundaries are important for landscape and biodiversity and the proximity to the SM suggests that the whole site may not be developable, in which case there could be opportunity for increasing GI interest, by use of SUDs swales and recreational GI within the site that links to the PRoW. Unfortunately, there would be no opportunity to bring this site into the wider GI network due to the nature of the surrounding land.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>The only part of the site that has direct access to Sandwich Road (at the northern most corner, which has also been identified by the landowner as the access) is unsuitable due to poor sightlines. The site lines could not be improved as this would require additional third party land (the garden of 1 Rose Cottages and part of the alleyway running behind properties fronting The Street).</p> <p>The alternative access (not suggested) would be around the Manor House and onto Woodland Way. This route consists of a private single width drive that already serves four dwellings. It would not be possible to widen this drive without the use of land from neighbouring properties. This is also not suitable.</p> <p>The site is therefore landlocked.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>There is a bus stop close to the northern boundary of the site, which reflects the scoring in the SHLAA. This bus stop serves the No. 13A route, which runs hourly to Canterbury and Sandwich.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Although the site is well contained, located in the sequentially preferable Flood Zone 1 and close to public transport, the site does not have a suitable access. Development of the site could also have a detrimental effect on the setting of three Listed Buildings and on the setting of a Scheduled Monument.</p>	
Consideration for inclusion in the Submission Document?	No

Site Code LDF02 (WOO01)	Address Land south of Sandwich Road,	Parish Woodnesborough	Overall SHLAA Score 34 (6-10 Years)	Area 3.18 Ha Indicative No. of units @ 30 dph = 37
<p>Current Use SHLAA Score: 1.0 - Fully occupied multiple use (e.g. retail with housing above) or previously not developed land outside settlement boundaries (designated open space) but not environmental designation</p>				
<p>Description of Site</p> <p>Flat, agricultural land located on the eastern side of Woodnesborough where ribbon development has occurred in the past. The site lies to the south of Sandwich Road (the site is slightly raised in relation to this road) opposite existing properties to the north. There are further properties to the east. To the west there is a former nursery, which has also been put forward for development (SHL021). There is a line of mature trees running down the boundary line between these two sites. A mixture of hedgerows and trees run along the southern boundary separating the site from open agricultural land to the south.</p> <p>The Parish Council did consider the site for a new Parish Hall but now prefer SHL048.</p>				
<p>Policy Alignment SHLAA Score: 4.0 – Completely outside development envelope with no other designation or non housing designation</p> <p>The site is adjacent to the settlement confines.</p>				
<p>Physical Constraints SHLAA Score: 8.0 – No obvious physical constraints</p> <p>Flood Risk</p> <p>The site is within Flood Zone 1, which would be appropriate for residential development.</p> <p>Historic Environment</p> <p>There are no Listed Buildings or Conservation Areas within or adjacent to the site. The nearest Listed Building is approximately 70m to the west of the site (Honeypot Cottage in the Old Bakery). There are a number of existing dwellings already located between the site and this historic asset. Development of the site would not, therefore, have a detrimental impact on the setting of this building.</p> <p>Development of the whole site would, however, introduce development that would be against the grain of the existing village and introduce dense urban form on the edge of the village in a rural setting. This would have a detrimental impact on the setting of the village. Frontage development would reflect the current grain of linear development. If the village hall was to be located on this site, it would also be preferable to include this on the frontage but this could reduce number of dwellings and possibly the viability of developing the site.</p> <p>Landscape Impact</p> <p>There would be a detrimental impact on the landscape character and visual setting of this part of Woodnesborough if the whole site were to be developed. If development was restricted to the road frontage then the impact on the wider landscape setting would be limited (the existing development to the north already provides a backdrop) and could be further reduced by buffer planting to the south.</p> <p>Biodiversity</p> <p>The biodiversity value must be low, given the agricultural land use. There is a sliver of land to the south that could be of more interest but given its isolation, this must be limited. However, the site is still close enough to water bodies (less than 200m) that the habitat suitability for Great Crested Newt around the field margins should be checked. If development was to commence, any landscape buffering could enhance biodiversity potential in this area.</p>				

EIA Screening: necessary due to size.	Appropriate Assessment; a contribution to the Thanet Coast SPA Mitigation Strategy would be necessary.
<p>Green Infrastructure</p> <p>The nearest PRow is footpath EE220 that comes close to the western edge of the site. Swales could be incorporated as SUDs and with landscape buffering the site GI could be enhanced, but this would reduce the amount of development on the site.</p>	
<p>Proximity to Road Network SHLAA Score: 5.0 – Less than 5 metres from road assuming direct access to site</p> <p>Limited frontage development could be achieved. A maximum development of up to 50 dwellings could be served from Sandwich Road.</p>	
<p>Access to Services SHLAA Score: 2.5 - Site with at least 1 of 3 from: public transport, GP surgery and school within 5 minutes walk</p> <p>The SHLAA score reflects the fact that there is a bus stop located adjacent to the site. This bus stop serves the No. 13A, which runs hourly to Canterbury and Sandwich.</p>	
<p>Market Attractiveness SHLAA Score: 6.0 – Medium Value, Normal Cost</p>	
<p>Ownership SHLAA Score: 4.5 – Single Private Ownership</p>	
<p>Analysis</p> <p>Development of the whole site would not be suitable as this would intensify the urban form in a rural location. There is, however, potential for frontage development with landscaping behind. This would reduce the impact of the development on the setting of the village and the wider landscape as well as enhancing the biodiversity value.</p>	
<p>Consideration for inclusion in the Submission Document?</p>	<p>Yes</p>



Sustainability
Appraisal (SA)
of the Dover
District Land
Allocations
Local Plan

SA Report

September 2012

UNITED
KINGDOM &
IRELAND



Prepared for:



REVISION SCHEDULE

Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	November 2012	SA Report published for consultation alongside the 'Proposed Submission' version of the plan document	Chris Eves Assistant Consultant	Mark Fessey Senior Consultant	Steve Smith Associate

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Dover District Land Allocations Local Plan. SA is a mechanism for considering the impacts of a draft plan, and alternatives, in terms of sustainability issues, with a view to avoiding and mitigating adverse impacts and maximising the positives. SA of Local Plans is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by The Environmental Assessment of Plans and Programmes Regulations 2004 (which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive of 2001).²

- 2.1.2 The Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report (which we call the 'SA Report') must then be taken into account by the plan-makers, alongside consultation responses, when finalising the plan.

- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, there is a need for the SA Report to answer the following four questions:

1. What's the scope of the SA?

- This is an opportunity to present a review of **sustainability issues** that exist in relation to the plan and identify those that should be a particular focus of the SA (given that issues are potentially numerous, and SA must be focused and concise)

2. What has Plan-making / SA involved up to this point?

- Prior to preparing the draft plan there must be (as a minimum) one plan-making / SA iteration at which point '**alternatives**' are subjected to SA and findings taken into account.

3. What are the SA findings at this current stage?

- i.e. what are predicted to be the sustainability effects of **the draft plan** and what changes might be made to the plan in order to avoid or mitigate negative effects and enhance the positives.

4. What happens next?

- In particular, there is a need to think about how the effects of the plan will be **monitored** once it is adopted and being implemented.

- 2.1.4 These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within SA Reports. **Table 1.1** makes the links between the Schedule 2 requirements and the four SA questions. **Appendix I** of this SA Report explains the process of 'making the links' in more detail, including an explanation of how the Schedule 2 requirements have been interpreted on the basis of recent legal judgements.

3 STRUCTURE OF THIS SA REPORT

- 3.1.1 The four SA questions are answered in turn across the four subsequent parts of this Report.

¹ The Town and Country Planning (Local Planning) (England) Regulations 2012 state that an SA Report must be published for consultation alongside the 'Pre-submission' Local Plan.

² Directive 2001/42/EC

³ Regulation 12(2)

Table 1.1: Questions that must be answered (sequentially) within the SA Report

SA QUESTION	SA SUB-QUESTION	CORRESPONDING REQUIREMENT OF THE ENV ASSESSMENT REGS (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The environmental protection objectives, established at international, Community or Member State level, relevant to the plan
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
	How would the baseline evolve without the plan?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan
	What are the key issues that should be the focus of SA?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
What has Plan-making / SA involved up to this point?		<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with The likely significant effects on the environment associated with alternatives An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
What are the SA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
What happens next?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

PART 1: WHAT'S THE SCOPE OF THE APPRAISAL?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the scope of the SA. In particular, and as required by the Env Assessment Regs, this Chapter answers the series of questions below.

Table 4.1: Scoping steps undertaken to meet the requirements of the Env Assessment Regs

SA QUESTION ANSWERED	CORRESPONDING REQUIREMENT OF THE SEA DIRECTIVE MET (THE REPORT MUST INCLUDE...)
What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan'
What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes' The environmental protection objectives, established at international, Community or Member State level, relevant to the plan
What's the sustainability 'baseline'?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
How would the baseline evolve without implementation of the plan?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan'
What are the key sustainability issues that should be a particular focus of the appraisal?	<ul style="list-style-type: none"> Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

4.2 Consultation on the scope

4.2.1 The Env Assessment Regs require that: *When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies.* In England, the consultation bodies are Natural England, The Environment Agency and English Heritage.⁴ As such, these authorities were consulted on the scope of SA for the Dover District Local Plan⁵ in 2005 and 2007. The document was amended to reflect consultation responses and is now available on the Council's website.

⁴ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because 'by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.'

⁵ At the time, the scoping process was introduced as being focused on the Dover District Local Development Framework...

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The report must include...

- An outline of the contents, main objectives of the plan

5.1 Introduction

5.1.1 At the outset of scoping there is firstly a need to understand the broad scope of the plan, i.e. broadly the types of issue that will be addressed. The broad scope of the plan is reflected in a list of established plan objectives.

5.2 Aims of the plan

5.2.1 The main aim of the Dover District Land Allocations Local Plan is to identify and allocate specific sites that are suitable for development in order to meet the Core Strategy's requirements and make a major contribution to delivering the Strategy. It covers the same plan period as the Core Strategy. In setting out what type of development is being promoted where, the Plan will provide local communities, landowners, developers and infrastructure providers a large degree of certainty about the future pattern of development in the district.

5.3 What's the plan not trying to achieve?

5.3.1 It is important to emphasise that the plan will be strategic in nature. The plan will go as far as to allocate sites, but even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

6 WHAT’S THE SUSTAINABILITY ‘CONTEXT’?

The report must describe...

- The relationship of the plan with other relevant plans and programmes
- The environmental protection objectives, established at international, Community or Member State level, relevant to the plan’

6.1 Introduction

6.1.1 An important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing ‘sustainability context’ messages (e.g. relating to objectives or issues) set out within relevant published plans, policies, strategies and initiatives (PPSIs).

6.2 Key messages identified through scoping

6.2.1 Table 6.1 presents a summary of the key context messages established at the scoping stage.

Table 6.1: Key messages from the context review

Respect environmental limits
Conserve and enhance biodiversity . In particular, seek to protect all statutory nature conservation sites as well as focussing on biodiversity in the wider environment, connectivity and the provision of new habitats.
Create mixed communities
Reduce car dependence by facilitating more walking and cycling and improving public transport linkages
Promote good design in new developments
‘Green’ residential developments and ensure sufficient open space provision
Avoid developments at a density of less than 30 dwellings per hectare net
Incorporate waste strategies into new developments; encourage re-use, recycling and recovery of waste
Locate major traffic generators in cities, towns and district centres
Ensure that jobs, shopping, leisure facilities and services are accessible by public transport
Protect the historic environment and secure increased access where appropriate
Protect open space and sports and recreational facilities of high quality / value to the local community
Protect stretches of Heritage Coast and prohibit unnecessary coastal development
Separate noise generating from noise sensitive land uses
Promote more sustainable drainage systems where appropriate
Ensure that local communities have access to a range of shopping, leisure and local services
Regenerate deprived areas
Prioritise the development of previously developed (brownfield) sites
Re-use existing buildings
Conserve the natural beauty of the Area of Outstanding Natural Beauty (AONB)
Support development proposals that will aid farming

Develop renewable energy sources and incorporate renewable energy projects in new developments; contribute to Kent-wide targets for renewable energy
Support a more local, small scale and dispersed pattern of energy generation
High standards of energy efficiency in new developments and support combined heat and power (CHP)
Where appropriate, invoke the 'precautionary principle' in relation to potentially polluting development
Encourage high value added activities and promote cluster activities (e.g. pharmaceutical research)
Improve road access (particularly A2 and A20)
Enhance the role of Dover port and restore the port's rail connection
Upgrade tourism facilities, promote diversity and reduce seasonality
To improve the match between housing needs and provision
Reduce the number of rough sleepers in Dover District
Reduce the number of unfit dwellings
Secure adequate domestic access to the Channel Tunnel Rail Link (CTRL)
Regenerate the coalfields and promote a mixed use community at Aylesham
30% of new housing is ' affordable '
Endeavour to reduce greenhouse gas emissions and adapt to climate change already underway
Promote market towns as hubs for local business development
Incorporate disabled access into development
Protect coastal ecosystems from defence works
Include policies to promote better public health (e.g. through walking and cycling initiatives)
Encourage developments that 'design out' crime and reduce fear of crime
Consider the impact of growth in Ashford
Consider the implications of an ageing population

6.3 Key messages from the NPPF⁶

6.3.1 In March 2012 the National Planning Policy Framework (NPPF) was published. The NPPF, read as a whole, constitutes 'the Government's view of what sustainable development in England means in practice for the planning system'. The following is a summary of the new guidance included in the NPPF that is of relevance to this assessment.

Biodiversity and open space

6.3.2 Impacts on biodiversity should be minimised, with net gains in biodiversity to be provided wherever possible. To contribute to national and local targets on biodiversity, planning should promote the 'preservation, restoration and re-creation of priority habitats, ecological networks' and the 'protection and recovery of priority species'. High quality open spaces should be protected or their loss mitigated, unless a lack of need is established.

⁶ CLG (2012) National Planning Policy Framework [online] available at: <http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf> (accessed 08/2012)

Landscape

- 6.3.3 The planning system should protect and enhance valued landscapes. In designated areas, planning permission should be refused for major development, unless it can be demonstrated to be 'in the public interest'. 'Great weight' should be given to the conservation of the landscape and scenic beauty of Areas of Outstanding Natural Beauty, which have the 'highest level of protection' in this regard.
- 6.3.4 Planning policies and decisions should 'encourage effective use of land' through the reuse of land which is previously developed, 'provided that this is not of high environmental value'. The value of best and most versatile agricultural land should also be taken into account.
- 6.3.5 In relation to the undeveloped coast, local planning authorities should maintain the character of such areas by 'protecting and enhancing its distinctive landscapes', particularly in those areas that have been defined as Heritage Coast.

Cultural heritage

- 6.3.6 Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

Air quality

- 6.3.7 New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account the presence of Air Quality Management Areas and cumulative impacts on air quality.

Soil and contamination

- 6.3.8 The planning system prevent new or existing development from being 'adversely affected' by the presence of 'unacceptable levels' of soil pollution or land instability and be willing to remediate and mitigate 'despoiled, degraded, derelict, contaminated and unstable land' wherever appropriate.

Climate change mitigation

- 6.3.9 Supporting the 'transition to a low carbon future in a changing climate' is regarded as a 'core planning principle'. A key role for planning in securing reduced GHG emissions is envisioned, with specific reference made to meeting the targets set out in the Climate Change Act 2008⁷. Specifically, planning policy should support the move to a low carbon future through:
- planning for new development in locations and ways which reduce GHG emissions;
 - positively promoting renewable energy technologies and considering identifying suitable areas for their construction; and

Climate change adaptation

- 6.3.10 Planning authorities should take account of the long term effects of climate and 'adopt proactive strategies' to adaptation, with new developments planned to avoid increased vulnerability to climate change impacts.

⁷ The Climate Change Act 2008 sets targets for greenhouse gas (GHG) emission reductions through action in the UK of at least 80% by 2050, and reductions in CO2 emissions of at least 26% by 2020, against a 1990 baseline.

- 6.3.11 In terms of flooding, development should be directed away from areas highest at risk and should not be allocated if there are ‘reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. The NPPF states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk posed from coastal change.

Economy & Employment

- 6.3.12 The contribution the planning system can make to building a strong, responsive economy is highlighted. This should include ‘identifying and coordinating development requirements, including the provision of infrastructure’. There is a need to support new and emerging business sectors, including positively planning for ‘clusters or networks of knowledge driven, creative or high technology industries’. In addition, local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas.

Housing

- 6.3.13 Local planning authorities should meet the ‘full, objectively assessed need for market and affordable housing’ in their area. To create ‘sustainable, inclusive and mixed communities’ authorities should ensure affordable housing is provided. Whilst there is no longer a national requirement to build at a minimum density, there is a need to ensure that effective and efficient use of available land is made when permitting residential development.

Education

- 6.3.14 Ensuring that there is a ‘sufficient choice of school places’ is of ‘great importance’. Local planning authorities must ‘work with other authorities and providers’ in order to access the current ‘quality and capacity’ of infrastructure for education, plus its capability of meeting ‘forecast demand’.

Community: Population, Health, Crime and Social Equity

- 6.3.15 The social role of the planning system is defined as ‘supporting vibrant and healthy communities’, with a ‘core planning principle’ being to ‘take account of and support local strategies to improve health, social and cultural wellbeing for all’.

Transport and Accessibility

- 6.3.16 Planning for transport and travel will have an important role in ‘contributing to wider sustainability and health objectives’. To minimise journey lengths for employment, shopping, leisure and other activities, planning policies should aim for ‘a balance of land uses’. Wherever practical, key facilities should be located within walking distance of most properties.

7 WHAT’S THE SUSTAINABILITY ‘BASELINE’?

The report must describe...

- The relevant aspects of the current state of the environment
- The environmental characteristics of areas likely to be significantly affected

7.1 Introduction

7.1.1 Another important step when seeking to establish the appropriate ‘scope’ of an SA involves reviewing the situation now (‘baseline’) for a range of sustainability issues. Doing so helps to enable identification of those key sustainability issues that should be a particular focus of the appraisal, and also helps to provide ‘yardsticks’ for the appraisal of significant effects.

7.1.2 The SA Scoping Report sets out a clear picture of baseline conditions in Dover District for a range of sustainability issues. This Chapter presents an updated summary.

7.2 The environmental baseline

7.2.1 Figures 7.1 – 7.2 depict some of the key environmental constraints within the district.

Figure 7.1: Areas of nature conservation importance in and around Dover District

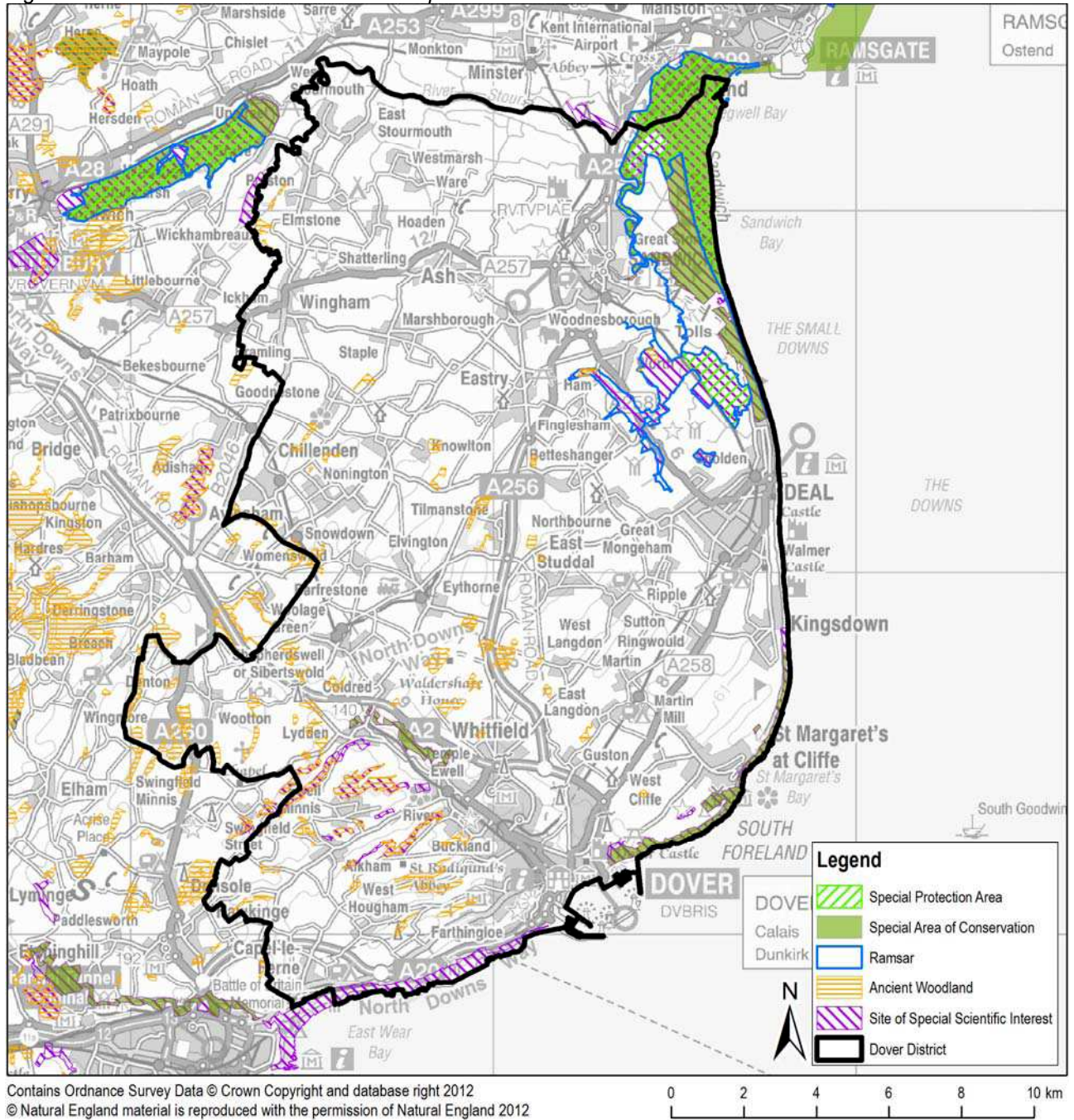
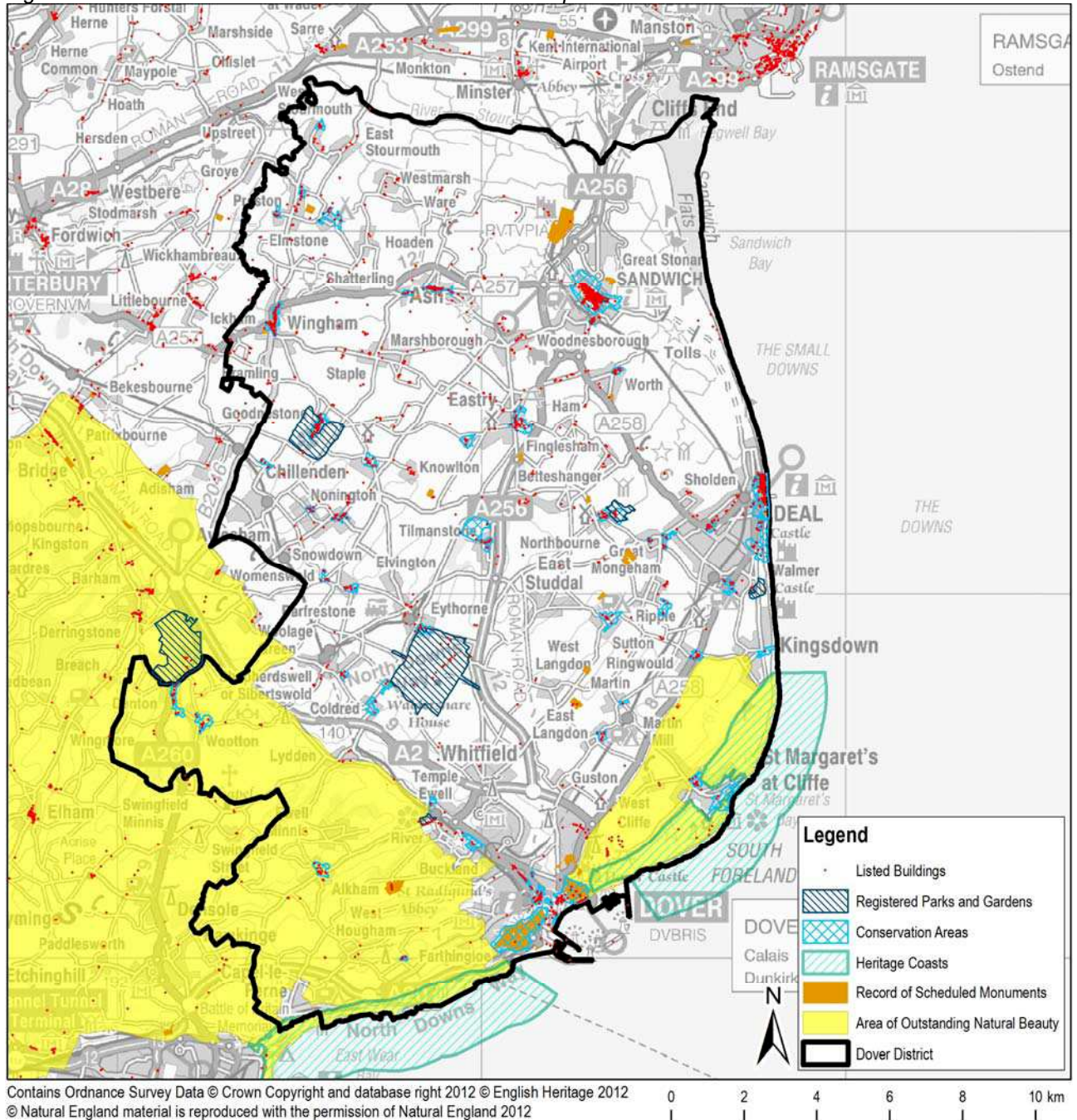


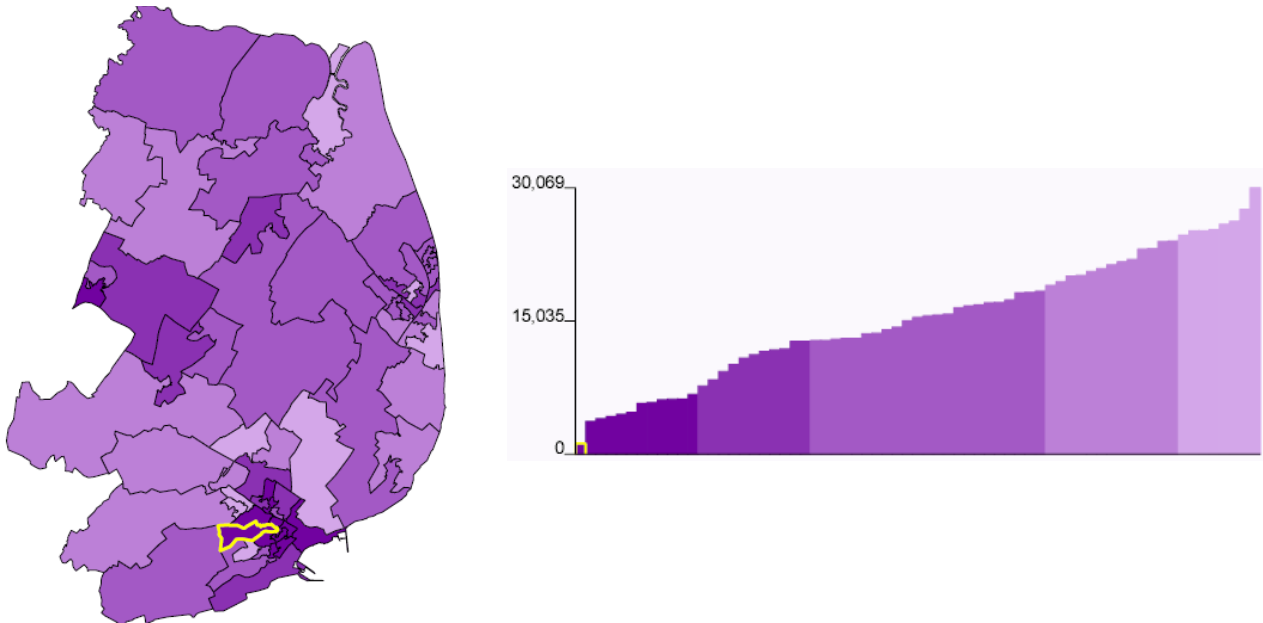
Figure 7.2: Areas and features of historic environment importance in and around Dover District



7.3 Deprivation

7.3.1 The Index of Multiple Deprivation (2010) dataset identifies relative deprivation for ‘Super Output Areas’, which are geographical areas of a similar size to electoral wards. Figure 7.3 shows the spatial pattern of relative deprivation across Dover District.

Table 7.3: Relative deprivation across Dover District (with the most deprived SOA highlighted)



- 7.3.2 An examination of the data reveals that:
- Dover District is ranked 127th in the IMD out of 326 districts nationally, placing it within the bottom 20-40% of all districts by this measure.
 - Deprivation is concentrated around the urban areas of Deal and Dover, with the latter particularly affected. Of the 20% worst performing Super Output Area (SOA) in the district all but one area is found in or around the town of Dover.
 - The most deprived SOA in the district is located near to Buckland on the northwest outskirts of the town of Dover. It is ranked 1,228th out of a total of 32,482 SOAs nationally.
 - There are noticeable pockets of deprivation outside of the urban areas, particularly concentrated in the rural west of the district. An SOA in the vicinity of Aylesham on the western outskirts of the district is amongst the district’s 20% most deprived.
 - A high number of the least deprived areas in the district are found on the outskirts of the main urban areas. The least deprived SOA in the district is found in the River area to the north west of Buckland, ranked 30,069th nationally.

7.4 Summary of the baseline

7.4.1 Table 7.1 considers a range of ‘sustainability baseline’ indicators in terms of which Dover District was, in 2007, identified as performing poorly, or underperforming. The implication is that the Local Plan should seek to have a positive effect on performance against these indicators, and hence the indicators provide useful ‘yardsticks’ for SA. It is important to note that this table has not been updated to reflect the most up-to-date situation.

Table 7.1: Indicators considered a priority for action and needing action⁸

Poor performance (priority for action)
Homelessness
Temporary accommodation / rough sleepers
Properties at risk from flooding
House price to income ratio
Average life expectancy
Index of multiple deprivation
Number of households with no central heating
Number of days of air pollution
Number of days per year when air pollution is moderate or high for PM10
Average daily motor vehicle flows
Proportion of total area that is derelict land and buildings
Recycling of household waste
Change in total employment over time
Proportion of people of working age in employment
Businesses per 1000 population
Change in total VAT registered business stock
Proportion of businesses in knowledge-driven sectors
Proportion of professional occupations among employed workforce
Under-performing
Percentage of people describing their health as good
Long-term illness, health problems or limiting disabilities
Public concern over noise
Population of wild birds
Area of woodland
Household waste arisings
Rivers of Good or Fair chemical and biological water quality
Per capita consumption (PCC) of water
Unemployment rate
Average gross weekly earnings
New business formation rate
Proportion of people qualified to degree level or higher
Proportion of adults with poor literacy and numeracy skills

⁸ The Scoping Report contains further information on the source of this data. It is important to note that some trends (i.e. problems) have been identified at the scale of Kent, and have been included here on the basis of an assumption that they apply to Dover District.

8 HOW WOULD THE BASELINE EVOLVE WITHOUT THE PLAN?

The report must describe...

- The likely evolution of the current state of the environment without implementation of the plan

8.1.1 Just as it is important for the scope of SA to be informed by an understanding of current baseline conditions, it is also important to ensure that thought is given to how baseline conditions might ‘evolve’ in the future under the ‘no plan’ / ‘business as usual’ scenario. The following bullets consider a range of ‘future baseline’ issues:

- Without provision of new homes and employment sites through the Land Allocations Local Plan the district would see an ageing population, and a resultant decrease in the working age population.
- Without the Plan applications for new development would still come forward, but there would be less certainty that these would be sustainable and viable, and this could lead to uncertainty and delayed provision of important infrastructure.
- Reduced rates of development could mean that many environmental impacts of development are avoided, for instance land take and impacts on biodiversity. On the other hand, without the Local Plan new development is unlikely to take place on the best sites from an environmental perspective. In the future, biodiversity and ‘ecosystem services’ are likely to reduce and therefore become more important. In order to strengthen the proposals for green infrastructure network in the AONB, especially in the chalk grassland around Dover, Interreg funding has been secured, through the Heritage Lottery Fund, to develop a Landscape Conservation Action Plan. The focus of the Action Plan is to understand the landscape characteristics and heritage assets and create a positive action plan that can be taken forward to improve the landscape.
- Without the plan, development may not take place on the most accessible sites, so traffic and associated pollution could become more of a problem locally. An ageing population will require a wider range of services within easily accessible distance and transport mode of their homes. The railway line to Dover now operates a high speed service with peak day HS1 services to Deal and Sandwich, and a Bus Rapid Transit (BRT) system is planned for between Whitfield and Dover.
- Climate change is likely to increase the risk of flooding and coastal erosion locally. The Environment Agency is developing flood defences at Sandwich and Deal, designed to protect the existing settlement: these will also have benefits for future homes.

9 WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE APPRAISAL?

The report must include...

- Any existing environmental problems which are relevant to the plan

9.1 Introduction

9.1.1 Drawing on the review of the sustainability context and baseline, the SA Scoping Report identified a range of key sustainability issues and objectives.

9.2 Sustainability issues (objectives)

9.2.1 Subsequent to the review of the sustainability context and baseline a number of key issues could be identified that should be a particular focus of SA. Key issues were then ‘refined’ into a list of 14 SA ‘objectives’ – see Table 9.1. It is these SA objectives that have been used as a methodological framework around which to structure the appraisal.

Table 9.1: SA objectives identified through scoping

AN OBJECTIVE IS...	
1.	To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home
2.	To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment
3.	To improve the health and well-being of the population and reduce inequalities in health
4.	To reduce poverty and social exclusion; close the gap between the most deprived areas and the rest
5.	To improve accessibility for everyone to all services, facilities, recreational opportunities and employment
6.	To reduce air pollution (including greenhouse gas emissions); ensure air quality continues to improve
7.	To conserve and enhance biodiversity
8.	To protect, enhance and make accessible for enjoyment, the countryside and the historic environment
9.	To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure
10.	To create a high quality built environment
11.	To promote sustainable forms of development and sustainable use of natural resources
12.	To encourage high and stable levels of employment and sustain economic competitiveness
13.	To improve the development and retention of skills
14.	To ensure that development benefits everyone in the District

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

10 INTRODUCTION (TO PART 2)

The report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives
- An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.

10.1.1 What this means in practice is that, although only one report must be prepared – an SA Report for publication alongside the pre-submission plan (i.e. this report) – there must be at least one earlier plan-making / SA iteration at which point alternatives are appraised and findings subsequently taken onboard by plan-makers. The SA Report must then ‘tell the story’.

10.1.2 As such, in relation to site allocations, this Chapter:

- Explains how the Council came to a short-list of site options (to subject to SA); and
- Explains why preferred site options were chosen from the short-list.
 - As part of this, the influence of SA is explained. To further illuminate this explanation **Appendix II** of this Report presents SA findings in full.

11 IDENTIFYING A SHORT-LIST OF SITE OPTIONS

11.1.1 Firstly, a long list of site options was drawn-up on the basis of sites put forward by promoters and those sites identified through a Strategic Housing Land Availability Assessment (SHLAA) study.

11.1.2 Subsequent to the establishment of a long-list, some site options were ‘screened-out’ by the council on the basis that they were ‘unreasonable’. For example:

- Housing sites within hamlets were screened-out as unreasonable on the basis that Core Strategy policy precludes development in these locations; and
- Some sites in the functional floodplain (in particular within Dover Town) were screened out.

11.1.3 Subsequently, a short-list of 321 residential/mixed use sites, 8 employment sites and 1 retail site⁹ was established. It is these sites that are deemed to be ‘reasonable options’ and have been the subject of SA with a view to selecting a final list of preferred options.

12 SELECTING PREFERRED SITE OPTIONS

12.1.1 From the shortlist of site options, the Council has come to a decision on a list of preferred site options (i.e. sites the Council intends to allocate) on the basis of evidence from a range of sources. Considerable weight has been given to evidence gathered through consultation (including direct consultation with all relevant Parish and Town Councils) and site visits.

⁹ This retail site option was established subsequent to a Retail Update study, which established the need for convenience goods floorspace in Sandwich. On the basis of this evidence, one site option was identified.

- 12.1.2 Specifically, through site visits by Council officers,¹⁰ it was possible to establish for each site:¹¹
- The site's current use and the nature of surrounding uses;
 - Whether the site is consistent with Core Strategy policies, notably whether it is in the development envelope;
 - Physical constraints to the site (flood risk, historic environment, landscape, biodiversity, green infrastructure);
 - Ownership of the site;
 - A view on accessibility to the road network and to services;
 - A view on the site's market attractiveness; and
 - A view on overall strengths and weaknesses.

12.1.3 Site proformas, containing a full analysis of all sites, are available on the District Council's website.

12.2 Reflecting the findings of Sustainability Appraisal

12.2.1 Considerable weight has also been given to the findings of SA. Complete appraisal findings in relation to the site options are presented within **Appendix II** of this Report.

12.2.2 For a number of sites the SA suggests that significant constraints exist (i.e. at least one 'red' score is assigned – see Appendix II). In some instances, however, the planning team – on the basis of evidence other than the SA - has chosen to allocate these sites nonetheless. Table 12.1 focuses on these sites and provides the Council's response to SA findings / justification for allocating the site.

12.2.1 Conversely, a number of the sites that the SA has found to perform well (i.e. for which no red scores are assigned – see Appendix II) have not been allocated. Table 12.2 focuses on these sites and provides the Council's response to SA findings / justification for not allocating the site.

¹⁰ Site visits were undertaken by planning officers supported by officers from the Council's Conservation, Heritage, Landscape, and Nature Conservation sections, and Kent County Council Highways officers

¹¹ A 'proforma' was developed prior to site visits to ensure consistent data-gathering.

Table 12.1: Preferred sites 'flagged' as constrained by the SA; and the Council's comments in response

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
CAP03	Land north of junction with Capel Street and Winehouse Lane	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to the AONB - Distance to a train station 	<ul style="list-style-type: none"> - Capel Primary School is located to the south of the site, accessed from Capel Street, and would only be a five minute walk. It is recognised that proximity to the AONB is a constraint. In light of this, the preferred site boundary is drawn tighter to the west of the site to reduce the impact of development on the setting of the AONB. A site specific policy is included in the Pre-Submission plan. (see Policy LA19)
DEA29	Stalco, Deal	Residential	<ul style="list-style-type: none"> - Flood zone - Distance to SAC, SPA or Ramsar 	<ul style="list-style-type: none"> - It is recognised that flooding is an issue. Half of the site is located within Flood Zone 2. The site is outside of the Maximum Breach area as modelled in the SFRA. Alternative sites located within Flood Zone 1 have been considered in the first instance, however the capacity of these sites do not meet the housing requirement for Deal over the plan period. - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
DEA30	Stalco, Deal	Residential	<ul style="list-style-type: none"> - Flood zone - Distance to SAC, SPA or Ramsar 	<ul style="list-style-type: none"> - As above.

¹² Whilst the majority of 'constraints' listed (within Table 12.1) correlate directly to 'red scores' highlighted within Table C of Appendix II, some additional constraints are also highlighted. These were identified following a closer review (undertaken by URS) of the 'site appraisal proformas' completed by Dover District Council subsequent to site visits. These additional constraints are marked with an (*).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
EAS02/SHL059	Eastry Court	Residential	<ul style="list-style-type: none"> - Distance to SAC, SPA or Ramsar - Distance to a listed building - Distance to a Conservation Area - Distance to a train station - Agricultural land classification 	<ul style="list-style-type: none"> - It is recognised that the site is in a sensitive location, and there is an opportunity for limited development on part of the site. A site specific policy setting out design criterion for the site has been established (see Policy LA21). - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
EAS05	Land to the west of Gore Lane	Residential	<ul style="list-style-type: none"> - Distance to a train station - Agricultural Land Classification - Pedestrian access* 	<ul style="list-style-type: none"> - A site specific policy is included to ensure that any development proposals provide a footpath along Gore Lane (see Policy LA20). - In relation to proximity to facilities, it should be noted that Eastry has a number of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. A regular bus service provides connections to Canterbury and Sandwich both of which have train stations.
LA1 (Phase II)	White Cliffs Business Park, Dover	Employment	<ul style="list-style-type: none"> - Distance to a train station - Agricultural land classification 	<ul style="list-style-type: none"> - The site performs very well in the Employment Update (2012 – see SALD), particularly in place-making, balanced community and economy. There is also excellent transport access, and established employment uses surrounding the site. Given its ranking in the SALD the site warrants policy protection to ensure employment uses are retained. Furthermore, in terms of public transport provision the Bus Rapid Transit route will connect the site to Dover town/railway station.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
LA1 (Phase III)	White Cliffs Business Park, Dover	Employment	<ul style="list-style-type: none"> - Distance to a train station - Agricultural land classification 	<ul style="list-style-type: none"> - The site performs very well in the Employment Update (2012 – see SALD), particularly in place-making, balanced community and economy. There is also excellent transport access, and established employment uses surrounding the site. Given its ranking in the SALD the site warrants policy protection to ensure employment uses are retained. Furthermore, in terms of public transport provision the Bus Rapid Transit route will connect the site to Dover town/railway station.
LDF01	Land at Homeside, Eythorne	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a train station 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Eythorne is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community
LDF015	Land to south of New Dover Road, Capel	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a SSSI - Distance to a train station 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Capel has a number of local facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service providing connections to Folkestone and Dover both of which have train stations and secondary schools. A site specific policy is included to ensure that any development proposals enhance and maintain the chalk grassland located immediately south of the site (see Policy LA18).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
LDF017	Land between Village Hall and the Bothy, Kingsdown	Residential	<ul style="list-style-type: none"> - Distance to SAC, SPA or Ramsar - Distance to a SSSI - Distance to a Conservation Area - Distance to a train station 	<ul style="list-style-type: none"> - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA). - Given the site's location within a Conservation Area there will need to be careful consideration given to design as part of any planning application. A site specific policy is included to ensure that any development proposals retain the existing wall fronting Upper Street and the protected trees. Development should be restricted to the lower portion of the site (see Policy LA25).
LDF018	Land at Mill Lane, Shepherdswell	Residential	<ul style="list-style-type: none"> - Distance to a secondary school 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Shepherdswell has a number of local facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service and the nearby train station provides connections to Canterbury and Dover both of which have secondary schools.
LDF03	Laslett's Yard, Woodnesborough	Residential	<ul style="list-style-type: none"> - Children's play facility - Distance to a primary school - Distance to a train station 	<ul style="list-style-type: none"> - The site is located on bus route to Ash and Sandwich both of which have Primary Schools and the latter a train station.
LDF030	Buckland Mill	Residential	<ul style="list-style-type: none"> - Flood zone 	<ul style="list-style-type: none"> - It is recognised that flooding is an issue. Part of the site is covered by full planning permission (currently under construction), which provides flood storage. A site specific policy is included to ensure that the design of buildings include flood mitigation measures (see Policy LA8).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
LDF036	Land at Barwick Road	Residential	- Distance to the AONB	- The site is located within the AONB and comprises vacant industrial buildings. Development of the site offers an opportunity to improve the impact on the AONB. A Local Nature Reserve is located to the south of the site, beyond the existing built form; development of the site would not impact on this designation. The site has the benefit of outline planning permission, and the allocation in the plan reflects this.
LDF04	Land between Cherry Garden Lane and 79 Sandwich Road, Ash	Residential	- Distance to a primary school - Distance to a listed building - Distance to a train station	- In relation to proximity to facilities, it should be noted that Ash has a wide range of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service which runs through the centre of the village, where there is a Primary School, and to Canterbury and Sandwich both of which have train stations. (see Policy LA17)
LDF041	East Studdal Nursery	Residential	- Distance to a primary school - Distance to a train station	- In relation to proximity to facilities, it should be noted that East Studdal is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community.
LDF06	Charlton Sorting Office	Residential	- Flood zone	- A detailed Flood Risk Assessment will need to be undertaken and this must include a detailed hydraulic model to accurately assess flood risk. A site specific policy is included within the Pre-Submission plan (see Policy LA2).
LDF08	Factory building Lorne Road	Residential	- Flood zone - Distance to a listed building	- The site is a derelict factory in an established residential area, and presents an opportunity to improve the urban landscape. The site is located in Flood Zone 3, however the EA has advised that mitigation will be possible subject to stringent conditions.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
MON01C	Northbourne Road, Great Mongeham	Residential	<ul style="list-style-type: none"> - Distance to Children's play facility - Distance to a primary school - Distance to SAC, SPA or Ramsar - Distance to a train station - Agricultural land classification 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Great Mongeham is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. In relation to proximity to facilities, it should be noted that the site is close to bus route that serves Deal town centre/train station. Hornbeam Primary School is approximately 1.5km from the site. - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
MON02C	Great Mongeham Farm	Residential	<ul style="list-style-type: none"> - Distance to Children's play facility - Distance to a primary school - Distance to a SPA, SAC or RAMSAR - Distance to a listed building - Agricultural Land Classification 	<ul style="list-style-type: none"> - In response to these issues, the area of settlement confines has been reduced since Preferred Options document in 2008. The proposed change of confines would enable limited development of the redundant farm buildings. In relation to proximity to facilities, it should be noted that the site is close to bus route that serves Deal town centre, with Hornbeam Primary School approximately 1.3km from the site. - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
MON04C	Mongeham Farm	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a SPA, SAC or RAMSAR - Distance to a listed building - Distance to a Conservation Area - Agricultural Land Classification 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that the site is close to bus route that serves Deal town centre, with Hornbeam Primary School approximately 750m from the site. Sensitive redevelopment, or conversion, of the existing buildings could improve the setting of the neighbouring Listed Building, Conservation Area, and setting of the village. - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
NS01NON	Land at Lynton, Mill Lane, Nonington	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a secondary school - Distance to a Conservation Area - Agricultural Land Classification 	<ul style="list-style-type: none"> - It should be noted that a change of confines has occurred reflecting recent planning permission for one dwelling. - In relation to proximity to facilities, it should be noted that Nonington is categorised as a village. The Primary School is located within the village, and a play area, is approximately a ten minute walk.
NS01SHE	Land at Coxhill, Shepherdswell	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Agricultural Land Classification - Public rights of way* 	<ul style="list-style-type: none"> - The Public Right of Way will need to be incorporated, or diverted, as part of any development proposal. A site specific policy is included within the Pre-Submission plan (see Policy LA23). - In relation to proximity to facilities, it should be noted that Shepherdswell has a number of local facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service and the nearby train station provides connections to Canterbury and Dover both of which have secondary schools.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
NS01StM/NS03StM	Townsend Farm Road, St. Margaret's	Residential	<ul style="list-style-type: none"> - Distance to a SPA, SAC or RAMSAR - Distance to a Conservation Area - Distance to the AONB - Distance to a train station 	<ul style="list-style-type: none"> - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA). - The site is located adjacent to the AONB and the Conservation Area. In order to reduce the impact on the adjacent designations the raised part of the site should remain undeveloped. A site specific policy is included within the pre-submission plan (see Policy LA28). - In relation to proximity to facilities, it should be noted that St. Margaret's is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community.
NS02EAS	Works to rear of Coronation Cottage, Mill Lane	Employment	<ul style="list-style-type: none"> - Distance to a Conservation Area - Distance to a train station - Agricultural Land Classification 	<ul style="list-style-type: none"> - It is expected that development of the light industrial unit with appropriately designed residential would improve the setting of the Conservation Area. However, the plan only envisages redevelopment of the site, for residential purposes, if relevant marketing (required by Core Strategy Policy DM2) has proven unsuccessful.
NS03SUT	Land at Homestead Lane, East Studdal	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a secondary school - Distance to a train station - Agricultural Land Classification 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that East Studdal is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community
NS16DOV	Former TA Centre, London Road	Residential	<ul style="list-style-type: none"> - Distance to a listed building - Distance to a Conservation Area 	<ul style="list-style-type: none"> - Terraced properties to the north west and south east of the site are listed, the latter being located within the Conservation Area. In light of this a site specific policy is included in the Pre-Submission plan (see Policy LA6).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
PHS09	Land between Deal and Sholden	Residential	<ul style="list-style-type: none"> - Flood zone - Distance to SAC, SPA or Ramsar - Distance to a SSSI 	<ul style="list-style-type: none"> - The eastern part of the site is within Flood Zone 2 and 3, and to the north east there are European nature conservation designations. In light of this the site boundary reflects the recent planning application, which was identified through a flood risk sequential analysis of the site. A site specific policy is included in the Pre-Submission plan (see Policy LA10). - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
PHS10	Land North West of Sholden New Road	Residential	<ul style="list-style-type: none"> - Distance to SAC, SPA or Ramsar - Distance to a SSSI 	<ul style="list-style-type: none"> - It is recognised that the need for measures to mitigate any detrimental impacts on the European nature conservation designations to the north of the site should be investigated as part of any development proposal. A site specific policy is included in the Pre-Submission plan (see Policy LA9).
PHS13	Station Road, Walmer	Residential	<ul style="list-style-type: none"> - Distance to a primary school 	<ul style="list-style-type: none"> - The Downs CoE Primary School, to the north, is approximately a ten minute walk.
PHS17&18	West of St Bart's Rd Sandwich	Residential	<ul style="list-style-type: none"> - Distance to SAC, SPA or Ramsar 	<ul style="list-style-type: none"> - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
SAD24	Former Council Yard, Molland Drive	Residential	<ul style="list-style-type: none"> - Distance to a train station 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Ash has a wide range of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. A regular bus service provides connections to Canterbury and Sandwich both of which have train stations.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
SAD28	Garage Yard, Kingsdown	Residential	<ul style="list-style-type: none"> Distance to a train station 	<ul style="list-style-type: none"> In relation to proximity to facilities, it should be noted that Kingsdown is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. A regular bus service provides connections to Deal where there is a train station.
SAN04	Archer's Low Farm, St. George's Road, Sandwich	Residential	<ul style="list-style-type: none"> Distance to a primary school Distance to SAC, SPA or Ramsar Distance to a SSSI 	<ul style="list-style-type: none"> In relation to proximity to facilities, it should be noted that Sandwich has been identified as a Rural Service Centre, the main focus for development in the rural area. A site specific policy is included, with a requirement for a landscape buffer (see Policy LA14). This will help towards (but not meet all) mitigation for impacts on the European designated sites.
SAN13	Land adj to Sandwich Technology School	Residential	<ul style="list-style-type: none"> Distance to SAC, SPA or Ramsar 	<ul style="list-style-type: none"> The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA).
SHE04V	Land at 4 Mill Lane, Shepherdsweil	Residential	<ul style="list-style-type: none"> Distance to a secondary school Distance to a Conservation Area 	<ul style="list-style-type: none"> Given the site's location within a Conservation Area there will need to be careful consideration given to design as part of any planning application. In relation to proximity to facilities, it should be noted that Shepherdsweil has a number of local facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service and the nearby train station provides connections to Canterbury and Dover both of which have secondary schools

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
SHL011	Site at Millfield, Ash	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a train station 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Ash has a wide range of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service which runs through the centre of the village, where there is a Primary School, and to Canterbury and Sandwich both of which have train stations.
SHL012	Land at Sandwich Road, Ash	Confines (residential)	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a train station 	<ul style="list-style-type: none"> - The recommendation is for the site to be included within the settlement confines, to reflect the existing residential development. No further development of the site is envisaged. - In relation to proximity to facilities, it should be noted that Ash has a wide range of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. The site is on a regular bus service which runs through the centre of the village, where there is a Primary School, and to Canterbury and Sandwich both of which have train stations.
SHL015	Prima Windows, Nonington	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a secondary school - Distance to a listed building - Distance to a Conservation Area - Distance to a train station - Agricultural Land Classification 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Nonington is categorised as a village. The Primary School is located within the village, together with a play area. It is acknowledged that these would be approximately a ten minute walk. It is considered that development of this site could enhance the setting of the Listed Buildings and Conservation Area with the removal of industrial buildings. A site specific policy is included to ensure that any proposed development reflects the density of the surrounding development (see Policy LA27).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
SHL025	Old Chalk Pit, Heronden Road	Residential	- Distance to a train station	- In relation to proximity to facilities, it should be noted that Eastry has a number of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. A regular bus service provides connections to Canterbury and Sandwich both of which have train stations.
SHL026	Land at Chequer Lane, Ash	Residential	- Distance to a train station	- In relation to proximity to facilities, it should be noted that Ash has a wide range of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. A regular bus service provides connections to Canterbury and Sandwich both of which have train stations.
SHL031	Land at Adelaide Road, Eythorne	Residential	- Distance to a secondary school - Distance to a train station - Agricultural Land Classification	- In relation to proximity to facilities, it should be noted that Eythorne is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community
SHL035	Land north of Langdon Primary School	Residential	- Agricultural Land Classification	- East Langdon is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. Although good quality agricultural land, this site offers the only suitable location for development in the village over the plan period.
SHL037	Albany Place, Dover	Residential	- Distance to a Scheduled Monument	- A Scheduled Monument lies to the north, adjacent to the site. An archaeological assessment would need to be carried out as part of any planning application. A site specific policy is included within the Pre-Submission plan (see Policy LA3).

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
SHL042	Land at Canterbury Road, Lydden	Residential	<ul style="list-style-type: none"> - Distance to Children's play facility - Distance to SAC, SPA or Ramsar - Distance to a SSSI - Proximity to the AONB - Distance to a train station 	<ul style="list-style-type: none"> - It is recognised that proximity to the SSSI/SAC is an issue. The site offers opportunities for biodiversity enhancement. Connectivity to the north should be discouraged due to proximity of the SAC. A specific site policy is included within the Pre-Submission plan (see Policy LA26) - The site is enclosed with built form to the north and south. Therefore, any impact on the setting of the AONB would be minimal. - In relation to proximity to facilities, it should be noted that Lydden is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. A regular bus service provides connections to Dover, and the railway station, and the Primary School has a play area.
SHL048	Land between Stoneleigh and Nine Acres, Woodnesborough	Residential	<ul style="list-style-type: none"> - Distance to Children's play facility - Distance to a primary school - Distance to a listed building - Distance to a train station 	<ul style="list-style-type: none"> - The site is located on bus route to Ash and Sandwich both of which have primary schools and the latter a train station. A site specific policy is included to ensure that any proposed development reflects the density of the surrounding development (see Policy LA29).
SHL050	Manor View Nursery, Temple Ewell	Residential	<ul style="list-style-type: none"> - Flood zone - Distance to SAC, SPA or Ramsar - Distance to a SSSI - Distance to the AONB - Noise and vibration* 	<ul style="list-style-type: none"> - The proximity to sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs) has been the focus of a separate process of Habitats Regulations Assessment (HRA). - The site lies adjacent to the AONB. To reduce the impact on its setting a landscape buffer would be required. A specific site policy is included within the Pre-Submission plan (see Policy LA4). - Due to the adjacent railway viaduct, noise and vibration issues will need to be examined as part of any development proposal.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
SHL060	Land between 107 and 127 Chapel Street, Chapel-He-Ferne	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to the AONB - Distance to a train station 	<ul style="list-style-type: none"> - The site lies immediately adjacent to the AONB. A lower number of dwellings per hectare is recommended as the site is adjacent to the AONB in order to reduce any impact on the setting of the AONB.
SHL062	Land adjacent to the Former Melbourne County Primary School	Residential	<ul style="list-style-type: none"> - Distance to a train station - Proximity to a local wildlife site* 	<ul style="list-style-type: none"> - The site abuts a Local Wildlife Site. The site is considered suitable for development, whereby the adjacent LWS is brought back into management in exchange for the loss of this site to development. In light of this a specific site policy is included within the Pre-Submission plan (see Policy LA5).
SHL063	Sweetbriar Lane, Evington	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a train station 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Evington is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community.
SHL064	Gore Field, Eastry	Residential	<ul style="list-style-type: none"> - Distance to a train station - Agricultural Land Classification 	<ul style="list-style-type: none"> - In relation to proximity to facilities, it should be noted that Eastry has a number of facilities and has been designated as a Local Centre (secondary focus for development in the rural area) in the Settlement Hierarchy. A regular bus service provides connections to Canterbury and Sandwich both of which have train stations.
SHL093	Land between Marshborough Lane and Beacon Lane, Woodnesborough	Residential	<ul style="list-style-type: none"> - Distance to Children's play facility - Distance to a primary school - Distance to a train station 	<ul style="list-style-type: none"> - The site is located on bus route to Ash and Sandwich both of which have primary schools and the latter a train station.
STA01C	Land to west of Orchard Lea, Staple	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to a secondary school - Distance to a train station - Hedgerow loss* 	<ul style="list-style-type: none"> - The site is considered suitable for a change to the settlement confines (therefore development should be for fewer than five units). The Pre-Submission plan advises that the hedgerow is to be retained. - In relation to proximity to facilities, it should be noted that Staple is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
STM03	Land at junction of Nelson Park Road, St. Margaret's	Residential	<ul style="list-style-type: none"> - Distance to a primary school - Distance to the AONB 	<ul style="list-style-type: none"> - In relation to identified issues it has been determined that development of the site should be limited to three low rise units to reduce any impact on the AONB. - In relation to proximity to facilities, it should be noted that St. Margaret's is categorised as a village in the settlement hierarchy, suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community. The village has a play area and primary school, although these would be approximately a ten minute walk
WIN02	Builder's Yard, Wingham	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a listed building - Distance to a Conservation Area - Distance to a train station 	<ul style="list-style-type: none"> - Wingham has been identified as a Local Centre in the Settlement Hierarchy, reflecting a range of local facilities including primary school, dentist and local shops. The village is also served by three bus services to Sandwich and Canterbury which have secondary schools and train stations. - A small part of the site has been included within change of confine to enable limited development (outside of flood zones 2 and 3 and restricted to fewer than 5 units).
WIN02C	Land to the north of College Way, Wingham	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a train station 	<ul style="list-style-type: none"> - Wingham has been identified as a Local Centre in the Settlement Hierarchy, reflecting a range of local facilities including primary school, dentist and local shops. The village is also served by three bus services to Sandwich and Canterbury which have secondary schools and train stations.
WIN03	Land to south of Staple Road and Goodnestone Road, Wingham	Residential	<ul style="list-style-type: none"> - Distance to a secondary school - Distance to a train station 	<ul style="list-style-type: none"> - Wingham has been identified as a Local Centre in the Settlement Hierarchy, reflecting a range of local facilities including primary school, dentist and local shops. The village is also served by three bus services to Sandwich and Canterbury which have secondary schools and train stations.

Site	Location	Type	Constraint highlighted by SA ¹²	Dover District Council comments
-	Sandwich Guildhall Car Park	Retail	<ul style="list-style-type: none"> - Distance to a SPA, SAC or RAMSAR - Distance to a Conservation Area 	<ul style="list-style-type: none"> - It is recognised that the site is in a sensitive location. A site specific policy setting out design criterion for the site has been established (see Policy LA12). Given that is a retail site, there would be no additional impact on the European Designations.

Table 12.2: Non-preferred sites not 'flagged' as constrained by the SA; and the Council's comments in response

Site	Address	Type	Dover District Council comments
DEA03	Land behind 273 St Richards Rd, Deal	Housing	<ul style="list-style-type: none"> - This is a small site (0.07ha) with a capacity for two units. As a consequence it is not considered that the provision of a limited amount of housing would outweigh the detrimental landscape impact.
DEA05M	North Barracks, Deal	Mixed Use	<ul style="list-style-type: none"> - This site has the benefit of planning permission; development is under construction.
DEA18	Sholden C of E Primary School	Housing	<ul style="list-style-type: none"> - This site has been withdrawn
DOV24	Land adj Long Hill Playing Field, Roman Road, Dover	Housing	<ul style="list-style-type: none"> - The landscape qualities of this area (the Guston Hills LCA) has recently been assessed for the White Cliffs Landscape Partnership Scheme, and the recommendation here is to 'conserve and create' by removal of landscape detractors and enhancement of hedges. Development would be contrary to the findings of this assessment. In addition, access to the site is via an unmade single track, with passing places, and is not of sufficient width or standard to support any additional development.
NS05DEA	St. Richard's Road	Housing	<ul style="list-style-type: none"> - The site is protected open space and covered by Policy DM25. Any development would result in the loss of formal open space and GI (which would be contrary to Council policy), and should be strongly resisted.
NS06DEA	Cowdray Square	Housing	<ul style="list-style-type: none"> - The site is protected open space and covered by Policy DM25. Any development would result in the loss of formal open space and GI (which would be contrary to Council policy), and should be strongly resisted.
NS07DOV	Noah's Ark Dover	Housing	<ul style="list-style-type: none"> - The site is located within High Meadow Local Nature Reserve and commands a very prominent position. Any development would have a detrimental landscape impact. The site functions well within the context of policy protected GI (Policy CP7) and should be retained as such.
NS12DOV	Edred Road	Housing	<ul style="list-style-type: none"> - The site is located within High Meadow Local Nature Reserve and is considered to have high potential for chalk grassland restoration. Any development would have a detrimental landscape impact. The site functions well within the context of policy protected GI (Policy CP7) and should be retained as such. Furthermore, the site has no direct road access and development would not be possible.

Site	Address	Type	Dover District Council comments
PHS007	Land between Dover Road & Melbourne Avenue	Housing	<ul style="list-style-type: none"> The landscape qualities of this area (the Guston Hills LCA) has recently been assessed for the White Cliffs Landscape Partnership Scheme, and the recommendation here is to 'conserve and create' by removal of landscape detractors and enhancement of hedges. Development would be contrary to the findings of this assessment. In addition, part of the site (to the south west) has been designated as LWS and is an important biodiversity component in GI of the area. Development of the whole site would not be suitable as this would have a detrimental impact on the wider landscape and the historic setting of Sandwich. In addition, KCC Highways object to any development of the site which would result in increased traffic movements through the Dover Road/ Deal Road junction, given that there are known problems.
PHS016	Land between A256 and Woodnesborough Road, Sandwich	Housing	<ul style="list-style-type: none"> Detrimental impact on the wider landscape. Our analysis has shown that there are sequential preferable sites available in Sandwich (in Flood Zone 1). These sites have therefore been selected in preference to any sites located within Flood Zone 2 in Sandwich.
PHS019	Sunnyside Nurseries Woodnesborough Road, Sandwich	Housing	<ul style="list-style-type: none"> The site is visible in long distance views from Western Heights, and offers a green break in Melbourne Avenue. PROW EB12 runs through the site; it comprises an important strategic link in respect of recreation, connecting the Buckland Valley to the North Downs Way, which development would jeopardise. Overall, any development would have detrimental impact on the landscape and impact on the openness between Dover and Whitfield.
SAD15	Melbourne Ave	Housing	<ul style="list-style-type: none"> The site, and its setting, have very good landscape qualities, is located in a prominent position, and is important for biodiversity. Furthermore, the road network immediately surrounding the site is not of sufficient width to accommodate any additional development.
SAD16	Egerton House Roman road	Housing	<ul style="list-style-type: none"> The site has the benefit of extant outline planning permission for B1/B2/B8 employment, and port related uses. The Employment Update (2012) recommends the protection of this site for these employment uses. In considering the site for housing, it is unsuitable due to its highly visible location and the nature conservation interest.
SAD23	Old Park Barracks (3 distinct parcels)	Housing	<ul style="list-style-type: none"> This site is too small to be allocated.
SAN01	Land at 19-37 Woodnesborough Road, Sandwich	Housing	<ul style="list-style-type: none"> Our analysis has shown that there are sequential preferable sites available in Sandwich (in Flood Zone 1). These sites have therefore been selected in preference to any sites located within Flood Zone 2 in Sandwich.
SAN18	Land to south west of Sunnyside Nurseries Woodnesborough Road, Sandwich	Housing	<ul style="list-style-type: none"> Detrimental impact on the wider landscape. Our analysis has shown that there are sequential preferable sites available in Sandwich (in Flood Zone 1). These sites have therefore been selected in preference to any sites located within Flood Zone 2 in Sandwich.

Site	Address	Type	Dover District Council comments
SAND14	Land adjacent to 41 Woodnesborough Road	Housing	- Detrimental impact on the Ancient Monument and the Conservation area. Additional flood risk data (not taken into account as part of the SA methodology) shows that this site is located within the area of 'maximum breach' flood risk.
SHL001	R/o Eclipse recovery site MDR	Housing	- Any access to the site would require third party land. The site located to the south, currently under construction for housing, does not reserve an access to the rear portion. In addition, there would be significant overlooking issues presented by the properties which face the site.
SHL095	Stanhope Road Dover	Housing	- The site is protected Open Space and covered by Policy DM25; the emerging green/open space standards suggest a shortfall within the ward (Buckland). In addition, there are concerns regarding access given that Stanhope Road already serves in excess of 50 dwellings, and is heavily parked on both sides. Due to the topography of Dover any development would be visible in long distance views, particularly from Western Heights.
SHL098	Crabble Athletic Cricket pitch	Housing	- The site is protected open space and covered by Policy DM25. Any development would result in the loss of formal open space and GI (which would be contrary to Council policy), and should be strongly resisted. In addition, the AONB lies to the south of the site (and scores amber within the assessment) and any development would have a detrimental impact on its setting.
UCS04&19	Land adjacent to Dover Priory Station	Housing	- The Plan has identified this area of land as an appropriate location for a car park to serve HS1 and Dover Town Centre- see section on Areas of Change.

PART 3: WHAT ARE THE SA FINDINGS AT THIS CURRENT STAGE?

13 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects on the environment associated with the draft plan approach
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan

- 13.1.1 This chapter presents an appraisal of the Pre-submission Dover District Land Allocations Local Plan. Specifically, this chapter presents an appraisal of:
- The preferred sites coming forward in combination; and
 - Annex 1: Development Management Guidance and Policy, which is a continuation of the Development Management Annex of the Core Strategy.

14 METHODOLOGY

- 14.1.1 The appraisal seeks to predict ‘significant effects’ on the baseline / likely future baseline, drawing on the sustainability objectives identified through scoping (see Part 1) as a methodological framework.
- 14.1.2 Every effort has been made to predict effects accurately; however, predicting significant effects accurately is inherently difficult given the high level nature of site allocations (i.e. it is not possible to be certain of precisely what will come forward on the ground). The ability to predict effects accurately is also limited by the understanding of the baseline and (in particular) the future baseline.
- 14.1.3 Because of these inherent uncertainties there is a need to exercise caution when appraising effects and ensure that, where significant effects have been predicted, this has been done alongside an explanation of the assumptions made. In light of this, a conservative approach is taken to the prediction of effects,¹³ and where effects are predicted this is done with an accompanying explanation of the assumptions made. In many instances it is not possible to predict significant effects (given reasonable assumptions), but it is possible to comment on the merits of the pre-submission plan in more general terms.
- 14.1.4 It is important to note that the ‘significant effects’ are predicted taking into account the criteria presented within Annex II of the SEA Directive.¹⁴ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered.¹⁵

15 APPRAISAL FINDINGS IN RELATION TO THE PRE-SUBMISSION PLAN

- 15.1.1 Table 15.1 considers the effects of the Pre-submission Local Plan. The appraisal is presented under headings that relate to the SA objectives identified through scoping (see Table 9.1).
- 15.1.2 Within each ‘SA objective’ row, there is a separate consideration given to A) the effects of the sites coming forward in combination; and B) the effects of Annex I: Development Management Guidance and Policy (which is a continuation of the Development Management Annex in the Core Strategy).

¹³ As stated by Government Guidance (The Plan Making Manual, see <http://www.pas.gov.uk/pas/core/page.do?pageld=156210>): "Ultimately, the significance of an effect is a matter of judgment and should require no more than a clear and reasonable justification."

¹⁴ Directive 2001/42/EC on the assessment of the effects of certain plans and Programmes on the environment (the ‘SEA Directive’)

¹⁵ In particular, there is a need to take into account the effects of the sites allocated within the Proposed Submission Land Allocations Local Plan acting in combination with the development promoted through the adopted Dover District Core Strategy and the Local Plan (2002) Saved Policies; and the effects of Annex I of the Proposed Submission Land Allocations Local Plan acting in combination with the Core Strategy DM Policies and those DM policies ‘Saved’ from the 2002 Local Plan..

Table 15.1: Appraisal of the pre-submission plan

SA objective	Discussion of 'significant effects'	Recommendations
<p>1 To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home</p>	<p><u>Preferred sites</u></p> <p>No significant effects on the baseline. There is no evidence to suggest that the preferred sites will result in significant effects in relation to this objective. Whilst the Core Strategy, through setting district-wide housing figures, did have a significant effect on the identified issue of district-wide housing need, the same cannot be said for the choice of sites to allocate within the Land Allocations Plan.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. Whilst it is recognised that the requirement to contribute to open space (Policy DM27) is a cost on developers that may affect financial viability, and hence potentially dissuade developers from investing within the district, it is noted that Policy DM 26 does include provision for 'commuted payment'. It is not thought that the guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p> <p>N.B. 'No significant effects' are predicted; however, there may be potential for the policy/guidance presented in Annex 1 to create a 'cumulative financial burden' on developers when implemented alongside the DM policies set within the Core Strategy and those DM policies 'Saved' from the 2002 Local Plan.</p>	<p>The Council should provide a clear statement regarding the extent to which the Land Allocations Local Plan will contribute towards ensuring identified housing needs are met.</p>
<p>2 To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment</p>	<p><u>Preferred sites</u></p> <p>No significant effects on the baseline.</p> <p>The majority of preferred sites (88%) are within the lowest category for flood risk. However, the SA methodology (see Appendix II) has flagged that 10% of the preferred sites are located within flood zone 3. Allocated sites within an area of flood risk will pass through an 'exceptions test' before planning permission can be granted, and as part of this there will be consideration given to mitigating risk.</p> <p>The non-preferred sites face a similar level of flood risk to those that are preferred, with 82% of these sites found in the lowest category.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. Neither the new open space policy (DM27) nor the guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	<p>None</p>

SA objective	Discussion of 'significant effects'	Recommendations
<p>3 To improve the health and well-being of the population and reduce inequalities in health</p>	<p><u>Preferred sites</u> Significant positive effect on the baseline. However, these effects will not be felt until development comes forward, which could be in a number of years time. Good access to a children's play facility is provided by the majority of the preferred residential sites, with 82% found within 600m of these facilities. This should contribute to health and well-being and compares favourable with the non-preferred sites, of which only 68% have good access. Nonetheless, it should be noted that 9% of the preferred sites are 1km or more way from play facilities. In terms of addressing health deprivation, the preferred sites on the whole direct development away from areas of the highest deprivation (87%), so potentially reducing pressure on facilities in these areas. <u>Annex 1</u> Significant positive effect on the baseline. The new policy on open space (DM27) requires that '<i>Planning applications for residential development of five or more dwellings will be required to contribute sufficient accessible green space (parks, gardens, amenity open space, green corridors, informal kick-about areas and informal playable space), outdoor sports facilities, children's equipped play space and community gardens to meet the additional need generated by the development [in accordance with established standards]</i>'. This policy approach performs well in terms of this SA objective.</p>	<p>None</p>
<p>4 To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest</p>	<p><u>Preferred sites</u> Significant positive effect on the baseline. However, these effects will not be felt until development comes forward, which could be in a number of years time. A small proportion of the preferred sites (18%) are allocated within parts of the district where overall deprivation is an identified problem. It is assumed that this development will contribute to the quality of the local environment, and help to ensure that inequalities in overall deprivation within Dover District are reduced. The figure of 18% compares favourably to the non preferred options, with only 7%of these sites found in areas of high overall deprivation. It should be noted however that none of the sites brought forward in these relatively deprived areas are intended to be for employment uses. New employment in areas of relative deprivation could bring particular benefits.</p>	<p>None</p>

SA objective	Discussion of 'significant effects'	Recommendations
	<p><u>Annex 1</u></p> <p>No significant effects on the baseline. Neither the new DM policies (open space and comparison shopping in Deal) nor the new guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	
<p>5 To improve accessibility for everyone to all services, facilities, recreational opportunities and employment</p>	<p><u>Preferred sites</u></p> <p>Significant positive effect on the baseline. The vast majority (99%) of the allocated sites are located within or on the outskirts of existing settlements. The non-preferred sites perform slightly less well (90%).</p> <p>Some of these settlements are 'lower order' and so have limited services and facilities. However, it is difficult to assume that this will lead to problems in relation to access to services and facilities given that settlements will often have a good bus services, and of course the people that choose to live in locations without nearby services and facilities will tend to be those that have access to a private car.</p> <p>In terms of access to education, the preferred sites on the whole perform only moderately well. A small majority of sites (61%) are in close proximity to a primary school, with this comparing well with the non-preferred sites (35%).</p>	<p>Ensure that there is accessibility to primary and secondary school facilities in areas of deficiency.</p> <p>Identify settlements where the plan may create a need for enhanced public transport services.</p>
	<p><u>Annex 1</u></p> <p>Significant positive effect on the baseline. The guidance on Heritage Assets seeks to better understanding of heritage assets in the district, and also ensure that those buildings that have an important 'cultural role' within communities are conserved into the future (through becoming 'locally listed'). The new policy on open space (DM27) seeks to ensure that access to local open space is not eroded as a result of development, and indeed is enhanced.</p>	
<p>6 To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to</p>	<p><u>Preferred sites</u></p> <p>No significant effects on the baseline. Very few of the allocated sites are in close proximity to an AQMA, with just 10% of sites found in moderate proximity. None of these sites are to be allocated for employment uses, which could potentially generate higher levels of traffic than residential developments.</p> <p>Even where sites are in close proximity, there can be little certainty that additional traffic movements generated will contribute to poor air quality within the AQMA.</p>	<p>None</p>

SA objective	Discussion of 'significant effects'	Recommendations
<p>improve</p>	<p><u>Annex 1</u> No significant effects on the baseline. Neither the new DM policies (open space and comparison shopping in Deal) nor the new guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	
<p>7 To conserve and enhance biodiversity</p>	<p><u>Preferred sites</u> No significant effects on the baseline. However, a number of allocated sites are in close proximity to sites of biodiversity importance, with 12% having been found to be located close to areas designated as SSSIs.</p> <p>There is a particular need to give consideration to proximity of development sites that are designated as being of international importance, i.e. SPAs, SACs, and Ramsar sites (most of which are also designated as SSSIs). These sites have been the focus of a separate process of Habitats Regulations Assessment (HRA), which has looked at potential 'causal pathways' by which development could lead to negative effects on biodiversity value. In relation to the following sites the HRA is able to conclude that the Plan will not result significant effects to site 'integrity':</p> <ul style="list-style-type: none"> • Thanet Coast SAC • Dover to Kingsdown Cliffs SAC • Lydden & Temple Ewell Downs SAC • Folkestone to Etchinghill Escarpment SAC • Thanet Coast & Sandwich Bay Ramsar <p>In relation to the Thanet Coast SPA, the HRA considers that due to the existence of an established 'Mitigation Strategy' (under which all new dwellings are required to contribute delivering enhanced management of the SPA) the Land Allocations Plan will not lead to an adverse effect.</p> <p><u>Annex 1</u> Significant positive effect on the baseline. The new open space policy (DM27) identifies that strategic open spaces should achieve Green Flag status, and that the forthcoming Parks and Open Spaces Strategy will set out action plans to achieve this. The guidance on Coastal Change Management Areas should also act to limit development in locations that are sensitive from a biodiversity perspective.</p>	<p>The HRA concludes that, in order to avoid adverse effects on the integrity of Thanet Coast & Sandwich Bay SPA the Council should ensure that the two Urban Expansion Areas at Deal and Sandwich (site PHS013 and PHS17&18) undertake project-level HRA similar to that done for the other Urban Expansion Areas (PHS009 and PHS010) in order to confirm any site specific details of the planning applications that may trigger a requirement for additional measures.</p> <p>Clarify how biodiversity opportunities will be realised at non strategic open spaces.</p>

SA objective	Discussion of 'significant effects'	Recommendations
<p>8 To protect, enhance and make accessible for enjoyment, the countryside and the historic environment</p>	<p><u>Preferred sites</u> No significant effects on the baseline. A number of preferred sites (roughly 15%) are located within or adjacent to the Kent Downs Area of Outstanding Natural Beauty (AONB); however, it is likely that negative effects can be mitigated through design measures that will be the focus of decisions made at the planning application stage. The majority of the preferred sites are not in close proximity to heritage assets. This should help to ensure that negative effects on the historic environment are avoided. It should be noted however that 13% of preferred sites include or are adjacent to a listed building, 16% include or are adjacent to a conservation area, and a single site includes or is adjacent to a scheduled monument. In these locations care must be taken to ensure that new development does not impact on the historic setting given the irreplaceable nature of these assets. <u>Annex 1</u> Significant positive effect on the baseline. The guidance on Heritage Assets should act to ensure that development is sympathetic to the historic character of the Dover District, and hence ensure that this is not eroded over time. In particular, it is noted that the guidance is an important first step towards the identification of a list of locally important heritage assets. Once a list has been established, then this will enable the importance of undesignated local heritage assets to be taken into account in the processing of any planning applications. This policy approach will complement the policy approach presented within policy DM 19 (Historic Parks and Gardens) of the adopted Core Strategy as well as saved Local Plan policies such as CO8 (Development which would adversely affect a hedgerow).</p>	<p>Ensure that new developments brought forward in areas of historic or landscape sensitivity are in keeping with their surroundings</p>
<p>9 To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure</p>	<p><u>Preferred sites</u> No significant effects on the baseline. The plan will allocate many sites to areas away from a train station (49% are over 800m distant). This is far from ideal; however, bus services often provide a regular link to railway stations, and many people (particularly those of working age who commute by train) will be able to cycle. It is also noted that three of the sites to be allocated for employment uses are distant from a train station, with one of these also being distant from the nearest settlement. Given the traffic levels associated with employment developments this leads to the potential for adverse effects.</p>	<p>Ensure that new developments have sustainable transport options available to them in areas of deficiency.</p>

SA objective	Discussion of 'significant effects'	Recommendations
	<p>On the positive side, a large majority (99%) of the allocated sites are located within or on the outskirts of existing settlements. Some of these settlements are 'lower order' and so may have limited sustainable transport options, but settlements will often have a good bus service. It is noted that 10% of non-preferred sites are to be found outside of a settlement.</p> <p><u>Annex 1</u></p> <p>No significant effects. Having said this, the new policy on comparison goods shopping at Deal (DM26) should help to ensure the continued vitality and viability of the town centre by ensuring that appropriate comparison goods shopping comes forward. Town centre vitality is important from a perspective of encouraging alternatives to car given the accessibility of town centres by public transport.</p>	
10 To create a high quality built environment	<p><u>Preferred sites</u></p> <p>No significant effects on the baseline. It is assumed that all developments have the potential to contribute to the quality of the built of the environment, and so the choice of site allocations does not have implications in relation to this objective.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. Neither the new DM policies (open space and comparison shopping in Deal) nor the new guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	None
11 To promote sustainable forms of development and sustainable use of natural resources	<p><u>Preferred sites</u></p> <p>Significant negative effects on the baseline. This assessment reflects the fact that 23% of the preferred sites include Grade 1 or 2 (i.e. high quality) agricultural land. There is little potential to mitigate the loss of high quality agricultural land.</p> <p>On the positive site, it is important to note that 69% of the allocated sites intersect with contaminated land and so represent an efficient use (given that land remediation will occur prior to development).</p> <p>A number of preferred sites intersect with Groundwater Protection Zone 1. Generally, it is only industrial uses that result in risk to groundwater; however there could be some potential for site allocations to result in some cumulative effects. Also, within SPZ1 development can only discharge clean roof runoff to ground (i.e. not from</p>	Ensure that new development does not impact on groundwater quality, directly or cumulatively

SA objective	Discussion of 'significant effects'	Recommendations
	<p>car parks) which can make meeting runoff and Codes for Sustainable Homes requirements more challenging and result in a need for more above ground storage SuDS. Two of the sites allocated for employment uses are found in Groundwater Protection Zone 1. As such, particular care should be taken to ensure that the intended use of these sites does not impact upon groundwater quality.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. Neither the new DM policies (open space and comparison shopping in Deal) nor the new guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	
12 To encourage high and stable levels of employment and sustain economic competitiveness	<p><u>Preferred sites</u></p> <p>No significant effects on the baseline. However, it is noted that none of the allocated employment sites are located in parts of the district where there is currently 'employment deprivation' and, as such, the pre-submission plan represents a missed opportunity in this respect.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. As discussed under SA Objective 1, the setting of additional DM Policy could be seen as having negative implications for 'competitiveness' within the district, i.e. the potential to attract investment and, in particular, developer interest. However, it is not clear that the result will be a significant negative effect. In the long term, a high quality open space resource and a distinctive historic environment will be important for encouraging high and stable levels of employment and sustaining economic competitiveness</p>	None
13 To improve the development and retention of skills	<p><u>Preferred sites</u></p> <p>The choice of site allocations does not have implications in relation to this objective.</p> <p><u>Annex 1</u></p> <p>No significant effects on the baseline. Neither the new DM policies (open space and comparison shopping in Deal) nor the new guidance on Heritage Assets or Coastal Change Management Areas results in any significant implications.</p>	None
14 To ensure that development	<p><u>Preferred sites</u></p> <p>Significant positive effects. Site allocations are spread geographically around the district. Closer analysis</p>	None

SA objective	Discussion of 'significant effects'	Recommendations
<p>benefits everyone in the district</p>	<p>also shows site allocations to be spread between different types of community, including both those that are more and less affluent.</p> <p><u>Annex 1</u></p> <p>Significant positive effects. The new open space policy will act to ensure that local people benefit from development in their neighbourhood.</p>	
<p>Appraisal summary</p>		

The appraisal of the pre-submission plan has considered the effects arising from the preferred site allocations in combination, as well as the effect of Annex 1 of the Land Allocations Local Plan, which is a continuation of Annex 1 of the adopted Core Strategy (i.e. it proposes an approach to supplementing the existing suite of Development Management policies that will be used as the basis upon which to judge planning applications in Dover).

The appraisal has found that:

- There are likely to be **significant positive effects** in terms of '**health and well-being**' resulting both from the preferred sites acting in combination, and the new 'Open Space' development management policy.
- There are likely to be **significant positive effects** in terms of '**poverty and social exclusion**' resulting from the preferred sites acting in combination
- There are likely to be **significant positive effects** in terms of '**accessibility**' resulting from the preferred sites acting in combination, the new 'Open Space' development management policy and also the new guidance on heritage assets.
- There are likely to be **significant positive effects** in terms of '**biodiversity**' resulting both from the new 'Open Space' development management policy.
- There are likely to be **significant positive effects** in terms of '**the historic environment**' resulting from the new guidance on heritage assets.
- There are likely to be **significant negative effects** in terms of '**efficient use of land**' resulting from the preferred sites acting in combination, given the fact that there will be significant loss of good quality agricultural land. On the positive side, it is important to note that 69% of the allocated sites intersect with contaminated land and so represent an efficient use (given that land remediation will occur prior to development).
- There are likely to be **significant positive effects** in terms of '**ensuring that development benefits everyone**' resulting both from the preferred sites acting in combination, and the new 'Open Space' development management policy.

PART 4: WHAT ARE THE NEXT STEPS?

16 INTRODUCTION (TO PART 4)

The report must include...

- A description of the measures envisaged concerning monitoring

16.1.1 This Part of the SA Report explains the next steps that will be taken as part of the plan-making / SA process, including in relation to monitoring.

17 FINALISING THE PLAN

17.1.1 Following consultation on the Plan under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the Council may choose to make amendments to the Pre-Submission Local Plan in light of consultation responses, the findings and recommendations set out within this SA Report or any other new sources of evidence that emerge. Once finalised, the Local Plan will be submitted to Government for examination.

18 PLAN ADOPTION AND MONITORING

18.1.1 Subsequent to examination it is the hope that the plan will be found to be 'sound' by the Government appointed Inspector and will be formally adopted by the Council. At the time of Plan Adoption a 'Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

18.1.2 At the current stage, there is a need to present *'a description of the measures envisaged concerning monitoring'*. As such, set out below are measures that might be taken to monitor development of those sites where the SA has found there to be constraints.

18.1.3 The following is suggested:

- The SA conclusion that there is unlikely to be a significant effect in relation to **flood risk** is based on the assumption that further work will be undertaken to ensure risk is avoided and mitigated. It will be important to monitor development within the flood zone with a view to ensuring that risk does not increase.
- The Council might wish to monitor the types of development that come forward in areas of relative **deprivation** with a view to establishing whether development is supportive of regeneration objectives.
- This SA has been unable to give consideration to the potential to affect sites of local **biodiversity** importance (as opposed to nationally important SSSIs or internationally important SACs, SPAs and Ramsar sites). The Council might wish to put in place targeted measures to monitor the effect of development on these sites.
- The importance of good design in order to avoid impacts to sensitive **landscapes and heritage assets** has been identified through this SA. This could be a focus of monitoring going forward.

APPENDIX I: EXAMINING SCHEDULE 2 OF THE REGS

The Introduction to this SA Report explains that, in order to demonstrate compliance with the requirements of the Environmental Assessment Regulations 2004, SA Reports must answer four questions:

1. What's the scope of the SA?
2. What has Plan-making / SA involved up to this point?
3. What are the appraisal findings at this current stage?
4. What happens next?

Table 1.1 then 'makes the links' between requirements of the Regs – which are set out in Schedule 2 - and these four questions. Table 1.1 is reproduced below, as Table 1A.

The right-hand column of Table A does not quote directly from Schedule 2, but rather reflects a degree of interpretation. As such, Table 1B explains this interpretation. The following points should be read alongside Table 1B:

- References to 'plan or programme' have been shortened to 'plan' given that Local Plans are the focus here.
- The requirement to provide 1) 'an outline of the ... relationship [of the plan] with other relevant plans and programmes' and 2) 'the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan' is taken to mean that a review of the relevant context should be provided.
- Reference to '*such as areas designated pursuant to Directives 79/409/EEC [the Birds Directive] and 92/43/EEC [the Habitats Directive]*' is not given prominence in the interpretation because this is a suggestion rather than a requirement. The Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus of SEA.¹⁶
- The requirement to provide an explanation of 'the way [environmental protection] objectives and any environmental considerations have been taken into account during [plan] preparation' is taken as indicating that the SA Report must explain how SA of alternatives has influenced development of the draft plan.
 - N.B. Legal precedent tells us that the requirement to provide '*outline reasons for selecting the alternatives dealt with*' should be interpreted as having similar implications. Specifically, there is a need to provide outline reasons for selecting the preferred alternative / preferred alternatives, and rejecting others.
- The list of issues that might be a focus of SEA is not given prominence in the interpretation. Again, this reflects the fact that these issues are merely suggested; and that a foremost consideration when undertaking SEA should be the fact that the Regulations are of a procedural nature, i.e. do not seek to prescribe substantive issues that should be a focus of SEA. These issues are, however, a material consideration that can and should be taken into account when scoping SEA.
- The need to provide '*an outline of the reasons for selecting the alternatives dealt with*' is taken primarily as meaning that there is a need to justify the range of alternatives considered (and indeed, the range of issues for which alternatives were considered). However, as discussed above, it is recognised that there is also a need to provide outline reasons for selecting the preferred alternative / preferred alternatives, and rejecting others.

¹⁶ Paragraph 9 of the Preamble to the SEA Directive states that the Directive is 'of a procedural nature'; however, this point is not made within the Regulations.

- The reference to providing ‘a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information’ is not given prominence in the interpretation. This is purely for reasons of brevity. It is, of course, important that this requirement is met both in relation to the appraisal of alternatives and in relation to the appraisal of the draft plan.
- Reference to ‘in accordance with Article 10’ is removed for brevity.
- Reference to providing ‘a non-technical summary...’ is not reflected given that our aim is to establish the information to be provided within the main body of SA Reports. The requirement to provide an NTS is a stand-alone consideration.

Finally, it will be noted that references to ‘the environment’ have been retained, despite the fact that the starting assumption is that there is a need to give particular attention to environmental issues does not apply to SA. Again, this is largely for purposes of brevity and clarity. It is a helpful reminder to readers that the procedural requirements of SA stem from, and indeed are precisely the same as, those for SEA.

Table 1A: Questions that must be answered (sequentially) within the SA Report

SA QUESTION	SA SUB-QUESTION	CORRESPONDING REQUIREMENT OF THE ENV ASSESSMENT REGS (THE REPORT MUST INCLUDE...)
What's the scope of the SA?	What's the Plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan
	What's the sustainability 'context'?	<ul style="list-style-type: none"> The relationship of the plan with other relevant plans and programmes The environmental protection objectives, established at international, Community or Member State level, relevant to the plan
	What's the sustainability 'baseline' at the current time?	<ul style="list-style-type: none"> The relevant aspects of the current state of the environment The environmental characteristics of areas likely to be significantly affected
How would the baseline evolve without the plan?	What are the key issues that should be the focus of SA?	<ul style="list-style-type: none"> The likely evolution of the current state of the environment without implementation of the plan Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance
	What has Plan-making / SA involved up to this point?	<ul style="list-style-type: none"> An outline of the reasons for selecting the alternatives dealt with The likely significant effects on the environment associated with alternatives An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.
	What are the appraisal findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects on the environment associated with the draft plan The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
What happens next?		<ul style="list-style-type: none"> A description of the measures envisaged concerning monitoring

Table 1B: Interpreting Schedule 2 requirements

Interpretation of Schedule 2 Requirements as presented in Table 1A, above

Schedule 2 requirements

<p>An outline of the contents, main objectives of the plan</p> <p>The relationship of the plan with other relevant plans and programmes</p> <p>The environmental protection objectives, established at international, Community or Member State level... relevant to the plan</p> <p>The relevant aspects of the current state of the environment</p> <p>The environmental characteristics of areas likely to be significantly affected</p> <p>The likely evolution [of the baseline] without implementation of the plan</p> <p>Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance</p> <p>An outline of the reasons for selecting the <u>alternatives</u> dealt with</p> <p>The likely significant effects on the environment' associated with <u>alternatives</u></p> <p>An outline of the reasons for selecting preferred alternatives / a description of how environmental objectives and considerations are reflected in the draft plan.</p> <p>The likely significant effects on the environment associated with <u>the draft plan</u></p> <p>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan</p> <p>A description of the measures envisaged concerning monitoring</p>	<p>(1) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;</p> <p>(2) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;</p> <p>(3) the environmental characteristics of areas likely to be significantly affected;</p> <p>(4) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;</p> <p>(5) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;</p> <p>(6) the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;</p> <p>(7) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p> <p>(8) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p> <p>(9) a description of the measures envisaged concerning monitoring in accordance with Regulation 17;</p> <p>(10) A non-technical summary of the information provided under paragraphs 1 to 9.</p>
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APPENDIX II: APPRAISAL OF SITE OPTIONS

Methodology

Site options were subjected to SA utilising a strict 'site appraisal question' based methodology. Site appraisal questions were developed to reflect the sustainability objectives identified through SA scoping as far as possible – see Table 2A; however, given data availability¹⁷ the site appraisal questions that it has been possible to ask/answer are limited in scope.

Table 2A: Scope of the site appraisal methodology

SA objective	Questions it was possible to answer given the data available	Questions that might ideally have been answered were data available
To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Is the site allocated for housing and located within a part of the district where there is particular housing need?
To reduce and manage the risk of flooding and any resulting detriment to public well-being, the economy and the environment	<ul style="list-style-type: none"> Is the site within a flood zone? 	<ul style="list-style-type: none"> Is the site at risk from surface water flooding? Is the site a Coastal Change Management Area?
To improve the health and well-being of the population and reduce inequalities in health	<ul style="list-style-type: none"> How far is the nearest children's play space? Is the site within an area that suffers from problems of health deprivation? 	<ul style="list-style-type: none"> How far is the nearest outdoor sports facility? How far is the nearest park, open space or multifunctional greenspace? How far is the nearest allotment space? Would allocation of the site lead to the loss of a significant outdoor sports facility, children's play space, green space or allotments?
To reduce poverty and social exclusion and close the gap between the most deprived areas and the rest	<ul style="list-style-type: none"> Is the site within an area that suffers from problems of overall deprivation? 	<ul style="list-style-type: none"> Is the site in a deprived area where development is required in order to support regeneration?
To improve accessibility for everyone to all services, facilities, recreational opportunities and employment	<ul style="list-style-type: none"> Is the site within the boundaries of a settlement? How far is the nearest primary school? How far is the nearest secondary school? 	<ul style="list-style-type: none"> How far is the nearest health centre or GP service? Would the allocation lead to a loss of community facilities? Would the allocation lead to the loss of a significant recreational resource (not open space)?
To reduce air pollution (including greenhouse gas emissions) and ensure air quality continues to improve	<ul style="list-style-type: none"> Is the site in or near to an Air Quality Management Area (AQMA)? 	<ul style="list-style-type: none"> Will development of the site lead to increased traffic movements within an AQMA?

¹⁷ Given the imperative of achieving consistency and transparency it is only possible to draw on data-sets for which data is available for each and every site option.

SA objective	Questions it was possible to answer given the data available	Questions that might ideally have been answered were data available
To conserve and enhance biodiversity	<ul style="list-style-type: none"> How far is the nearest Special Protection Area, Special Area of Conservation or Ramsar site? How far is the nearest Site of Special Scientific Interest? How far is the nearest ancient semi-natural woodland? 	<ul style="list-style-type: none"> How far is the nearest locally designated wildlife site? Will allocation impact on an ecological corridor? Does the site contain any BAP priority species or habitats?
To protect, enhance and make accessible for enjoyment, the countryside and the historic environment	<ul style="list-style-type: none"> How far is the nearest Scheduled Monument? How far is the nearest listed building? How far is the nearest Conservation Area? How far is the nearest Historic Park or Garden? Is the site within an area designated as heritage coast? How far is the site from the Kent Downs Area of Outstanding Natural Beauty? 	<ul style="list-style-type: none"> Is the site within an area that contributes to the setting of a heritage asset / area of heritage importance?
To create a high quality built environment	<ul style="list-style-type: none"> This SA objective is not relevant to the appraisal of site allocations. 	
To reduce the need to travel, encourage alternatives to the car, and make the best use of existing transport infrastructure	<ul style="list-style-type: none"> Is the site within the boundaries of a settlement? How far is the nearest train station? 	<ul style="list-style-type: none"> How far is the nearest high quality public transport route? How far is the nearest cycle route?
To promote sustainable forms of development and sustainable use of natural resources	<ul style="list-style-type: none"> Is the site in a Groundwater Protection Zone? Is the site located on high quality agricultural land? Does the site include contaminated land? 	<ul style="list-style-type: none"> Is the site in the abstraction area for the River Dour? Will the allocation make use of previously developed land (PDL)?
To encourage high and stable levels of employment and sustain economic competitiveness	<ul style="list-style-type: none"> Is the site in an area with 'employment' deprivation? 	<ul style="list-style-type: none"> How far is the nearest employment hub or industrial area? Will the allocation result in loss of employment or employment land?
To improve the development and retention of skills	<ul style="list-style-type: none"> This SA objective is not relevant to the appraisal of site allocations. 	
To ensure that development benefits everyone in the district	<ul style="list-style-type: none"> This SA objective is not relevant to the appraisal of individual site allocations. There is the potential to examine whether site allocations acting in combination will contribute to this objective. 	

Table 2B presents a concise list of the appraisal questions answered for the site options, along with the 'decision rules' used to categorise answers. A **red** categorisation equates to the prediction of a significant adverse effect, an **amber** categorisation equates to the prediction of an adverse effect, and a **green** categorisation equates to the prediction of an effect that is either positive or non-adverse.

The decision rules are quantitative. This allows for the analysis of the sites to be undertaken using Geographical Information System (GIS) software. No qualitative information / professional judgement has been drawn on when categorising sites as red, green or amber.

Most of the rules are distance related. It is important to note that all distances are 'as the crow flies' as it was not possible to take account of the distance of the route that would be taken in practice (e.g. when walking or travelling by car). Most distance rules have been developed internally by the plan-making / SA team, following a review of thresholds applied as part of Site Allocation / SA processes elsewhere in England. A number of thresholds reflect the assumption that 400m is a distance that is easily walked by those with young children and the elderly.

Table 2B: Site appraisal questions and decision rules

Appraisal question	Decision rules
Is the site within a flood zone?	R = Flood risk zone 3 A = Flood risk zone 2 G = Flood risk zone 1
How far is the nearest children's play space?	R = 1km A = 600m – 1km G = Less than 600m, or allocation is for employment/retail
Is the site within an area that suffers from problems of health deprivation?	A = Within one of the 20% most deprived Super Output Areas nationally, according to the Index of Multiple Deprivation 2010 G = Not within one of the 20% most deprived SOAs nationally, or allocation is for employment
Is the site within an area that suffers from problems of overall deprivation?	A = Not within one of the 20% most deprived Super Output Areas nationally, according to the Index of Multiple Deprivation 2010 G = Within one of the 20% most deprived SOAs nationally
How far is the nearest primary school?	R = >800m A = 400m – 800m G = <400m, or allocation is for employment/retail
How far is the nearest secondary school?	R = >5km A = 2 – 5km G = <2km, or allocation is for employment/retail
Is the site in or near to an AQMA?	R = Within or adjacent an AQMA A = <1km from an AQMA G = >1km from an AQMA
How far is the nearest Special Protection Area, Special Area of Conservation or Ramsar site?	R = <1km from an SPA/SAC/Ramsar A = 1-5km from an SPA/SAC/Ramsar G = >5km from an SPA/SAC/Ramsar
How far is the nearest Site of Special Scientific Interest?	R = <400m from an SSSI A = 400 – 800m from an SSSI G = >800m from an SSSI
How far is the nearest ancient semi-natural woodland?	R = Includes or is adjacent to ASNW A = <400m from AWWN G = >400m from an AWWN

How far is the nearest Scheduled Monument?	R = Includes or is adjacent to a SAM A = <100m from a SAM G = >100m from a SAM
How far is the nearest listed building?	R = Includes or is adjacent to a listed building A = <100m from a listed building G = >100m from a listed building
How far is the nearest Conservation Area?	R = Includes or is adjacent to a Conservation Area A = <100m from a Conservation Area G = >100m from a Conservation Area
How far is the nearest Historic Park or Garden?	R = Includes or is adjacent to a historic park or garden A = <100m from a historic park or garden G = >100m from a historic park or garden
Is the site within an area designated as heritage coast?	R = Within G = Not within
How far is the site from the Kent Downs Area of Outstanding Natural Beauty?	R = Within the AONB or within 20m of the AONB A = <5km G = >5km
How far is the nearest settlement?	R = >1km A = 400m - 1km G = <400m
How far is the nearest train station?	R = >2km A = 1km – 2km G = <1km
Is the site within a Groundwater Protection Zone?	A = Within Protection Zone 1 G = Not within Protection Zone 1
Is the site located on high quality agricultural land?	R = Includes Grade 1 or 2 agricultural land A = Includes Grade 3 agricultural land G = Does not include Grade 1, 2 or 3 agricultural land
Does the site include contaminated land?	A = No G = Yes
Is the site within an area of employment deprivation?	A = Not within the 20% most deprived SOAs for employment, according to the Index of Multiple Deprivation, 2010 G = Within the 20% most deprived SOAs for employment, or allocation is for residential

Appraisal findings

Tables 2C and 2D present appraisal findings in relation to each of the site options. For ease of interrogation, the sites are split between the two tables according to whether they were:

- Subsequently determined to be ‘preferred’ by the Council, and hence are now ‘allocated’ within the pre-submission plan; or
- Subsequently determined to be ‘non-preferred’ / have not taken forward as an allocation in the pre-submission plan.

Table 2C: Appraisal of preferred site options (i.e. those that area allocated within the pre-submission plan)

Site	Location	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment	
CAP03	Land to north of junction with Capel St and Winehouse Lane	Confines (residential)																							
DEA29	Stalco	Residential																							
DEA30	Stalco	Residential																							
EAS02/SHL059	Easry Court Farm	Confines (residential)																							
EAS05	Land to west of Gore Lane	Residential																							
KIN03C	Land between Innisfree and Glen Lodge, Glen Road	Confines (residential)																							
LA1	White Cliffs Business Park Phase II, Dover	Employment																							
LA1	White Cliffs Business Park Phase III, Dover	Employment																							
LDF01	Land at Homeside	Residential																							
LDF015	Land to south of New Dover Road, Capel	Residential																							
LDF017	Land btw village hall and Bothy, Kingsdown	Residential																							
LDF018	Land off Mill Lane, Shepherdswell	Residential																							
LDF03	Laslett's Yard, Woodnesborough	Residential																							
LDF030	Buckland Mill	Residential																							
LDF031	Coombe Valley	Residential																							
LDF036	Barwick Road	Residential																							
LDF037	Westmount	Residential																							

Site	Location	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment
LDF04	Land btwn Cherry Garden Lane and 79 Sandwich Road, Ash	Residential																						
LDF041	East Studdal Nursery	Residential																						
LDF06	Charlton Sorting Office	Residential																						
LDF08	Factory Building Lorne Road	Residential																						
MON01C	Northbourne Road, Gt Mongeham	Residential																						
MON02C	Great Mongeham Farm	Confines (residential)																						
MON04C	Mongeham Farm	Confines (residential)																						
NS01DEA	Former South Deal CPS	Residential																						
NS01NON	Land at Lynton, Mill Lane, Nonnington	Confines (Residential)																						
NS01SHE	Land to west of Coxhill, Sheperdiswell	Residential																						
NS01/03SJM	No 2 and garden Townsend Farm Bungalow, St Margaret's	Residential																						
NS02EAS	Works to rear of Coronation Cottage, Mill Lane	Confines (residential)																						
NS03SUT	Land at Homestead Lane, East Studdal	Confines (residential)																						
NS08DOV	Wycherley Crescent	Residential																						
NS16DOV	Former TA Centre	Residential																						
PHS09	Land Btw Deal and Sholden	Residential																						
PHS10	Land NW of Sholden	Residential																						

Site	Location	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment
PHS13	Btw 51-77 Station Road Walmer	Residential	Green	Green	Green	Yellow	Red	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green	Green	Yellow	Green	Green	Green	Green	Yellow	Green
PHS17&18	West of St Bart's Rd Sandwich	Residential	Yellow	Green	Green	Yellow	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
PP007	Coombe Valley	Residential	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD19A	Coombe Valley	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD19B	Coombe Valley	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD19C	Coombe Valley	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD19D	Coombe Valley	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD19E	Coombe Valley	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD24	Former Council Yard, Molland Lea, Ash	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD28	Garage Yard, Kingsdown	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAD31	Land to rear of St. Richard's Road	Residential	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAN04	Archer's Low Farm, St George's Road	Residential	Green	Green	Green	Green	Red	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SAN13	Land adj to Sandwich Technology School	Residential	Green	Green	Green	Green	Green	Green	Green	Red	Yellow	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SHE04V	Land at 4 Mill Lane, Shepherdswell	Confines (residential)	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SHL011	Site at Millfield, Ash (smaller area)	Residential	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SHL012	Land at Sandwich Road, Ash	Confines (residential)	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green
SHL015	Prima Windows, Nonington	Residential	Green	Green	Green	Green	Red	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green	Green

Site	Location	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment
SHL025	Old Chalk Pit, Heronden Road	Residential																						
SHL026	Land at Chequer Lane, Ash	Residential																						
SHL031	Adelaide Road, Eythorne	Confines (residential)																						
SHL035	North of Langdon CPS	Residential																						
SHL037	Albany Place	Residential																						
SHL042	Canterbury Road, Lydden (larger site is preferred)	Residential																						
SHL048	Land between Stoneleigh and Nine Acres, Woodnesborough	Residential																						
SHL050	Manor View Nursery, Temple Ewell	Residential																						
SHL060	Land between 107 and 127 Capel Street, CLF	Residential																						
SHL062	Land adj to Melbourne CP	Residential																						
SHL063	Sweetbriar Lane, Elvington	Residential																						
SHL064	Gore Field, Eastry	Residential																						
SHL070	Old Park Hill	Residential																						
SHL079	Dunedin Drive	Residential																						
SHL093	Land btwn Marshboro Rd Beacon La, Woodnesborough	Residential																						
STA01C	Land to w of Orchard Lea, Staple	Confines (residential)																						
STM03	Land at jct Station Rd Nelson PK Rd, St Margs	Confines (residential)																						

Site	Location	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment
WIN02	Builder's Yard, Wingham (smaller area = preferred)	Residential																						
WIN02C	Land north of College Way, Wingham	Confines (residential)																						
WIN03	Land to s of Staple Rd and n of Goodestone Rd, Wingham	Confines (residential)																						
-	Sandwich Guildhall Car Park	Retail																						

Table 2D: Appraisal of non-preferred site options (i.e. those that are not allocated within the pre-submission plan)

Site	Type	Food zone	Children's play facility	Area of deprivation: Health	Area of deprivation: Overall	Distance to primary school	Distance to secondary school	AQMA	Distance to SAC, SPA or Ramsar	Distance to SSSI	Ancient Semi-natural woodland	Scheduled Monument	Listed Building	Conservation area	Historic park / garden	Heritage coast	AONB	Distance to settlement	Train station	Groundwater	Agricultural land	Contaminated Land	Area of deprivation: employment	
ALK01	Residential	Red			Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ALK01C	Residential				Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ALK02V	Residential	Red			Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ASH02	Residential				Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ASH02V	Residential				Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ASH03	Residential				Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
ASH05	Residential		Red		Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
AYL02	Residential			Yellow	Green	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
AYL03	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
BET01	Residential		Red		Yellow	Green	Yellow		Yellow	Red	Yellow		Red				Red		Red				Yellow	
CAP01	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
CAP01C	Residential		Yellow		Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
CAP02	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
CAP02M	Mixed Use				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
CAP06	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
CH01	Residential		Red		Yellow	Red	Yellow		Yellow	Red	Yellow						Red		Red				Yellow	
DEA01M	Mixed Use	Red			Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
DEA03	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
DEA04M	Mixed Use	Red	Yellow		Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
DEA05M	Mixed Use				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	
DEA07	Residential				Yellow	Yellow	Red		Yellow	Red	Yellow						Red		Red				Yellow	



HRA/AA for Land Allocations Pre-Submission Local Plan Development Plan Document

Draft report
August 2012

Prepared for
Dover District Council

Revision Schedule

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01	31/08/12	Draft for client review	JR Principal Ecologist	SP Technical Director	JH Technical Director

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1 Introduction

1.1 Background

- 1.1.1 URS. has been commissioned by Dover District Council (DDC) to carry out a Habitat Regulations Assessment (HRA) of the Land Allocations Pre-Submission Local Plan (the Plan) DPD. The DPD will form part of the Dover Local Development Framework (LDF).
- 1.1.2 In parallel with this process, a Sustainability Appraisal has been produced under the requirements of EU Directive (2001/42/ES), commonly referred to as the Strategic Environmental Assessment Directive.
- 1.1.3 It is a requirement of the EU ‘Habitats Directive’ 1992 (hereafter referred to as the Habitats Directive)¹ and the Conservation of Habitats and Species Regulations 2010 (Box 1) that ‘land use plans’ (including local authority Local Development Frameworks (LDFs)) are subject to an ‘Appropriate Assessment’ (AA) if it is likely that they will lead to significant adverse effects on a Natura 2000 site (Special Areas of Conservation (SACs), and Special Protection Areas (SPAs)). As a matter of UK Government policy Ramsar sites², candidate Special Areas of Conservation (cSAC) and proposed Special Protection Areas (pSPA) are given equivalent status. These protected sites are collectively referred to as ‘European sites’ in this report.

Box 1. The legislative basis for Appropriate Assessment

EU ‘Habitats Directive’ 1992

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives.”

Article 6 (3)

Conservation of Habitats and Species Regulations 2010

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site or a European Offshore Marine Site (either alone or in combination with other plans or projects) ... must make an appropriate assessment of the implications for the site in view of that sites conservation objectives ... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site ...”

- 1.1.4 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. This is in contrast to the Strategic Environmental Assessment (SEA) Directive which does not prescribe how plan or programme proponents should respond to the findings of an environmental assessment; it simply says that the assessment findings (as documented in the ‘environmental report’) should be ‘taken into account’ during preparation of the plan or programme. In the case of the Habitats Directive,

¹ Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

² Wetlands of International Importance designated under the Ramsar Convention 1979

potentially damaging plans and projects may be permitted only if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the Natura 2000 network of protected sites.

- 1.1.5 As assessment of plans has developed, the term Habitats Regulations Assessment (HRA) has come into currency for describing the overall assessment process (including screening to determine whether significant adverse effects are likely or not) and this term is used below when necessary to distinguish the process from the 'Appropriate Assessment' stage itself.

1.2 Scope of HRA

- 1.2.1 The scope of the HRA was confirmed through the Core Strategy HRA process in 2009. The HRA of the Submission Stage Dover Core Strategy (January 2009) provides a useful overview of potential adverse effects. It identified the following adverse effects on European sites arising from potential development across Dover under Core Strategy Policy CP11:

- Increased disturbance of wintering waterfowl arising from additional recreational pressure on Thanet Coast & Sandwich Bay SPA;
- Erosion/trampling damage and possible nutrient enrichment as a result of increased recreational activity at Lydden to Temple Ewell Downs SAC;
- A possible increase in eutrophication of the calcareous grassland at Lydden to Temple Ewell Downs SAC due to increased nitrogen deposition arising from NOx emissions linked to increased vehicle movements on the A2, which lies within 200m of the SAC; and
- Recreational pressure and air quality impacts at Dover to Kingsdown Cliffs SAC.

- 1.2.2 This was principally associated with the four strategic development areas in Dover district (Whitfield Urban Extension, Connaught Barracks, Dover Mid-Town and Dover Waterfront). Those strategic sites are the subject of separate DPDs or SPDs and therefore do not feature in this Plan DPD. Due to the limited data available at that time, the Core Strategy assessment was highly precautionary. Since the Core Strategy was adopted, further data have come to light or been specifically collected, which enable these impacts to be refined through the HRA process. Figure 1 illustrates the sites that have been allocated in the Plan, within the context of European sites.

2 Methodology

2.1 The Process of HRA

2.1.1 The HRA has been carried out in the continuing absence of formal Government guidance. Communities & Local Government (CLG) released a consultation paper on AA of Plans in 2006³. As yet, no further formal guidance has emerged although informal guidance documents exist, produced by RSPB and for internal use by Natural England. **Figure 2** below outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.

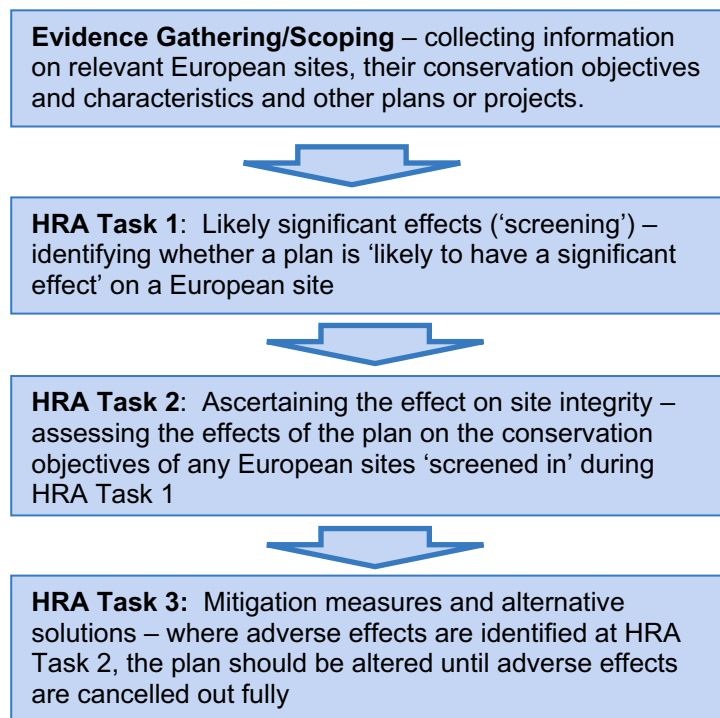


Figure 2: Four-Stage Approach to Habitat Regulations Assessment

2.2 HRA Task One: Likely Significant Effects (Screening)

2.2.1 The first stage of any Habitat Regulations Assessment is a Likely Significant Effect (LSE) or screening test - essentially a high level risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required, and on which aspects any AA will need to be focussed. The essential question is: *"Is the [plan] (or any part of the [plan]), either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*

2.2.2 In this case, it is considered that the 'screening' exercise was effectively completed during the Core Strategy HRA process and therefore for simplicities sake, this report focuses on the Appropriate Assessment (HRA Task Two).

³ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

2.3 HRA Task Two: Appropriate Assessment

- 2.3.1 The most productive assessment can be generated in defining the environmental conditions and criteria that are fundamentally important for the persistence and favourable conservation status of the interest features for which the site was designated (e.g. minimal trampling, low grazing pressure, high water quality etc). By undertaking this short exercise, it is relatively easy to then identify the vulnerabilities of the European site to development.
- 2.3.2 By organising the report on a European site basis, a more holistic approach to assessment is achieved which is more in line with the spirit of the Habitats Directive. In order to provide transparency, any report organised along 'European site' lines would also include Appendices that would list each element of development proposals in Deal and the AA conclusion in a tabular format thus enabling confirmation as to the policies and sites assessed while at the same time allowing a holistic approach to the actual assessment.

2.4 Assessment 'in combination'

- 2.4.1 It is a requirement of the Regulations that the impacts and effects of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the European site(s) in question. As mentioned earlier, the HRA of the Core Strategy identified a series of effects on European sites which could not be ruled out given the level of information as it stood at that time. However, these were identified only as arising when development was considered 'in combination' (as required by the Habitats Directive) with the remaining homes to be delivered in Dover District over the Core Strategy period (and with regard to Thanet Coast & Sandwich Bay SPA, also from housing in Thanet District).

2.5 HRA Task Three: Avoidance/Mitigation

- 2.5.1 Where required recommendations for mitigation have been prepared.

3 Thanet Coast SAC

3.1 Introduction

3.1.1 The Thanet Coast SAC lies approximately 10km to the north of Deal and runs around the entire north-east Kent coast from south of Ramsgate to Westgate-on-Sea. It is contained entirely within Thanet district.

3.2 Reasons for Designation

3.2.1 The Thanet Coast SAC is designated for its reefs and sea caves, both of which are effectively inaccessible from land.

3.3 Condition Assessment

3.3.1 During the most recent condition assessment, Natural England judged 99% of the constituent SSSI to be in either favourable or recovering condition. There is no direct correlation between the condition of a SSSI and the favourable condition of SAC interest features, but where the SAC and SSSI interest features are essentially the same, a favourable SSSI condition is likely to mean that SAC condition is reasonable.

3.3.2 Natural England in their consultation response to the HRA Scoping Report dated 06/07/11 sought clarification on this point stating '*Whilst it is acknowledged that the condition assessments undertaken for Sites of Special Scientific Interest (SSSI) can provide a general indication of the status of the habitat(s) and/or species for which European sites are notified, they should not be considered a condition assessment of the Special Protection Areas, Special Areas of Conservation or Ramsar Sites*'. We concur with this statement and this caveat would apply throughout the HRA.

3.4 Key Environmental Conditions

3.4.1 The following key environmental conditions are identified for the SAC:

- No erosive activities;
- Unpolluted water;
- Absence of nutrient enrichment;
- Absence of non-native species;
- Minimal activities that alter sediment characteristics.

3.5 Likely Significant Effects

3.5.1 The sea caves are resilient to recreational damage. Reefs are theoretically vulnerable to excessive abrasion due to boating and similar sources. However, in reality the vast majority of people involved in such water-based recreation will avoid the reefs due to the dangers involved in striking them with boats and other watercraft.

3.5.2 A visitor survey undertaken for the Thanet Coast Project⁴ indicated that the majority of visitors to the Thanet Coast derive from Thanet itself. This is supported by the Dover Green Infrastructure Survey (Broadway Malyan, 2010) which summarises the destinations that survey respondents from Deal travel to but does not include any areas within the Thanet Coast SAC.

3.5.3 Given the resilience of the features for which the SAC is designated, the general absence of visitors who derive from the Deal area and the fact that there are accessible areas of coast closer to Deal itself it is considered that housing development in Dover district is unlikely to lead to significant effects on the Thanet Coast SAC even when considered 'in combination' with other projects and plans.

3.6 Conclusion

3.6.1 It can be concluded with confidence that significant effects on the interest features of Thanet Coast SAC are unlikely to occur from development outlined in this Plan

⁴ Data supplied in an email from Emma Dadds (Thanet Coast Project) to James Riley (URS/Scott Wilson) on 25/06/10

4 Sandwich Bay SAC/ Thanet Coast & Sandwich Bay SPA

4.1.1 Sandwich Bay SAC occupies much of the Dover District coastline from the north-east tip (north of Great Stonar) down to Deal. Sandwich Bay SAC is essentially designated for its sand dune succession:

- Embryonic shifting dunes - The embryonic shifting dunes at Sandwich Bay are representative of this habitat type in southeast England. The seaward edge of the north of this site displays a good sequence of embryonic shifting dune communities and there is a clear zonation within the dune habitat, with strandline species on the seaward edge and sand-binding grasses inland. Lyme-grass *Leymus arenarius* is extremely sparse and sand couch *Elytrigia juncea* is the dominant sand-binding species;
- Shifting dunes along the shoreline with marram - Shifting dunes along the shoreline with *Ammophila arenaria* (marram) occurs along the seaward edge of the northern half of this extensive dune system. It is representative of shifting dune vegetation in southeast England, a region where the habitat type is very restricted in its distribution. Although the area of this habitat type is small by comparison with other listed sites, the shifting dune vegetation contains a good range of characteristic foredune species including sea bindweed *Calystegia soldanella*, sea spurge *Euphorbia paralias* and sea-holly *Eryngium maritimum*;
- Dune grassland – Sandwich Bay is a largely inactive dune system with a particularly extensive representation of fixed dune grassland, the only large area of this habitat in the extreme south-east of England. The vegetation is extremely species-rich and the site has been selected because it includes a number of rare and scarce species, such as fragrant evening-primrose *Oenothera stricta*, bedstraw broomrape *Orobancha caryophyllacea* and sand catchfly *Silene conica*, as well as the UK's largest population of lizard orchid *Himantoglossum hircinum*;
- Dunes with creeping willow - The small area of dunes with *Salix repens ssp. argentea* (creeping willow) found at Sandwich Bay is of interest as it is the only example found in the dry south-east of England and is representative of this habitat type in a near-continental climate; and
- Humid dune slacks.

4.1.2 The Thanet Coast & Sandwich Bay SPA is designated for populations of European importance of the following migratory species:

- Turnstone (wintering);
- Golden Plover (wintering); and
- Little Tern (breeding – while the terns haven't actually bred for a number of years the site remains designated for the species).

4.1.3 Turnstone *Arenaria interpres* feed on sandy beaches and rocky shores along the north-east Kent coast particularly in areas of loose stones or seaweeds. Their preferred food includes peeler crabs, small crustaceans such as shrimps, and barnacles, as well as marine molluscs such as periwinkles. They may continue to forage at high tide on areas of washed up weed at the tideline. Roosting within the SPA occurs from Swalecliffe to Pegwell Bay mainly on areas of sand and shingle

but also on man made structures such as the sea wall. Additionally, some birds roost on fields at the top of the cliffs and other areas of open space landward of the boundary of the SPA.

- 4.1.4 Golden plover *Pluvialis apricaria* winter on land around Sandwich Bay. In recent years the golden plover have taken to roosting in large numbers on the intertidal mudflats of the bay. It is likely that, whilst there, some feeding takes place but this is not their prime feeding habitat. Their main feeding habitat is on arable fields and grazing marsh located inland of the dunes of Sandwich Bay. Mudflats and sandflats in Pegwell Bay and Sandwich Bay provide roosting grounds for golden plover.

4.2 Condition Assessment

- 4.2.1 During the most recent condition assessment (completed in July 2009), Natural England judged 61% of the principal constituent SSSI of the Thanet Coast and Sandwich Bay (Sandwich Bay to Hacklinge Marshes SSSI) to be in favourable condition. Parts of the site were unfavourable, largely through issues related to inappropriate grazing, choking of waterways and some levels of eutrophication.

4.3 Key Environmental Conditions

- 4.3.1 The following key environmental conditions were identified for all the sites:
- Sufficient space between the site and development to allow for managed retreat of intertidal habitats and avoid coastal squeeze;
 - No dredging or land-claim of coastal habitats;
 - Unpolluted water;
 - Absence of nutrient enrichment;
 - Absence of non-native species;
 - Maintenance of freshwater inputs;
 - Balance of saline and non-saline conditions;
 - Minimal disturbance; and
 - Minimal activities that alter sediment characteristics.

4.4 Assessment

Recreational pressure/disturbance

Sandwich Bay SAC

- 4.4.2 Most types of aquatic or terrestrial European site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths. Motorcycle scrambling and off-road vehicle use can cause more serious erosion.

4.4.3 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:

- Wilson & Seney (1994)⁵ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.
- Cole et al (1995a, b)⁶ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow & grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole (1995c)⁷ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
- Cole & Spildie (1998)⁸ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance

4.4.4 Sandwich Bay SAC is essentially designated for its sand dune succession. These features are not insensitive to disturbance but they are resilient in that they

⁵ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

⁶ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

⁷ Cole, D.N. 1995c. Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah.

⁸ Cole, D.N., Spildie, D.R. 1998. Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

depend on a certain amount of disturbance to maintain all the relevant successional stages (scrub cutting programmes have had to be undertaken within the SAC in the past implying that there has been too little disturbance to maintain the successional stages). A very high level of constant abrasion (particularly from sources such as off-road vehicles) would be required to actually retard the succession entirely or erode the fabric of the dunes themselves to a degree that outpaced dune accretion.

- 4.4.5 In addition to the inherent resilience of sand dunes, activity on the dunes within the SAC is constrained by the fact that most of the dunes fall within the boundaries of golf courses (constituting 'rough') rather than having entirely unconstrained access; while footpaths do traverse these courses there are considerable restrictions on off-track usage through the golfing use of the dune system.
- 4.4.6 Nonetheless, Kent Wildlife Trust in their consultation response to the HRA Scoping Report for the Deal Transport and Flood Alleviation Study commented that *'As managers of Sandwich Bay we would also wish to highlight a further impact to be considered. Although official car parking is limited within the Sandwich Bay Estate, hundreds of people park on the sand dunes on a daily basis causing damage to the sensitive flora for which the SAC is designated. There is a toll for this parking but by accessing the estate via the Deal ancient highway this can be avoided and many visitors are willing to pay the toll to access the bay'*. This indicates that recreational pressure impacts are not focussed solely on the SPA interest features.

Thanet Coast & Sandwich Bay SPA

Background

- 4.4.7 Concern regarding the effects of disturbance on birds in particular, stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding⁹. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds.¹⁰ Moreover, the more time a breeding bird spend disturbed from its nest, the more its eggs are likely to cool and the more vulnerable they are to predators. This particularly applies to ground-nesting birds such as little tern.
- 4.4.8 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages. Several empirical studies have, through correlative analysis, demonstrated that out-of-season recreational activity can result in quantifiable disturbance:

⁹ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

¹⁰ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- Tuite et al¹¹ found that during periods of high recreational activity, bird numbers at Llangorse Lake decreased by 30% as the morning progressed, matching the increase in recreational activity towards midday. During periods of low recreational activity, however, no change in numbers was observed as the morning progressed. In addition, all species were found to spend less time in their 'preferred zones' (the areas of the lake used most in the absence of recreational activity) as recreational intensity increased.
- Underhill et al¹² counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
- Evans & Warrington¹³ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to observed greater recreational activity on surrounding water bodies at weekends relative to week days. However, recreational activity was not quantified in detail, nor were individual recreational activities evaluated separately.
- Tuite et al¹⁴ used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.

4.4.9 Human activity can affect birds either directly (e.g. through causing them to flee) or indirectly (e.g. through damaging their habitat). The most obvious direct effect is that of immediate mortality such as death by shooting, but human activity can also lead to behavioural changes (e.g. alterations in feeding behaviour, avoidance of certain areas *etc.*) and physiological changes (e.g. an increase in heart rate) that, although less noticeable, may ultimately result in major population-level effects by altering the balance between immigration/birth and emigration/death.¹⁵

4.4.10 The degree of impact that varying levels of noise will have on different species of bird is poorly understood except that a number of studies have found that an increase in traffic levels on roads does lead to a reduction in the bird abundance within adjacent hedgerows - Reijnen et al (1995) examined the distribution of 43 passerine species (i.e. 'songbirds'), of which 60% had a lower density closer to the roadside than further away. By controlling vehicle usage they also found that the density generally was lower along busier roads than quieter roads¹⁶.

¹¹ Tuite, C. H., Owen, M. & Paynter, D. 1983. Interaction between wildfowl and recreation at Llangorse Lake and Talybont Reservoir, South Wales. *Wildfowl* 34: 48-63

¹² Underhill, M.C. et al. 1993. *Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure.* Report to Thames Water Utilities Ltd. And English Nature. Wetlands Advisory Service, Slimbridge

¹³ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pitlake near London. *International Journal of Environmental Studies* 53: 167-182

¹⁴ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

¹⁵ Riley, J. 2003. Review of Recreational Disturbance Research on Selected Wildlife in Scotland. Scottish Natural Heritage.

¹⁶ Reijnen, R. et al. 1995. The effects of car traffic on breeding bird populations in woodland. III. Reduction of density in relation to the proximity of main roads. *Journal of Applied Ecology* 32: 187-202

- 4.4.11 Activity will often result in a flight response (flying, diving, swimming or running) from the animal that is being disturbed. This carries an energetic cost that requires a greater food intake. Research that has been conducted concerning the energetic cost to wildlife of disturbance indicates a significant negative effect.
- 4.4.12 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration. Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 4.4.13 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 4.4.14 The distance at which a species takes flight when approached by a disturbing stimulus is known as the 'tolerance distance' (also called the 'escape flight distance') and differs between species to the same stimulus and within a species to different stimuli. It is reasonable to assume from this that disturbance is unlikely to be experienced more than a few hundred metres from the birds in question. A disturbance study coordinated by Kent Wildlife Trust is currently underway in Pegwell Bay, one of the key components of the SPA, and will add greatly to our understanding of impacts on the birds using the Bay.

Visitor Assessment

- 4.4.15 According to data collated for the North East Kent European Marine Site Management Scheme the recreational activities that take place in the Dover parts of the SPA include dog-walking, quad-bikes and motorbikes in Pegwell Bay¹⁷ and that Pegwell Bay/Sandwich Bay are key areas for windsurfing and (to a smaller extent) kite surfing. In contrast, Pegwell Bay is not a core area for personal watercraft or conventional surfing (although the activity of personal watercraft is increasing, possibly due to improved management around the Thanet Coast which used to be a hotspot for this activity). In a study into turnstone disturbance which included Pegwell Bay in 2002¹⁸ dog walking, especially within the intertidal zone and particularly when the dog was off the lead actively chasing turnstones, was the main cause of disturbance to both feeding and roosting turnstones in the SPA. Sailing/wind—surfing in contrast rated low in terms of disturbance. Dog walking represented 44% of activity within the SPA.
- 4.4.16 Three surveys (Dover GI Survey, 2010¹⁹, Dover Visitors' Survey, 2011²⁰ and Dover Visitor Survey 2012²¹) have been undertaken which have aided greatly our understanding of the source of visitors to the Sandwich Bay/Thanet Coast area. The Dover Green Infrastructure Survey identified that 34% of Deal residents visit 'Deal beach'. For the purposes of this HRA, and given the close proximity of the

¹⁷ Pegwell Bay is one of the key areas where motorbike usage has increased and become a problem. Motor vehicles contributed to 9.7% of disturbance across all sites surveyed. Current initiatives being delivered under the auspices of the Management Scheme are increased reporting to the police and extra signage, while Thanet District Council are looking at developing an inland site for controlled use to draw bikes away from coastal areas.

¹⁸ Webb, K. 2002. The effects of human activity on turnstones and other wading birds within the Thanet and Sandwich Bay Special Protection Area (SPA)

¹⁹ Dover Green Infrastructure Survey, December 2010

²⁰ RMG: Clarity. May 2011. Dover Visitors' Survey

²¹ Strategic Marketing. April 2012. Dover Visitor's Survey: Pegwell Bay & Sandwich Bay

Deal frontage to the SPA/SAC it is taken that Deal beach includes at least part of the SAC/SPA.

4.4.17 The 2012 visitor survey indicates that in comparison only 13% of visitors to Pegwell Bay derive from Dover district. Sandwich Bay is therefore the most relevant part of the SPA for this assessment, with 79% of visitors deriving from Dover district, the majority (58% of total visitors) from either Deal or Sandwich. This is unsurprising since these are the two key population centres within 2km of Sandwich Bay. Sixty-six percent of visitors visit at least several times a week and almost half visit daily. Fifty-six percent of visitors to Sandwich Bay bring at least one dog; over 90% of those dog-owning visitors specifically come to Sandwich Bay to allow their dogs off the lead.

4.4.18 The breakdown of visitors to Sandwich Bay from Dover district is as follows:

- 34% of visitors to the SAC/SPA derive from Deal (including Sholden and Walmer)
- 28% derive from Sandwich (including Great Stonar)
- 5% derive from Worth
- 3% derive from Eastry
- 2% derive from Kingsdown
- 2% derive from Ash
- 2% derives from Dover town
- 1% derives from Betteshanger
- 1% derives from Shepherdswell
- 1% from St Margaret's Bay

4.4.19 Sandwich Bay therefore has a much more local catchment than originally assumed when the Core Strategy HRA was undertaken. The following settlements have sites identified in this Plan :

- Deal – ten sites including three strategic sites (PHS010, PHS009 and PHS013) and six smaller sites (PHS11 (DEA30, DEA29), MON01C, MON02C, MON04C, SAD31, NS01DEA)
- Sandwich – three sites including 1 strategic site (PHS17 & 18) and two smaller sites (SAN13 and SAN04)
- Woodnesborough – three smaller sites (SHL048, LDF03, SHL093)
- Ash – five smaller sites (SHL026, SAD24, SHL012, SHL011, LDF04)
- Eastry – five smaller sites (EAS02/SHL059, EAS05, SHL064, SHL025, NS02EAS)
- Kingsdown – three smaller sites (KIN03C, SAD28, LDF017)
- East Langdon – one smaller site (SHL035)
- St Margaret's at Cliffe – two smaller sites (NS03STM and STM03)
- Dover town – nineteen sites (LDF036, LDF030, SAD19A, SAD19B, LDF031, SAD19C, SAD19D, SAD19E, PP007, SHL037, LDF06, NS16DOV, SHL062, SHL070, SHL050, LDF08, LDF037, SHL079, NS08DOV)
- East Studdal – two small sites (LDF041 and NS03SUT)
- Capel-le-Ferne – three small sites (SHL060, LDF015, CAP03)
- Shepherdswell – three small sites (SHE04V, LDF018, NS01SHE)
- Eythorne/Elvington – three small sites (SHL063, SHL031, LDF01)
- Lydden – one site (SHL042)
- Nonington – two small sites (NS01NON, SHL015)
- Wingham – three small sites (SHL010, , WIN02C, WIN03)
- Staple – 1 small site (STA01C)

4.4.20 Based on the visitor origin data previously discussed, settlements of relevance to Thanet Coast & Sandwich Bay are: Deal, Sandwich, Eastry, Kingsdown, Shepherdswell and Dover town:

- Deal – the ten sites between them could accommodate approximately 780 new dwellings of which over 80% would be on the three strategic sites.
 - Sandwich – the three sites between them could accommodate approximately 230 new dwellings of which 100 (43%) would be on the strategic site.
 - Ash – The five sites between them could accommodate approximately 200 dwellings
 - Eastry – the six sites between them could accommodate approximately 67 new dwellings.
 - Kingsdown – the three sites between them could accommodate approximately 14 dwellings.
 - Shepherdswell – the three sites between them could accommodate approximately 31 dwellings.
 - Dover town – the eighteen sites between them could accommodate approximately 1,006 dwellings.
- 4.4.21 Visitor survey information can be used to calculate the approximate scale of increase in visitors expected to be experienced by development across three of these settlements (Deal, Sandwich and Dover town).
- 4.4.22 It is important to note that the demographic assumptions that are included in this HRA have been based on the precautionary approach. It has assumed that all the land allocated for housing development will be for entirely new residents and takes no account of the fact that a proportion of the new housing will be required to cater for the needs of the existing population.
- 4.4.23 It should be noted that in calculating the number of dwellings required over the Plan period, the figures in the Core Strategy (paragraph 3.31) have been discounted by the Council to take account of:
- Completions from 2006-2012; and
 - Unimplemented commitments as at 31st March 2012.

Sandwich Bay

- 4.4.24 For Deal:
- 34% of Deal residents visit 'Deal beach'
 - Deal has a current population of 30,420
 - So, approximately 10,343 Deal residents currently visit Deal beach/Sandwich Bay (0.34x30,420)
 - There are 780 new dwellings planned for Deal under this Plan.
 - Using a multiplier of 2.35 residents per dwelling (the most precautionary new build occupancy rate for Dover district according to data available from Kent County Council), that means approximately 1,833 new residents (this assumes that the current occupancy rate will continue to be as high as in the past and also that the occupants of the new housing will all be newcomers to Deal, both of which are unlikely in reality)²²

²² To illustrate how precautionary this assessment is, demographic forecasting for Deal (which does not rely on multiplying the number of new dwellings by a dwelling occupancy rate but factors in a calculation of the proportion of new dwellings that are predicted to be occupied by the existing Deal population) calculates a net population change of just 90 individuals at Deal between 2011 and 2031, on the basis that the vast majority of the new housing provided is predicted under that forecasting to be occupied by the existing population, rather than new arrivals. In addition, the same forecasting predicts that average occupancy will fall from 2.23 residents per dwelling to 1.99 residents per dwelling by 2031.

- Assuming that 34% of Deal residents will continue to visit Sandwich Bay, 623 of the new residents will visit Sandwich Bay ($0.34 \times 1,833$) increasing the overall number of Deal residents visiting Sandwich Bay by 6% ($(623/10,343) \times 100$)
- The visitors arising from Deal and Walmer make up approximately 34% of all visitors to Sandwich Bay
- Therefore, a 6% increase in Deal-based visitors means a 2% increase in visitors overall (0.06×34). This assumes that the relative balance between the various visitor origins remains the same as current and is very precautionary as it assumes a 'worst case scenario' of all dwellings being occupied by new arrivals rather than existing Deal residents.

4.4.25 Doing the same calculations for Sandwich:

- 35% of Sandwich residents visit Sandwich Bay
- Sandwich has a current population of 6,620
- So, approximately 2,317 Sandwich residents currently visit Sandwich Bay ($0.35 \times 6,620$)
- There are 230 new dwellings planned for Sandwich.
- Using a multiplier of 2.35 residents per dwelling (the current typical occupancy), that means approximately 541 new residents (this assumes that the current occupancy rate will continue to be as high as in the past and also that the occupants of the new housing will all be newcomers to Sandwich, both of which are unlikely in reality)²³
- Assuming that 35% of Sandwich residents will continue to visit Sandwich Bay, 189 of the new residents will visit Sandwich Bay (0.35×541) increasing the overall number of Sandwich residents visiting Sandwich Bay by 8% ($(189/2317) \times 100$)
- The visitors arising from Sandwich make up approximately 28% of all visitors to Sandwich Bay
- Therefore, an 8% increase in Sandwich-based visitors means a 2% increase in visitors overall (0.08×28). This assumes that the relative balance between the various visitor origins remains the same as current.

4.4.26 Doing the same calculations for Dover town:

- According to the Dover Green Infrastructure [usage] Study, 4% of 'Dover town' residents visit Deal beach²⁴
- Dover town²⁵ has a current population of 33,360
- So, approximately 1,334 Dover residents currently visit Deal beach/Sandwich Bay ($0.04 \times 33,360$)
- There are 1,006 new dwellings planned for Dover town.

²³ As with Deal, this is a very precautionary 'worst case scenario' analysis. Demographic forecasting predicts that the population of Sandwich will increase by only 380 (net) individuals between 2011 and 2031, for similar reasons.

²⁴ For the GI Survey 'Dover town' excludes Whitfield, which is identified separately and from which no residents surveyed identified Deal beach as an area they used for recreation

²⁵ For the purposes of this assessment 'Dover town' is defined as all wards in the Dover Urban Area excluding Whitfield, St Margaret's and Lydden & Temple Ewell which are reported as separate settlements in the Dover visitor or GI surveys and the Land Allocations Plan

- Using a multiplier of 2.35 residents per dwelling that means approximately 2,364 new residents²⁶
- Assuming that 4% of Dover town residents will continue to visit Deal beach, 95 of the new residents will visit Deal beach (0.04x2,364) increasing the overall number of Dover town residents visiting Deal beach by 7% ((95/1,334) x 100)
- The visitors arising from Dover town make up approximately 2% of all visitors to Sandwich Bay
- Therefore, a 7% increase in Dover town-based visitors means a 0.1% increase in visitors overall (0.07x2). This assumes that the relative balance between the various visitor origins remains the same as current.

4.4.27 Survey data regarding the percentage of residents of Kingsdown, St Margaret's, Shepherdswell and Eastry that visit Sandwich Bay are not available so a similar calculation cannot be performed for those settlements. However, they will receive approximately 120 additional dwellings. Using a worst case occupancy of 2.35 residents per dwelling²⁷ this equates to 282 residents. The current population of Kingsdown, Shepherdswell, St Margaret's and Eastry is approximately 8,400 according to data supplied by Dover District Council. This will therefore mean an approximately 3% increase in residents. Approximately 7% of visitors to Sandwich Bay derive from these four settlements so the additional residents would increase this by a further 0.2%. That assumes that all the new residents will visit the SPA which in actuality is unlikely.

4.4.28 As with Kingsdown, St Margaret's, Shepherdswell and Eastry survey data regarding the percentage of residents of Ash that visit Sandwich Bay are also unavailable. However, 201 dwellings are proposed. Using a worst case occupancy of 2.35 residents per dwelling this equates to 472 residents. The current population of Ash is 3,240. This will therefore mean an approximately 15% increase in residents. Two percent of visitors to Sandwich Bay derive from Ash so the additional residents would increase this by a further 0.3%. That assumes that all the new residents will visit the SPA which in actuality is unlikely.

4.4.29 The housing levels set out in this Plan, when considered cumulatively, can therefore be expected to lead to an approximately 5% increase in visitors to Sandwich Bay.. This is likely to be a precautionary analysis since it does assume that visitors to 'Deal beach' will probably carry on up to Sandwich Bay. Inevitably, the strategic settlements at Deal (sites PHS010, PHS009 and PHS013) and Sandwich (PHS17&18) will make a large contribution to this overall impact since they will be responsible for approximately 47% of all housing identified in this Plan and Deal and Sandwich are between them are responsible for 58% of all visitors to Sandwich Bay.

Pegwell Bay

4.4.30 The breakdown of visitors to Pegwell Bay from Dover district is as follows:

- 6% of visitors to Pegwell Bay derive from Deal (including Sholden)
- 3% derives from Dover town

²⁶ Demographic predictions calculate a population increase at Dover town (as defined in the preceding footnote) of approximately 2,250 people, which broadly matches the figure derived by multiplying the number of new dwellings by 2.35.

²⁷ According to demographic forecasting undertaken by Kent County Council for Dover District Council a figure of 3.35 conforms with research findings (such as the County Council's New Build Survey in 2005) that 'new build' dwellings have higher average household sizes than the existing dwelling stock. A figure of 2.35 is the highest average household size contained within predictions for future demographic population changes in Dover district and therefore represents a suitable worst case scenario for this analysis.

- 2% derive from Sandwich (including Great Stonar)
- 1% derive from Eastry
- 1% derive from Ash

4.4.31 For Deal:

- According to the Dover Visitors Survey 2% or less of Deal residents visit Pegwell Bay (as opposed to Sandwich Bay)
- Deal has a current population of 30,420
- So, up to 608 Deal residents currently visit Pegwell Bay ($0.02 \times 30,420$)
- There are 780 new dwellings planned for Deal under this Plan.
- Using a multiplier of 2.35 residents per dwelling (the current typical occupancy), that means approximately 1,833 new residents (this assumes that the current occupancy rate will continue to be as high as in the past and also that the occupants of the new housing will all be newcomers to Deal, both of which are unlikely in reality)
- Assuming that up to 2% of Deal residents will continue to visit Pegwell Bay, 43 of the new residents will visit Pegwell Bay ($0.02 \times 1,833$) increasing the overall number of Deal residents visiting Pegwell Bay by 6% ($(37/608) \times 100$)
- The visitors arising from Deal make up approximately 6% of all visitors to Sandwich Bay
- Therefore, a 6% increase in Deal-based visitors means a 0.4% increase in visitors overall (0.06×6). This assumes that the relative balance between the various visitor origins remains the same as current.

4.4.32 Doing the same calculations for Sandwich:

- According to the Dover Visitors Survey approximately 12% of Sandwich residents visit Pegwell Bay
- Sandwich has a current population of 6,620
- So, approximately 794 Sandwich residents currently visit Pegwell Bay ($0.12 \times 6,620$)
- There are 230 new dwellings planned for Sandwich.
- Using a multiplier of 2.35 residents per dwelling (the current typical occupancy), that means approximately 541 new residents (this assumes that the current occupancy rate will continue to be as high as in the past and also that the occupants of the new housing will all be newcomers to Sandwich, both of which are unlikely in reality)
- Assuming that 12% of Sandwich residents will continue to visit Pegwell Bay, 65 of the new residents will visit Sandwich Bay (0.12×541) increasing the overall number of Sandwich residents visiting Sandwich Bay by 8% ($(65/794) \times 100$)
- The visitors arising from Sandwich make up approximately 2% of all visitors to Sandwich Bay
- Therefore, an 8% increase in Sandwich-based visitors means a 0.2% increase in visitors overall (0.08×2). This assumes that the relative balance between the various visitor origins remains the same as current.

- 4.4.33 It is not necessary to repeat the calculations for Dover, Eastry and Ash to identify that the level of development set out in this Plan will result in an approximately 1% increase in visitors to Pegwell Bay.

Summary

- 4.4.34 The housing levels set out in this Plan, when considered cumulatively, can therefore be expected to lead to an approximately 5% increase in visitors to Sandwich Bay and a 1% increase in visitors to Pegwell Bay; a 6% increase in visitors to the SPA overall.

4.5 Other plans and projects

- 4.5.1 As well as the development set out in this Plan, other housing is intended for delivery within the catchment of the SPA:

- A small quantum of housing to be delivered at Worth (which is responsible for 5% of visitors to Sandwich Bay) under a forthcoming Neighbourhood Plan. Until that document is fixed the level of development cannot be confirmed, but there will clearly be an 'in combination' effect. This will need to be assessed as part of the HRA for the Neighbourhood Plan;
- Housing to be delivered in Dover town as strategic allocations (Dover Waterfront, Dover Mid-Town and Connaught Barracks)²⁸ which between them will deliver approximately 900 dwellings. This will effectively double the contribution of Dover town to any recreation at Sandwich Bay from 0.1% to 0.2%;
- Housing in Thanet district: Ramsgate is responsible for approximately 35% of visitors to Pegwell Bay, while Cliffsend is responsible for approximately 10%, Broadstairs for 9%, Margate for 7% and Minster for 3%. Under the Preferred Options (2010) there were 7,500 dwellings proposed for delivery across the District under the Thanet Core Strategy, most of which are likely to be located in Ramsgate, Broadstairs or Margate. This housing is identified in the Preferred Options document as being associated with a population increase of 6,000 people (5%). If one applies the precautionary approach taken with regard to Dover (i.e. allowing for all new housing to be occupied by new residents using a multiplier of 2.35/dwelling) then this would be considerably higher (c 17,625 i.e. 14%²⁹). Fifty one percent of visitors to Pegwell Bay derive from Ramsgate, Margate or Broadstairs so a 5 - 14% increase in residents could increase this by 3 - 7%. This is based on the assumption that Thanet Council continued with the housing levels set out in their Preferred Options.
- Ramsgate is also responsible for 5% visitors to Sandwich Bay. A 5-14% increase in the population of urban Thanet would therefore mean an increase of 0.3 – 0.7%, depending upon where the housing was to be located.

- 4.5.2 In the cases of Ramsgate, Margate and Broadstairs the calculation is cruder than for Deal, Sandwich and Dover town since it is not possible to weight it on the basis of the proportion of new residents who can be expected to visit Pegwell Bay – instead it must be assumed that all new residents will visit the Bay.

²⁸ Whitfield is not included in this particular instance because the Dover GI Survey did not identify that any current residents of Whitfield utilised Deal beach, Sandwich Bay or Pegwell Bay and both the 2011 and 2012 visitor surveys failed to identify any visitors to Sandwich Bay or Pegwell Bay who gave their home town/village as Whitfield.

²⁹ According to the Thanet Preferred Options Core Strategy the population of the district in 2006 was 128,600

4.5.3 Summing the increase in visitors that can be expected from Dover district, and Thanet results in an overall 'in combination' increase in visitors of approximately 9- 13% over the period until 2031. Unlike Dover to Kingsdown Cliffs SAC, the vast majority of visitors to Thanet Coast & Sandwich Bay SAC are locals and the SPA supports populations of sensitive waterfowl which are already known to be subject to recreational disturbance.

4.6 Thanet Coast SPA Mitigation Strategy

4.6.1 The issue of potential impacts from new housing across Dover District on the SPA was first identified in the Dover District Core Strategy HRA. Since that time Dover District Council has been working with developers to devise a strategic mitigation strategy for the recreational pressure of new housing on the SPA. This will be the principal tool through which impacts on the SPA are controlled and avoided. They can also be applied to Sandwich Bay SAC where it is necessary to do so. Any future housing delivered in Deal will need to input to the Thanet Coast SPA Mitigation Strategy (May 2011) devised by Dover District Council in consultation with Natural England and other stakeholders.

4.6.2 It is fundamental that the purpose of a development mitigation strategy is to avoid potential impacts brought about by demographic changes, rather than ameliorate pre-existing impacts. However, a strategy that may have coincidental effects on existing impacts would produce an overall benefit. Wardening, for instance, should, by its very nature, reduce existing as well as new impacts.

4.6.3 The mitigation strategy was initially proposed by developers and has evolved over several months in discussions with Natural England. It has further been refined in the light of the surveys and ongoing discussions and comprises four elements:

1. The ability, if necessary, to draw on funding, via a bond, to support wardening at Sandwich Bay for a period up to 10 years.
2. Monitoring of potential impacts associated with Dover development to identify if and when such wardening (1) or other mitigation (4) is required;
3. Contribution to the Pegwell Bay and Sandwich Bay Disturbance Study to complement (2), provide weighting for different forms of disturbance and thus direct the role of wardening (1).
4. To use the monitoring (2) to identify lesser sources of development-related disturbance and to draw on the relevant developers contributions for mitigation of such.

4.6.4 The Strategy is to be applied to all development within Dover district of more than 15 units and the developer contribution is calculated as a 'cost per dwelling' based upon the number of bedrooms in that dwelling. The full May 2011 Mitigation Strategy is appended to this HRA for information as Appendix 1.

4.6.5 The financial contributions to this Mitigation Strategy will address the cumulative 'in combination' impact of the smaller sites allocated for development in this Plan as well as at least part of the impact from the larger sites (Urban Expansion Areas). There are three Urban Extension Areas in Deal (PHS009 – Land between Deal and Sholden, PHS010 – Land at Sholden New Road, PHS013 – Station Road, Walmer) and one in Sandwich (PHS 17 & 18 – Land at St Barts Road). Two of the urban extensions (PHS009 and PHS010) have a resolution to grant planning permission and have undertaken project-level HRA which has led to additional site specific mitigation measures (above and beyond a contribution to the strategic Mitigation Strategy) being identified. The two sites that do not have a resolution to grant planning permission will have to undertake project-level HRA,

notwithstanding the requirement to contribute to the strategic Mitigation Strategy³⁰. Depending upon the details of the development proposals (which are unknown at this point), these may identify the requirement for financial contributions to the strategic Mitigation Strategy to be accompanied by additional site-specific measures.

- 4.6.6 Such measures cannot be set out in detail in this HRA as they will need to be devised specifically for each site as development proposals are devised, but could include combinations of a) on site alternative greenspace, b) additional contributions to access management beyond that set out in the strategic Mitigation Strategy, for example to deliver additional wardening, c) provision of information to new occupants directing them to less sensitive areas or d) rerouting of footpaths where appropriate to direct visitors away from the SPA.
- 4.6.7 This HRA does not set out the mitigation to be delivered by Thanet district for their contribution to the overall 'in combination' effect. However, under their duty to co-operate, the East Kent local authorities are working towards a joint approach to in-combination mitigation.
- 4.6.8 The four strategic allocations in Dover (Whitfield Urban Extension, Connaught Barracks, Dover Mid-Town and Dover Waterfront) are not part of this Plan and will be/have been subject to specific HRA as part of the development of specific SPD's. They are only covered in this document to enable the cumulative context for this Plan to be provided.

4.7 Overall Conclusion

- 4.7.1 It is considered that, due to the existence of the Thanet Coast SPA Mitigation Strategy and the requirement for all new dwellings to contribute to that Strategy to deliver enhanced management of the SPA, the scale of development set out in this Plan will not lead to an adverse effect on the integrity of Thanet Coast & Sandwich Bay SPA, either alone or in combination with other projects and plans. This is particularly the case since a highly precautionary assessment has been undertaken, both with regard to the typical occupancy rate (2.35) and with regard to development in Deal which, if demographic forecasting proves to be accurate, will actually result in a negligible population change by 2031. The Council should however ensure that the two Urban Expansion Areas at Deal and Sandwich (site PHS013 and PHS17&18) undertake project-level HRA similar to that done for the other Urban Expansion Areas (PHS009 and PHS010) in order to confirm any site specific details of the planning applications that may trigger a requirement for additional measures.

³⁰ The two largest Deal sites, PHS009 (Land to the North of Middle Deal) and PHS010 (Land Adjacent to London Road and Sholden New Road), already have resolutions to grant planning permission and both developments have included consideration of impacts on the SPA in their project-level HRA work. They therefore do not require further detailed consideration in this report.

5 Thanet Coast & Sandwich Bay Ramsar site

5.1.1 Thanet Coast & Sandwich Bay is designated as a Ramsar site (a wetland of international importance under the Ramsar Convention) for its population of turnstone and also for supporting 15 British Red Data Book wetland invertebrates, primarily at Hacklinge Marshes in Dover district.

5.2 Condition Assessment

5.2.1 During the most recent condition assessment (completed in July 2009), Natural England judged 61% of the principal constituent SSSI of the Thanet Coast and Sandwich Bay (Sandwich Bay to Hacklinge Marshes SSSI) to be in favourable condition. Parts of the site were unfavourable, largely through issues related to inappropriate grazing, choking of waterways and some levels of eutrophication.

5.3 Key Environmental Conditions

5.3.1 The following key environmental conditions were identified for all the sites:

- Sufficient space between the site and development to allow for managed retreat of intertidal habitats and avoid coastal squeeze;
- No dredging or land-claim of coastal habitats;
- Unpolluted water;
- Absence of nutrient enrichment;
- Absence of non-native species;
- Maintenance of freshwater inputs;
- Balance of saline and non-saline conditions;
- Minimal disturbance; and
- Minimal activities that alter sediment characteristics.

5.4 Assessment

Recreational pressure/disturbance

5.4.2 Those parts of the Thanet Coast & Sandwich Bay Ramsar site that are coincident with the Special Protection Area have effectively already been assessed in the preceding Chapter. There is however a large area of Ramsar site (primarily consisting of grazing marsh and associated habitats in the Lydden Valley, much of it managed by the RSPB) that is not covered by SPA or SAC designation. Most of this area lies over 2km from Sandwich and Deal. However, one area in particular – an area of land at Sholden close to Fowlmead County Park – lies within 500m of site PHS009 (Land to the North of Middle Deal) and site PHS010 (Land Adjacent to London Road and Sholden New Road), which are identified to receive approximately 460 dwellings between them. However, both these sites already have resolutions to grant planning permission and both developments have included consideration of impacts on the Ramsar site in their application

- 5.4.3 A visitor survey of the Ramsar site was undertaken by Keystone Environmental for Ward Homes to support their planning application for site PHS010. It is reported as Appendix 7.11 to the Environmental Statement of the planning application (application numbers DOV/10/01012 and DOV/10/01065). This visitor survey identified that almost 80% of visitors using the paths were dog-walkers and over 80% visited the area because it was the closest such area to their home. However, the survey also identified that usage of the Ramsar site (outside the SPA) is very low, with an average of 3.4 visitors recorded per day. Moreover, the visitor survey was timed to coincide with the probable peak time of year and times of day that people would utilise the footpaths/bridal ways and so this average is likely to be a worst-case scenario and be considerably lower at other times of the day and year. The total development in Deal under the Plan t would result in 780 new dwellings which would indicate a total increase in the Deal population of approximately 6% ((1,833/30,420) x100). This depends upon the precautionary assumptions that dwelling occupancy will be approximately 2.35 residents/dwelling, and that all the new dwellings will be occupied by incomers to Deal. In reality this is probably a significant overestimate for the reasons previously discussed for the SPA.
- 5.4.4 If one makes the simplistic assumption that a 6% increase in the population of Deal would result in a similar increase in the average visitor pressure on the Ramsar site, then this would increase from a peak-time average of 3.4 visitors per day to a peak-time average of 3.6 visitors per day. In reality, visitor numbers are so low that an increase of less than 1 visitor per day is unlikely to result in a greater disturbance risk than current numbers. Moreover, there is no direct access straight into the Ramsar site from the development locations currently being considered, which will also act to control recreational pressure.

Loss of supporting habitat

- 5.4.5 Natural England have identified³¹ that there are numerous areas of undesignated grazing marsh which is being delivered by Natural England in conjunction with landowners to the north of Deal through Higher Level Stewardship (HLS) and Entry Level Stewardship (ELS) schemes. These areas are outside the SPA/Ramsar site boundaries but relate to the wellbeing of the designated sites. These areas are depicted on the Nature on the Map website (www.natureonthemap.co.uk) as yellow or dark green polygons.
- 5.4.6 From scrutiny of Figures 3 and 4 that most of the sites being considered for allocation in the Plan are not located on any areas of HLS/ELS grazing marsh.
- 5.4.7 However, two sites (PHS013, Land between 55 and 77 Station Road, Walmer and PHS09, Land to the North of Middle Deal) are located on areas of 'Entry Level plus Higher Level Stewardship' farmland, while two further sites (MON04C and SAD31) are located on areas of Entry Level Stewardship farmland.
- 5.4.8 As part of the development proposals for these three sites therefore, it is recommended that an appropriate alternative area of farmland is brought into Stewardship to ensure no net loss of Stewardship land.

³¹ Email from John Lister (Natural England) to Elizabeth Rix (Dover District Council) 20/09/11

5.5 Overall Conclusion

- 5.5.1 It is considered that the scale of development set out in this Plan will not lead to an adverse effect on the integrity of Thanet Coast & Sandwich Bay Ramsar site, either alone or in combination with other projects and plans. Development proposals for sites PHS013 (Land between 55 and 77 Station Road, Walmer), PHS09 (Land to the North of Middle Deal), MON04C (Mongeham Farm, Mongeham Road, Great Mongeham) and SAD31 (Land to the rear of 133-147, St Richards Road, Deal) are located on areas of Entry or Higher Level Stewardship farmland. As part of the development proposals for these sites therefore, it is recommended that an appropriate alternative area of farmland is brought into Stewardship to ensure no net loss of Stewardship land.

6 Dover to Kingsdown Cliffs SAC

6.1 Introduction

6.1.1 This long narrow site covers a large stretch of the south east Dover coast between the towns of Dover and Kingsdown. It support a full zonation of maritime cliff communities found on chalk substrates, reflecting different levels of exposure to wind and salt spray. The most exposed, lowest parts of the cliff face support rock-crevice communities with rock samphire *Crithmum maritimum*, rock sea-lavender *Limonium binervosum* and thrift *Armeria maritima*, with the rare hoary stock *Matthiola incana* in places. On more sheltered slopes there is a community restricted to south-facing chalk cliffs characterised by wild cabbage *Brassica oleracea*. There are good paramaritime grassland transitions to chalk grassland. The endangered oxtongue broomrape *Orobanche artemisiae-campestris*, confined in the UK to unstable coastal chalk cliffs of southern England, has a stronghold on this site. The cliffs are internationally important as a stratigraphic reference site for chalk cliff exposures.

6.2 Features of European Interest

6.2.1 The site is designated as a Special Area of Conservation for its:

- Calcareous grassland - dry grasslands and scrublands on chalk or limestone including important orchid sites.
- Vegetated sea cliffs

6.3 Baseline conditions

Natural England condition assessment

6.3.2 During the most recent condition assessment process (which finished in June 2009), 54% of Dover to Kingsdown Cliffs SSSI was judged to be in favourable condition. Most of the unfavourable areas were designated so because of inadequate or inappropriate grazing.

Recreational usage of the site

6.3.3 The most accessible part of the Dover to Kingsdown Cliffs SAC is owned by the National Trust constituting their 'White Cliffs of Dover' estate. The estate as a whole attracts more than 220,000 visitors (visits) per year (latest data provided by The National Trust reports that the site attracted 241,174 visits in the year from March 2009 – February 2010, as well as 70,214 vehicles)³².

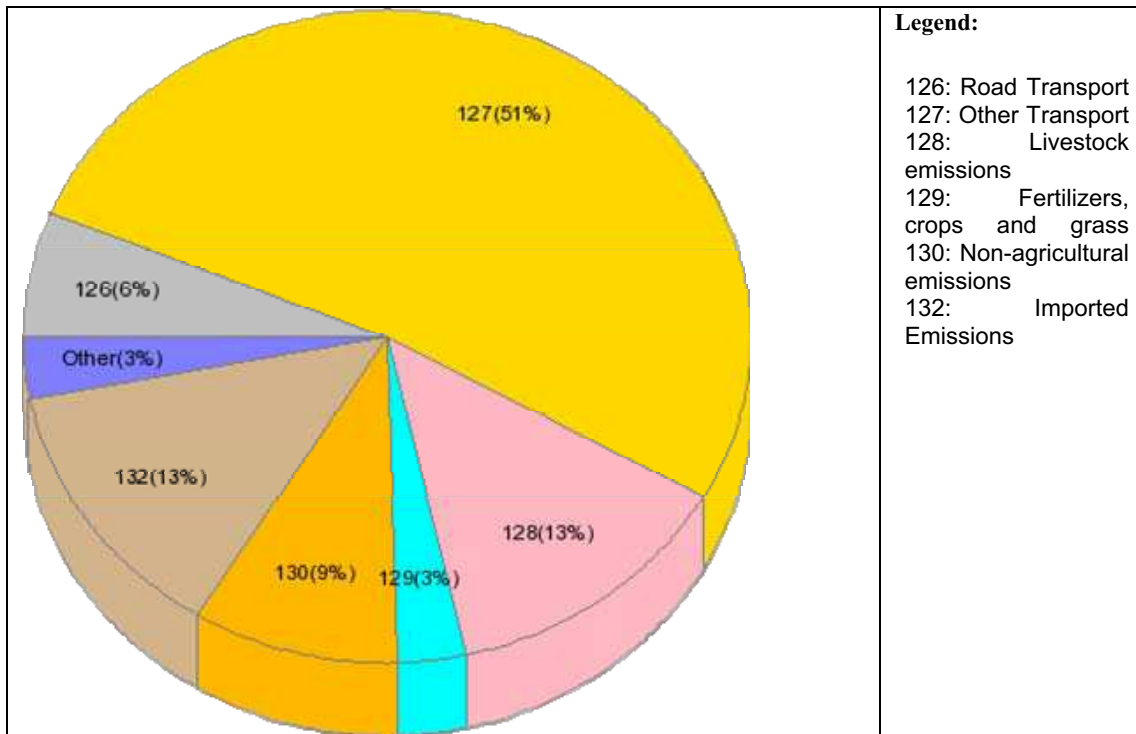
6.3.4 Access is well-managed (although there are occasional incidents of damage due to fire and the most recent Natural England condition assessment identifies that the area to the east of the visitor centre is very species poor mesotrophic grassland, due potentially to management difficulties associated with localised high visitor pressure) despite the high number of visitors the estate as a whole receives. The vegetated sea cliffs are generally dangerous to approach or physically inaccessible and are therefore inherently protected from recreational

³² Pam Clegg, The National Trust, personal communication to James Riley (Scott Wilson) 19/08/10

pressure. The cliff-top grasslands are crossed by numerous footpaths which are used by recreational walkers.

Air quality

6.3.5 The SAC is currently subject to nitrogen deposition considerably greater than the critical load; according to APIS³³ deposition is 23.9 kgN/ha/yr compared to a critical load of 15 kgN/ha/yr – by far the single largest contributor to nitrogen deposited on the site (51% of total deposition) derives from non-road transport i.e. shipping.



6.4 Key Environmental Conditions

6.4.1 The key environmental conditions that support the features of European interest are:

- Maintenance of grazing
- Low levels of trampling
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification
- Adequate undeveloped land behind the cliffs to enable managed retreat of the SAC in response to erosion and avoid coastal squeeze
- Absence of direct fertilisation; and
- Well-drained soils.

³³ Accessed 17/08/10

6.5 Assessment

Recreational pressure

6.5.2 Gareth Wiltshire at The National Trust has analysed the existing data they have for the 2011/2012 season's visitors. This indicates that 17% of visitors to The National Trust estate described themselves as 'living locally'. The term 'local' is not defined but the Dover Visitor Survey included a postal survey of season ticket holders to The National Trust estate at Dover to Kingsdown Cliffs. That indicated that 86% of the season ticket holders came from Dover district:

- 78% of visitors from the Dover Urban Area (excluding St Margaret's at Cliffe)
- 4% from St Margaret's at Cliffe
- 4% from Deal

6.5.3 While the sample size for this survey was small, the survey is likely to reflect the distribution of 'local visitors' generally and does tell us the relative importance (as expected) of the Dover Urban Area relative to other locations within Dover district. It is therefore reasonable to conclude that most of those people who described themselves as 'locals' were from the Dover Urban Area and to focus attention on that location.

6.5.4 The fact that 82% of local visitors come from the Dover Urban Area can be used to calculate that roughly 14% of all visitors (including tourists) to Dover to Kingsdown Cliffs SAC derive from the Dover Urban Area ($0.82 \times 17 = 14$). The Dover Green Infrastructure Survey 2010 identified that approximately 10% of Dover town residents and 13% of Whitfield residents visit the Dover Cliffs/White Cliffs. This can be used to obtain a rough average of 12% of Dover Urban Area residents that visit the White Cliffs/Dover Cliffs. The following calculation can therefore be undertaken:

- Approximately 12% of Dover Urban Area residents visit the White Cliffs
- The Dover Urban Area (including St Margaret's) has a current population of 45,970
- So, approximately 5,516 Dover residents currently visit the White Cliffs ($0.12 \times 45,970$)
- There are 1,006 new dwellings planned for the Dover Urban Area in this Plan. If WUE (5,750 new homes), Dover Waterfront (300 new homes), Dover Mid-Town (100 new homes) and Connaught Barracks (500 new homes) are included it is important to consider the 'in combination' effect even though those strategic sites are not part of this Plan - that brings the total to 7,656 dwellings.
- Using a multiplier of 2.35 residents per dwelling, that means approximately 17,992 new residents will be associated with this new housing (this is precautionary since it assumes that the current occupancy rate will continue to be as high as in the past and also that the occupants of the new housing will all be newcomers to the Dover Urban Area, both of which are very unlikely in reality)³⁴
- Assuming that 12% of Dover Urban Area residents will continue to visit the White Cliffs, this means 2,159 new residents ($0.12 \times 17,992$) increasing the

³⁴ This is a precautionary analysis. Demographic forecasting undertaken by Kent County Council predicts that the population of Dover Urban Area will actually increase by 15,850 people between 2011 and 2031.

overall number of Dover Urban Area residents visiting the White Cliffs by 39%
 $((2,159/5,516) \times 100)$

- Dover Urban Area residents are estimated to make up roughly 14% of all visitors to the White Cliffs (the main Dover-based group of visitors by a considerable margin)
- Therefore, a 39% increase in Dover Urban Area-based visitors would mean a 5% increase in visitors overall (0.39×14 , rounded to the nearest whole percent), if the number of visitors from other sources e.g. tourists remained static. In practice the number of tourists may increase but the small relative contribution made by Dover Urban Area residents is clear.

6.5.5 Not all of these visitors will go beyond the visitor centre and the managed surrounds. Less than 1% of the increase in visitors would be attributable to the sites identified in this Plan³⁵.

6.5.6 It is considered that this percentage is such that it would be lost among normal variation and the impact of such an increase on the sward within the site would be undetectable. Given that the SAC does not support any easily disturbed wintering bird interest either (unlike Thanet Coast to Sandwich Bay SPA) the contribution of development in Dover district to any 'in combination' increase in visitors to the SAC over the build-out period will therefore be effectively inconsequential. Since visitors to this site are dominated by tourists and non-locals (approximately 83% of all visitors) any requirement to introduce altered management in the future would be part of general long-term site management requirements associated with any site that is a major tourist draw, rather than an adverse effect attributable to the delivery of local housing.

Air quality

6.5.7 For the purposes of the Land Allocations HRA URS transport modellers determined the typical daily trip generation for the total number of proposed dwellings that could be delivered on the Land Allocations sites. Having applied the trip generation rate to each of the Land Allocations sites, the trips were then distributed using Census 2001 'Journey to Work' data. This involves professional judgment over the most probable ways in which residents might travel to and from the Land Allocations sites. On completion of the analysis, it was estimated that approximately 1,300 additional vehicles (AADT) will pass national grid reference point 633036,142303, which lies within 200m of Dover to Kingsdown Cliffs SAC period. This must then be placed within the context of the background growth that can be expected over the LDF period and growth attributable to growth of the Port of Dover and the strategic allocations set out in the Dover Core Strategy.

6.5.8 In order to obtain these contextual data, WSP scrutinised their Dover Transport Model. In the first instance, a reference case was considered for 2031. This used observed traffic data from 2007 as well as the Highways Agency's TRADS database to convert AM and PM peak hour flows into estimated AADT values. The reference case assumed fixed growth based on TEMPRO and NTM up to 2021, then added traffic associated with Port of Dover growth and Terminal 2 (T2) expansion as well as growth associated with the Core Strategy strategic allocations (Whitfield Urban Extension, Dover Waterfront, Dover Mid-Town and Connaught Barracks). Taking all this development into account gave a 2031 reference case AADT at Jubilee Way of 34,800 vehicles. Adding the development

³⁵ This Plan is responsible for 13% $((1,006/7,656) \times 100 = 13)$ of all housing/residents to be delivered; $2,159 \times 0.13 = 281$; $(281/5,516) \times 100 = 5\%$; $0.05 \times 14 = 0.7\%$

set out in the Plan would increase these flows to 36,160. In other words, flows on Jubilee Way within 200m of Dover to Kingsdown Cliffs could be expected to increase by approximately 4% as a result of the development set out in the Plan .

6.5.9 The vast majority of the SAC (99.8%) lies more than 200m from the A2, and will experience no increase in deposition due to local road traffic. Although 0.2% of the SAC lies within 200m of Jubilee Way this does not take account of topography. For most of this stretch Jubilee Way lies at a lower elevation than the SAC which will reduce the distance over which elevated NOx levels due to exhaust emissions will be experienced. As such, although 0.2% of the SAC lies within 200m of Jubilee Way, it is probable that less than 0.2% is actually exposed to elevated NOx concentrations due to road traffic.

6.5.10 Moreover, while there will be an increase in traffic on the A2 'in combination' and thus a small increase in total deposition, the contribution of road transport to deposition on the SAC is so small (6% from all road sources, compared to 51% derived from shipping) that even a large reduction in emissions from traffic on the A2 could only result in a minor reduction in total deposition within the SAC. It would therefore be entirely disproportionate to impose stringent controls on new housing. This is in line with guidance and practice regarding air quality and minor emitters:

6.5.11 *'Where a new installation would only make a minor contribution to a breach, it will normally be more desirable for Regulators (and local authorities, where relevant) to consider controls on other major sources of pollution rather than imposing excessive costs or refusing a Permit '.*

6.5.12 While this relates to permits for point source emitters (since general dispersed sources such as traffic are not within the Agency's permitting remit) the fact that it is considered a reasonable approach to take for major point source emitters such as power stations renders it a logical stance to take for minor emitters such as new housing.

6.6 Dover Transport Strategy

6.6.1 The Dover Transport Strategy (June 2008) sets out its strategic approach to improving transport and air quality in the district. At the time of preparing the Strategy these measures included:

- A strategic and dynamic routing strategy for Port traffic
- Longer term proposals for diversion of A2
- Downgrade old A2
- Improved access to Dover Priory Station and CTRL services
- A car parking strategy to manage the demand for town centre car trips
- Park and Ride at Whitfield and A20 approach
- Improved one-way system
- Bus only Pencester Road
- New express bus services
- Coordinated traffic signal control
- Improved accessibility for pedestrians and cyclists, including major new Townwall Street crossing
- A strong transport awareness and behavioural change programme

6.6.2 It is considered that the sustainable transport initiatives detailed above will provide sufficient mitigation for the very small contribution that development set out in the Plan would make to increased nitrogen deposition on a small part of Dover to

Kingsdown Cliffs SAC (approximately 3%). This does not preclude larger sites (50 dwellings upwards) undertaking site-specific HRA if greater site-specific details cause this analysis to change.

- 6.6.3 Also, development of Phase 1 at Whitfield is conditional upon air quality surveys of Jubilee Way to provide 'ground truthing' for the analysis.

6.7 Overall Conclusion

- 6.7.1 It is considered that scale of development set out in the Plan will not lead to an adverse effect on the integrity of Dover to Kingsdown Cliffs SAC.

7 Lydden and Temple Ewell Downs SAC

7.1 Introduction

7.1.1 This SAC includes some of the richest chalk grassland in Kent, with outstanding assemblages of plants and invertebrates. A number of rarities include the early spider orchid *Ophrys sphegodes*, burnt orchid *Orchis ustulata*, musk orchid *Herminium monorchis*, and slender bedstraw *Galium pumilum*. An outstanding invertebrate fauna includes typical downland butterflies such as the marbled white *Melanargia galathea*, adonis blue *Lysandra bellargus*, chalkhill blue *L. coridon*, and the rare silver-spotted skipper *Hesperia comma*. Two rare moths, the dew *Setina irrorella* and the straw belle *Aspitates gilvaria* are present as is the rare carthusian snail *Monacha cartusiana*.

7.2 Features of European Interest

7.2.1 The site is designated as a Special Area of Conservation for its dry grasslands and scrublands on chalk or limestone, including important orchid sites.

7.3 Baseline conditions

Natural England condition assessment

7.3.2 During the most recent condition assessment process (September 2008/June 2009), 86% of Lydden and Temple Ewell Downs SSSI was judged to be in favourable condition. The remainder was recovering from inadequate grazing regimes. Management Unit 5 of the constituent SSSI is the only part of the SAC that lies within 200 m of the A2. The unit was also judged as being in favourable condition. The condition assessment process relates to SSSI features rather than SAC conservation status but it does provide a broad indication of the sward 'health'.

Recreational usage of the site

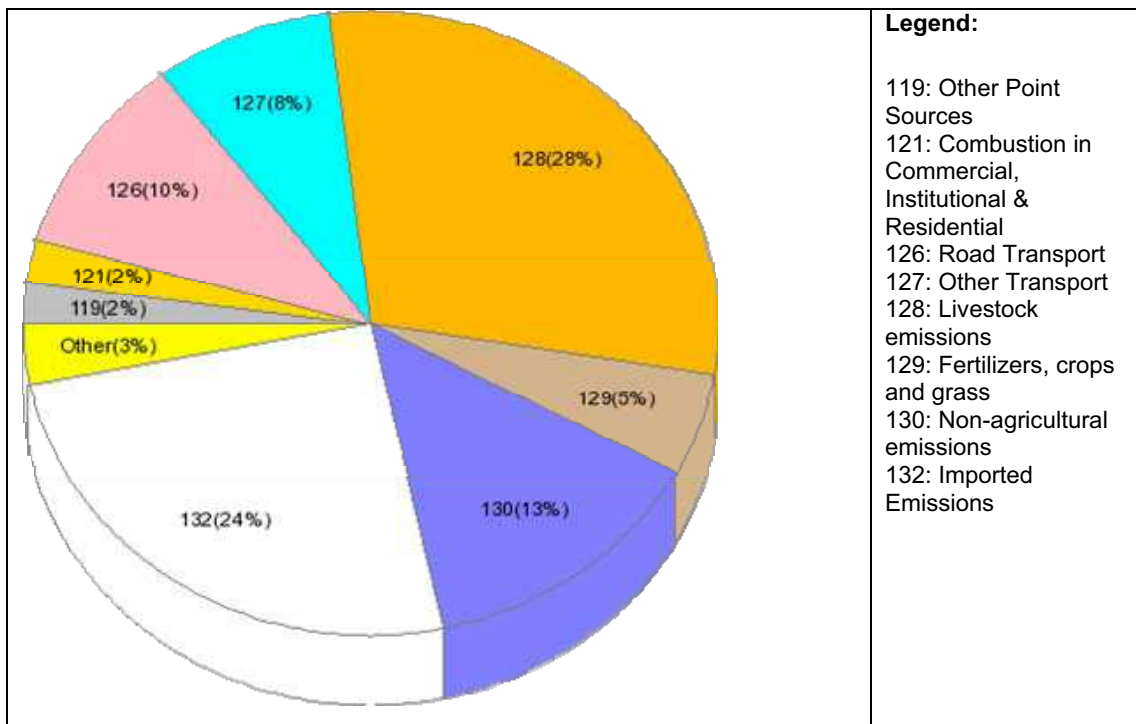
7.3.3 Data on Lydden and Temple Ewell Downs SAC collected through a 2010 visitor survey by Aspect Ecology demonstrate that the number of people currently using the SAC constitutes an average of approximately 50 people per day. The visitor survey identified that approximately 75% of visitors live within 4km of the site (50% from within 2km and 25% from between 2km and 4km away). Over 70% of visitors use the site more than once a week. The main reason that they visited the SAC was for dog walking and two thirds of respondents commented that the reason they came to this site rather than any other was due to the close proximity to their home and the lack of any alternative sites within walking distance of home.

7.3.4 The main current issue for nature conservation relates to restrictions on what grazing stock may be used on the reserve. Sheep grazing has been used in the past to manage areas of grassland but this is no longer considered practicable due to sheep worrying incidents. Consequently grazing is now by cattle and goats (and wild rabbit), although the livestock species may not provide the optimum sward characteristics for key wildlife species.

Air quality

7.3.5 From examination of the UK Air Pollution System (www.apis.ac.uk) the HRA of the Core Strategy identified that the SAC is currently subject to poor air quality. However, it should be noted that APIS provides a generalised picture based on a number of assumptions and this conclusion has therefore been revisited for this HRA in the light of bespoke air quality assessment work.

7.3.6 Peter Brett Associates³⁶ have measured air quality within Lydden & Temple Ewell Downs SAC as it lies adjacent to the A2 using diffusion tubes for the Whitfield Urban Extension SPD. Nitrogen deposition was in all three cases over the minimum critical load for calcareous grassland (15 kgN/ha/yr) at 20 kgN/ha/yr. However, the PBA studies also identified that even at these locations closest to the A2, this road contributes a small amount of the total nitrogen deposition (between 0.1 and 0.2 kgN/ha/yr). In other words the A2 is responsible for only 0.5% - 1% of the nitrogen deposited from atmosphere. This low contribution is due to the boundary of the SAC being 80m from the edge of the closest carriageway of the A2.



7.3.7 It can be seen from the above pie chart that according to the APIS website approximately 10% of atmospheric nitrogen deposition within the SAC as a whole derives from road transport sources (including diffuse sources)³⁷ while approximately 33% derives from agriculture (principally livestock) making this the sector which contributes the most to nitrogen deposition within the SAC. Approximately 24% of atmospheric nitrogen deposited within the SAC is due to 'imported emissions' i.e. emissions deriving from outside the UK (which will include some road transport sources).

³⁶ Peter Brett Associates. July 2010. Whitfield SPD, Dover: Air Quality Technical Report. Unpublished report for Philip Jeans Homes

³⁷ This is from all road transport sources and includes wet nitrogen deposition. The emissions from the local roads (i.e. within 200m) are assumed to only contribute to dry deposition.

7.4 Key Environmental Conditions

7.4.1 The key environmental conditions that support the features of European interest are:

- Maintenance of grazing;
- Lack of excessive trampling from both excessive recreational footfall and over-stocking leading to erosion/poaching;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Absence of direct fertilisation; and
- Well-drained soils.

7.5 Likely Significant Effects

Recreational pressure

7.5.2 Data on Lydden and Temple Ewell Downs SAC collected through a 2010 visitor survey by Aspect Ecology demonstrate that the number of people currently using the SAC constitutes an average of approximately 50 people per day. The visitor survey identified that approximately 75% of visitors live within 4km of the site (50% from within 2km and 25% from between 2km and 4km away).

7.5.3 Using 4km to define the core catchment of the SAC, twenty preferred sites lie within this zone: NS01SHE, SHE04V, LDF018, SHL031, LDF01, SHL042, SHL050, SHL070, NS08DOV, SHL062, SHL079, NS16DOV, LDF06, LDF08, SAD19D, SAD19C, LDF036, SAD19A, LDF030, LDF031 and SHL037. Between them, these twenty sites could accommodate approximately 855 dwellings. Assuming a population multiplier of 2.35 residents per dwelling, this would equate to 2,009 additional residents.

7.5.4 The area within 4km of Lydden and Temple Ewell Downs SAC has a population of approximately 40,000 people. The housing within the Plan will therefore mean a population increase of approximately 5%; by itself this may not lead to any adverse effect. This must however be considered in combination with the 5,750 new dwellings to be delivered at Whitfield Urban Extension which could (if fully occupied by new residents) involve a population increase of up to 32% within 4km of the SAC, much of which would be located within 2km.

7.5.5 The Whitfield Urban Extension will be responsible for 87% of all new housing to be located within 4km of the SAC and almost 100% of all new housing within 2km. The SPD for the Urban Extension already identifies the requirement for the WUE development to participate in ongoing management of the SAC and the delivery of an extensive area of alternative natural greenspace which will effectively neutralise WUE as a source of pressure. On the basis that the WUE development will not be granted permission unless it can 'consume its own smoke' the WUE development can therefore be removed from this calculation. This would leave the approximate 5% increase in visitors due to the developments set out in the Plan, all but two of which are situated over 2km from the SAC. It is considered that these developments would not lead to an adverse effect on the SAC on their own account and therefore would not need to provide mitigation provided that the effects of WUE could be addressed.

Air quality

- 7.5.6 Peter Brett Associates (PBA) determined for the Whitfield Urban Extension SPD that deposition at three points close to the A2 within 200m of Lydden & Temple Ewell Downs SAC was approximately 20.2 kgN/ha/yr. This is considerably in excess of the minimum critical load of 15 kgN/ha/yr but only 0.5% - 1% of the deposition is derived from the A2. Data provided by WSP and Peter Brett Associates for the Whitfield Urban Extension SPD identified that, by 2021, taking into account growth levels from development in the district set out in the Core Strategy (including WUE) and changes in background population levels there would be a modest fall (approximately 1,000 AADT) in traffic flows on the A2 to the west of the proposed A2 roundabout access to the WUE (i.e. the A2 link passing adjacent to the Lydden and Temple Ewell Downs SAC) following full build out of WUE. This effect was anticipated to be due to background traffic re-assigning to other routes in response to increased traffic flow through Whitfield roundabout. Since development due to the Plan will be a small fraction of that within the strategic allocations that were used in the transport modelling, it can be concluded that development planned for Dover district will not lead to a likely significant effect on this SAC due to air quality impacts.

Overall conclusion

- 7.5.7 It is considered that the development set out in the Plan will not result in adverse effects on the Lydden & Temple Ewell Downs SAC.

8 Folkestone to Etchinghill Escarpment SAC

8.1 Introduction

8.1.1 This long narrow site lies on a steep escarpment in a heavily urbanised environment being both situated on the outskirts of Folkestone and bisected by the A20, a major traffic route in southeast Kent. It is approximately 800 m to the west of Dover District and approximately 1 km from the nearest Dover settlement, the village of Capel-le-Ferne. It is approximately 7km at its closest from the nearest significant urban area in the district (Dover itself).

8.1.2 The site is one of the largest remaining areas of unimproved chalk downland in Kent. Three nationally rare plants listed on Schedule 8 of the Wildlife and Countryside Act 1981 and specially protected by law, are present; late spider orchid *Ophrys fuciflora*, early spider orchid *Ophrys sphegodes* and bedstraw broomrape *Orobanche caryophyllacea*. The site supports a diverse insect fauna including a number of nationally rare flies, moths and butterflies. Of special interest is the annulet moth *Gnophos obscuratus* which is noted for its different genetic colour forms. This is the only known locality in Britain for the form *fasciata*. In addition the nationally rare straw belle moth *Aspitates gilvaria* is found here. Among the butterflies the locally uncommon adonis blue *Lysandra bellargus* and small blue *Cupido minimus* are two species with a restricted distribution.

8.2 Features of European Interest

8.2.1 The site is designated as a Special Area of Conservation for its dry grasslands and scrublands on chalk or limestone, including important orchid sites.

8.3 Baseline conditions

Natural England condition assessment

8.3.2 During the most recent condition assessment process (completed June 2009), 73% of Folkestone to Etchinghill Escarpment SSSI was judged to be in favourable condition. Only 3% was unfavourable and declining, due to undergrazing.

Recreational usage of the site

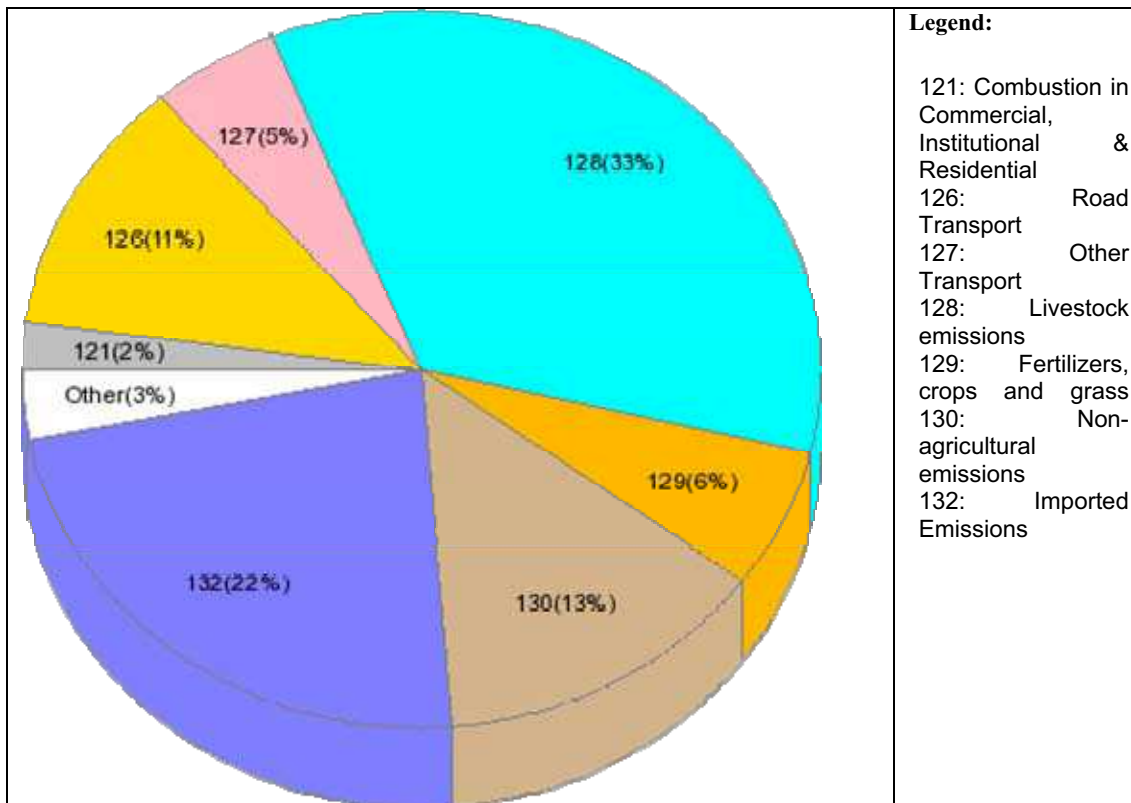
8.3.3 No recreational activity data has proven to be obtainable at this stage although surveys are being undertaken. However, given that it has similar interest features, structure and setting to Lydden & Temple Ewell Downs it is quite likely that a similarly local core catchment will apply to this site.

Air quality

8.3.4 As a whole the SAC is not currently subject to nitrogen deposition greater than the critical load; according to APIS³⁸, actual nitrogen deposition is 13 kgN/ha/yr, whereas the minimum critical load is 15 kgN/ha/yr. However, modelling undertaken for the Shepway Core Strategy does indicate that within 200m of the three roads

³⁸ Accessed 17/08/10

that traverse the site (Churchill Road, Canterbury Road and the M20 Eastbound) deposition is higher than the average for the SAC as a whole – approximately 16-17 kg N/ha/yr which is slightly above the minimum critical load.



8.4 Key Environmental Conditions

8.4.1 The key environmental conditions that support the features of European interest are:

- Maintenance of grazing;
- Low levels of trampling;
- Minimal air pollution – nitrogen deposition may cause reduction in diversity, sulphur deposition can cause acidification;
- Absence of direct fertilisation; and
- Well-drained soils.

8.5 Likely Significant Effects

Recreational pressure

8.5.2 Deal lies approximately 17km from the SAC measured in a direct line and almost 20km away following the roads. This places it well outside the probable core catchment for the SAC such that it is very unlikely that additional housing delivery at Deal is unlikely to lead to significant effects on Folkestone to Etchinghill Escarpment SAC.

- 8.5.3 There is no specific survey visitor data currently available for this site. Such a survey has been commenced but the final surveys will not be completed in time to be utilised in this HRA. However, preliminary results indicate that visitor numbers are low, with approximately 78% being 'locals'.
- 8.5.4 The site managers have confirmed that there have been some issues with a minority of visitors causing localised damage on the site (e.g. camp fires and motorcycle usage) although there is no indication of a wholesale problem with recreational usage per se. In particular, large parts of the SAC (especially at Cheriton Hill) constitute very steep scarp slope and are accessed by narrow lanes with very few places for cars to park. The White Cliffs Countryside Partnership has also been successfully managing large parts of the site for over twenty years with a programme of scrub clearance, grazing, restoration of chalk meadows, waymarking, wardening, interpretation and other forms of access control - particularly to stop motorbike scrambling which was once a significant issue.
- 8.5.5 It is therefore reasonable to conclude that the majority of visitors to Folkestone to Etchinghill Escarpment will live within roughly 4km of the site. As such, it is probable that north and east Folkestone, Lyminge and Hawkinge will all lie within the core recreational catchment of this site, and possibly eastern Hythe as well, measured purely 'as the crow flies'.
- 8.5.6 The main settlements within 4km of the SAC are all in Shepway district: Folkestone, Hythe, Lyminge and Hawkinge, which have a total population of 66,273 (i.e. approximately 97% of the total population within 4km of the SAC). In Dover district, the only settlement within 4km of the SAC where new housing will be allocated is Capel-le-Ferne which has a population of 2,040 (i.e. approximately 3% of the total population within 4km of the SAC).
- 8.5.7 Three small sites at Capel-le-Ferne (SHL060, LDF015 and CAP03) will deliver a total of 98 dwellings or 221 additional residents. All sites lie approximately 2km from the SAC so they may well fall within the recreational catchment. However, the contribution of these dwellings will clearly be dwarfed by the contribution from housing in Folkestone. In contrast, at least 3,800 new dwellings or 8740 residents within Shepway district could be located within 4km of the SAC. Therefore, new housing at Capel-le-Ferne is likely to account for less than 3% of any change in population within 4km of the SAC, with development in Shepway accounting for 97%. Moreover, the HRA of the Shepway Core Strategy concluded that housing growth in Shepway was unlikely to lead to a significant effect on the SAC. This conclusion was accepted by Natural England with the proviso that the conclusion would be reviewed on completion of visitor surveys.
- 8.5.8 On this basis, it is concluded that the contribution of development within Dover district to any 'in combination' recreational increase on Folkestone to Etchinghill Escarpment SAC is effectively inconsequential.

Air quality

- 8.5.9 Modeling undertaken for the Shepway Core Strategy identified that the actual nitrogen deposition contribution made by development in the Shepway Core Strategy would be approximately 0.01 kgN/ha/yr. Moreover, this will be against a background trend of improving air quality. As such it was concluded that even taking into account population increases expected across Kent the overall change in deposition would be less than 1% of the critical load (the initial threshold used by the Environment Agency and Natural England for scoping out contributions to atmospheric nitrogen deposition). Given that housing in the Plan DPD that lies

within close proximity to Folkestone to Etchinghill Escarpment will constitute only 98 dwellings this will form a minor component of regular traffic movements along the three roads that traverse the SAC, particularly when compared to traffic movements associated with housing in Shepway itself, it is unlikely that the predicted rate of deposition would exceed 1% of the critical load even when the additional housing in the Plan is taken into account.

Overall conclusion

- 8.5.10 It is considered that the development set out in the Plan will not result in adverse effects on the Folkestone to Etchinghill Escarpment SAC.

Appendix 1: Thanet Coast SPA Mitigation Strategy (Dover District Council, May 2011)

THANET COAST SPA MITIGATION STRATEGY

A Dover-based Development Mitigation Strategy

The following paper considers those developments that cannot, when taken *in-combination*, be ruled insignificant in terms of Regulation 61 of the Conservation of Habitats and Species Regulations 2010 and thus, could give rise to significant impacts on the Thanet Coast SPA, a Natura 2000 site.

The Need for Mitigation

It is apparent from an ongoing visitor disturbance study at Pegwell Bay (Thanet district) and Sandwich Bay (Dover district) that recreational impacts 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 and, consequently, adverse effects on their breeding performance.

Surveys and Mitigation Strategy

Visitor surveys carried out in late 2010 and early 2011 on behalf of DDC and other contributing parties indicated that recreational activities by residents in Dover are localised. This work supported an earlier 'Tourism Development and Planning at Sandwich and Pegwell Bay National Nature Reserve' report (University of Kent, nd). The division of the Thanet Coast SPA by the Stour estuary is important and allows for a more focused approach to provision of a mitigation strategy.

It is considered on the existing evidence that development in Dover is unlikely to have any impact on Pegwell Bay, but may impact Sandwich Bay. It is to be noted that any proposals that have an individual, or site-specific in-combination likely significant effect on the Thanet Coast SPA will be subject to separate mitigation requirements in addition to those in this strategy.

It is fundamental that the purpose of a development mitigation strategy is to avoid potential impacts brought about by demographic changes, rather than ameliorate pre-existing impacts. However, a strategy that may have coincidental effects on existing impacts would produce an overall benefit. Wardening, for instance, should, by its very nature, reduce existing as well as new impacts.

The mitigation strategy was initially proposed by developers and that has evolved over several months in discussions with Natural England. It has further been refined in the light of the surveys and ongoing discussions (May 2011) and comprises four elements:

1. The ability, if necessary, to draw on funding, via a bond, to support wardening at Sandwich Bay for a period up to 10 years.
2. Monitoring of potential impacts associated with Dover development to identify if and when such wardening (1) or other mitigation (4) is required;
3. Contribution to the Pegwell Bay and Sandwich Bay Disturbance Study to complement (2), provide weighting for different forms of disturbance and thus direct the role of wardening (1).
4. To use the monitoring (2) to identify lesser sources of development-related disturbance and to draw on the relevant developers contributions for mitigation of such.

Mitigation Rationale and Proportionality

It is generally accepted that for coastal recreational pressures, wardening provides the most secure mitigation and this is considered later in this document with application to the Dover Core Strategy housing allocations. For the mitigation to be proportionate there should be other tools available which can be applied incrementally, as necessary, and their effectiveness tested by monitoring. Such tools can include coastal user guidance leaflets, interpretation boards, the provision of regulations, such as dog control areas, and the enforcement of such regulations.

Monitoring will allow the source of new disturbance to be identified and the mitigation requirements to be applied appropriately, drawn as necessary, and proportionately, from developer contributions.

As developments progress and are monitored, it should become evident as to whether there are probable impacts on the SPA, or not. Therefore, it is reasonable that, in the event of no identified impact, there should be a 'cut-off' point for the bond from a particular development. This can best be aligned with monitoring periods. Allowing for maturation of a development, this should not be until at least a second monitoring period has passed subsequent to commencement of any development.

Application to Dover Core Strategy Housing Allocations

Potential recreational impacts on sites must, ultimately, relate to demographic change and this is the basis on which various applicants have prepared their planning documentation. In all cases, it is understood that the figure of an average 2.25 people/household (see DDC Core Strategy (CS) p.14) has been used. Application of the mitigation strategy to just housing number is simple, but may be refined further by application to house size in terms of bedroom number (CS, pp 43, 80). This would allow a degree of flexibility should individual developments come present justified departures from the housing mix in the Land Allocations Document.

On the basis of the above reasoning, bedroom figures are used. The following figures are based on the CS. For historic reasons, Aylesham is omitted. The CS contains a breakdown of expected housing types for Whitfield (WUE) and the rest of Dover (RoD). A simple analysis provides the total bedroom count in the CS.

For WUE: 5750 houses give a bedroom count of 12793

Bed No.	%	Of 5750 =	Bedroom No.
1	25	1438	1438
2	35	2012	4024
3	32.5	1869	5607
4	7.5	431	1724

For RoD: 7250 houses give a bedroom count of 17762

Bed No.	%	Of 7250 =	Bedroom No.
1	15	1088	1088
2	35	2537	5074
3	40	2900	8700
4	10	725	2900

Total Dover planned bedroom count = 30555

Monitoring and Build-Out

The issue of monitoring potential impacts is properly dealt with through visitor surveys, to establish whether the new developments in Dover have generated a greater visitor pressure on the Dover part of the SPA. The cost of such surveys is directly related to their frequency. Costs are considered later.

As the most sensitive time for disturbance is winter, the prime time for recreational surveys will also be then. There are two approaches – either annual surveys, regardless of development, or surveys based on development quantum triggers: the latter is CIL compliant. It is also reasonable to consider that, if recreational impacts increase, there may be a need to intensify survey effort in order to clarify any need for wardening, thus, reinforcing the quantum trigger approach.

The LDF has a fixed lifespan, to 2026, unless overall LDF monitoring indicates that a review needs to be made earlier.

Building out of developments takes time and that will determine when population increase occurs. Although the main Dover project is WUE, it only equates to 44% of the total housing development in Dover. According to the WUE masterplan, it would take approximately nine years to build out Phase 1 and Phase 1a (1400 houses/3115 bedrooms). Without evidence to the contrary, applying the 44%, it is considered that by completion of these phases 7080 bedrooms throughout Dover might be completed.

There is no evidence from the survey work carried out to indicate that WUE Phase 1 and 1a *alone* would impact the SPA and, therefore, it seems reasonable to trigger the 1st monitoring surveys by the number of completed bedrooms associated with those phases. For simplicity, this has been rounded down to 3000. Taking on board the wider developments in Dover, this first monitoring could, however, occur as early as within 4 years of commencement of WUE and after completion of approximately 1370 bedrooms, giving a fine-scale measure of potential impacts and their sources.

Monitoring would need to be continued and it is reasonable to assume that if impacts do begin to occur they will intensify as development proceeds. Therefore, the monitoring intervals are slightly tapered. The suggested taper is:

Survey Number	Incremental Bedroom No.	Total Bedroom No.
1	3000	3000
2	3000	6000
3	3000	9000
4	3000	12000
Potential Break Point due to LDF Review		
5	3000	15000
6	3000	18000
7	3000	21000
8	2500	23500
9	2500	26000
10	2250	28250
11	2250	30500

A tentative break point has been inserted for the LDF review. This would allow a comprehensive review of the relationship of development in Dover to the requirements of the Conservation of Habitats and Species Regulations 2010, or any later legislation. The effectiveness of monitoring and mitigation would be amenable to detailed examination and any necessary revisions then be applied to any future Land Allocations.

Overall Cost Estimates

This strategy has evolved through discussions over several months with Natural England and ecological consultants working for three developers in Dover, with consideration of the views of other bodies – RSPB, KWT, and the Thanet Coast Project (an operative arm of the North East Kent European Site Management Scheme).

An overall figure of £400,000 was initially considered, with a split of 3/1 for wardening/monitoring. This mitigation was based on population growth figures.

£300,000 would cover the cost of wardening Sandwich Bay for 10 years. While this might seem to cover a relatively short period, it would, when making allowances for development commencement and build-out times, cover the lifetime of the Local Development Framework (LDF), which runs to 2026, and beyond. However, there may be additional costs, such as enforcement, to be considered. For this reason, DDC consider a figure of £350,000 would provide greater assurance of effective wardening. This element of the strategy would be in the form of a bond, to be drawn upon as necessary.

It is considered that a series of 11 surveys should form the baseline, based on a tapered bedroom count: 7 @ 3000, followed by 2 @ 2500 and then 2 @ 2250. This would encompass the totality of Dover development. Allowing £5000 per survey, this would equate to £55,000. The eleven surveys extend well beyond the LDF lifetime.

Despite various efforts, it has not been possible to obtain costings of the current disturbance study at Pegwell Bay and Sandwich Bay. However, ENTEC have provided an estimate which is robust, at £100,000 for a two year study. As it is robust, it is now proposed that this sum should also include provision for interpretation, signage and leaflets (£15,000). The timing of this study will require consultation with Natural England, but is provisionally set to commence 8 years after the completion of the current study, that is 2020/2022.

Therefore, the overall sum sought for mitigation purposes is £505,000, of which £350,000 would be in the form of a bond.

Cost per House, Depending on Bedroom Number

Bedroom No	Bond	Monitoring etc.	Total
1	11.46	5.07	16.53
2	22.92	10.14	33.06
3	34.38	15.21	49.59
4	45.84	20.28	66.12

There is a level of development which it would not necessarily be cost-effective to include in this scheme. It is considered appropriate this would be 15 or more units, which at a strategic density of 30 units/ha, would also have to be screened for EIA. While the requirements of the Habitats Regulations would still apply to smaller numbers, including appropriate assessment, each development would need to be considered on its own merits.



Land Allocations Pre-Submission Local Plan

October 2012

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1 Introduction

What is the Land Allocations Local Plan?

1.1 The Land Allocations Local Plan is a planning policy document that forms part of the statutory Development Plan for Dover District. Its primary purpose is to allocate land for development and to set out any issues or criteria that subsequent planning applications will need to address. It should be read in conjunction with the other parts of the Development Plan which, at the time of preparation, consists of the Dover District Core Strategy 2010 and some policies from the Dover District Local Plan 2002 that have been saved (see Annex 1). The Regional Spatial Strategy for the South East also forms part of the Development Plan, although it is the Government's intention to abolish the Strategy.

1.2 The Core Strategy is the overarching planning policy document for the District. It sets out the strategy for the future of the District as a place to live, work, relax and visit over the period to 2026. The Core Strategy identifies the overall economic, social and environmental objectives for the District and the amount, type and broad location of development that is needed to fulfil those objectives. The primary purpose of the Land Allocations Local Plan (the Plan) is to identify and allocate specific sites that are suitable for development in order to meet the Core Strategy's requirements and make a major contribution to delivering the Strategy. It covers the same plan period as the Core Strategy.

1.3 In setting out what type of development is being promoted where, the Plan will provide local communities, landowners, developers and infrastructure providers a large degree of certainty about the future pattern of development in the District. Specific development proposals for the sites identified in the Plan will, however, need to gain planning permission before development can take place.

National Planning Policy

1.4 National planning policy is set out in the National Planning Policy Framework. Local Plans must be prepared within the context set by the Framework. The Framework embodies a 'presumption in favour of sustainable development' (defined ⁽¹⁾ as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'). There are three dimensions to sustainable development that give rise for the need of the planning system to perform a number of roles: an economic role, a social role and an environmental role.

1.5 The Framework states that all plans should be based upon and reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally. The Core Strategy sets out the Council's overall approach towards the local application of sustainable development through its objectives and core policies and this Local Plan provides further guidance in Chapter 2.

1.6 When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development. It will work pro-actively with applicants to find solutions that, wherever possible, enable proposals to be approved, and to secure development that improves the economic, social and environmental conditions in the area.

1.7 In accordance with the Framework, planning applications that accord with the policies in the Development Plan will be approved without delay, unless material considerations indicate otherwise.

1.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole; or
- Specific policies in that Framework indicate that development should be restricted.

Neighbourhood Plans

1.9 Neighbourhood Planning is a new element of the planning system introduced in 2012. A fundamental principle of neighbourhood planning is that it is community-led (including residents and/or businesses), with the community establishing local (non-strategic) planning policies for development and use of land within its neighbourhood. Neighbourhood Development Plans enable local people to play a leading role in responding to the needs and priorities of the local community.

1.10 Neighbourhood Plans can be prepared by Town and Parish Councils. Production of a Plan is at the discretion of those Councils. A Neighbourhood Plan must conform generally with the District Local Plan and must not promote less development than the Local Plan or undermine its strategic policies. Once a Neighbourhood Development Plan is adopted it will become part of the Development Plan for the District.

1.11 The preparation of a Neighbourhood Plan for part of the parish of Worth has been undertaken in parallel with the latter stages of the Land Allocations Local Plan. In order to allow the local community the widest opportunity to determine local policies for their area the District Council is not proposing any land allocations or new local planning policies in the Worth Neighbourhood Plan area.

Structure of the Local Plan

1.12 The sustainable development context for preparing the Plan is set out in Chapter 2. This is based upon the Core Strategy and subsequent monitoring and evidence base studies that have been undertaken since the adoption of the Core Strategy.

1.13 Chapter 3 is the main body of the Plan. It identifies the site allocations for development on a settlement basis starting with Dover, as the major focus for development, followed by Deal and then Sandwich, as the main focus for development in the rural areas (the strategic expansion of Aylesham remains promoted through saved Local Plan policies). Each settlement contains a summary of its characteristics, with particular reference to housing, employment and retail and how development in that location will meet the aims and objectives set out in the Core Strategy. The chapter continues with an introduction to the rural area before considering Local Centres and Villages. For each settlement where allocations have been made there is a description of the settlement and a table of the allocated sites. A policy setting out specific matters to be addressed through planning applications is also provided where the Council considers this to be warranted by the individual factors relating to an allocated site that are not sufficiently covered by other Development Plan policies. Appendix 3 includes plans defining the boundaries of allocated sites to show how the Proposals Map

will be revised when the Plan is adopted. The summary table for each area also identifies amendments to settlement confines which are likely to result in developments too small (under 5 dwellings) to warrant a site allocation and these changes are also shown on the plans in Appendix 3.

1.14 The remainder of the Plan consists of delivery and monitoring arrangements (chapter 4), an Annex containing development management policies that adds to a similar Annex in the Core Strategy and various Appendices.

Delivery and Monitoring

1.15 It is important to ensure there is a reasonable prospect that the Plan's proposals can be implemented over the plan period and that a sufficient amount of land is readily available to meet short term needs. The Council has liaised directly with the owners of allocated sites in order to obtain an indication of the time frame within which sites could be made available for development. The Council has also, as part of its site assessment process, investigated whether there are any barriers to the development of sites to establish realistic assumptions about the likely timing of development. The cost of requirements likely to be applied to development proposals, such as contributions towards additional infrastructure and meeting Code for Sustainable Homes requirements, have been taken into account through the Council's work on the Community Infrastructure Levy to ensure that the Plan's proposals are economically viable overall.

1.16 In drawing the Plan together, Chapter 4 details monitoring arrangements, and identifies how the District Council will monitor the projected completion rate of housing and other development and track this against the targets in the Core Strategy.

2 Overarching Policies

2.1 The context for preparing the Plan is set by the District Core Strategy. The Strategy is based upon an analysis of the District's social, economic and environmental characteristics and performance which underpins the Aim, Objectives and Key Features. Since the adoption of the Core Strategy, monitoring (through the Council's Annual Monitoring Report) has shown that considerable progress has been made in providing the infrastructure to support the Strategy. Due to general economic conditions and economic activity the employment base has fallen and unemployment risen with housebuilding levels declined. In addition, the level of social disadvantage has risen, although skills levels have improved.

2.2 Overall, the Strategy's Aim, Objectives and proposals remain firmly relevant but implementation is slowing suggesting that it will take longer to realise the Strategy. In line with the Strategy's programme management mechanism, that the Council will need to maintain and increase (as resources permit) its proactive role in promoting development opportunities.

2.3 Since the adoption of the Core Strategy the Council has undertaken further work in the economic and environmental areas of sustainable development. This work has influenced the preparation of the Plan by providing additional context for development land allocations and, in the case of the economic work, identified the need to adjust the Strategy's provision for new employment and retail floorspace.

2.4 **Insert a section on place shaping**

Employment Development

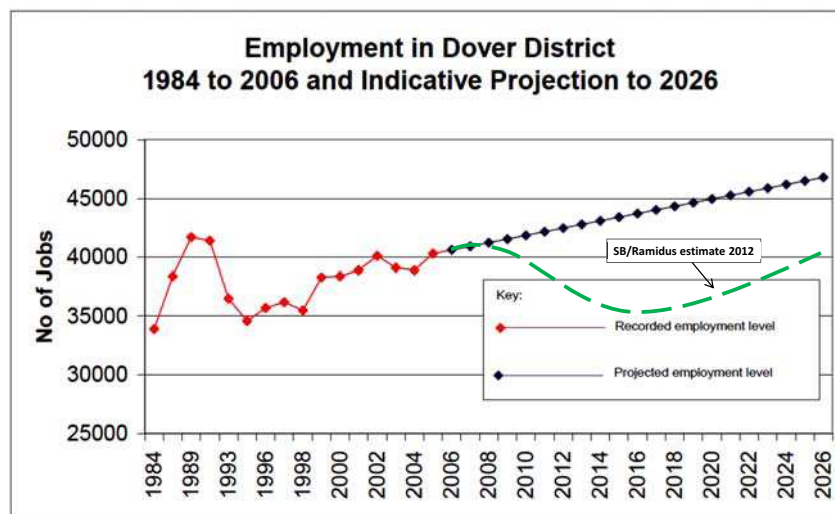
2.5 The Core Strategy's provision for additional employment and retail development was based upon research carried out prior to the national economic recession that took hold around 2009. In order to ensure that the Plan is based on up-to-date information the Council has undertaken further research (Dover District Employment Update 2012).

2.6 In relation to employment development (defined in the Core Strategy as Use Classes B1, B2 and B8) the study has found that Strategy's employment growth outlook of 6,500 jobs growth is no longer likely to be achievable over the period to 2026, although this remains a longer term objective. The Core Strategy proposed that this Plan makes provision for around 64.7 hectares of land for employment uses (to accommodate around 200,000 square metres of floorspace) through reviewing and carrying forward suitable existing allocations and commitments. As a consequence of the Employment Update this now needs to be reconsidered.

2.7 There are two main factors which lead to these findings. Economic recession has meant that the projected trend based growth in the public sector, finance/business services and distribution/hotels/catering is unlikely to materialise and there will be delay in realising the planned employment growth proposals in the Strategy. The second factor is the major contraction of the pharmaceuticals research and development facility at Sandwich which is estimated, along with decommissioning a nuclear power station at Dungeness (in Shepway District) to lead to between 4,000 and 5,000 job losses in the District by 2018. In addition the contraction of the pharmaceutical business at Sandwich has created the vacancy of some 280,000 square metres (2.8 million square feet) of largely modern research and development and related business floorspace. The impact of the contraction of the pharmaceuticals business on the District's unemployment level has not, however, been as

severe as may be feared. Only around 40% of those previously employed in pharmaceuticals lived in the District, many of those moved elsewhere to alternative employment, some retired and around 600 jobs have been retained on the site. The site itself was designated as an Enterprise Zone in 2012 to help stimulate re-use of the site.

2.8 The implication of these changes is that the jobs base has fallen from the 2006 level and may only recover by the end of the Plan period, as illustrated by the following graph.



Picture 2.1 Employment in Dover District

2.9 As a result, there is not now likely to be a quantitative need to allocate more than 5 hectares of land for employment uses. This, however, needs to be tempered by other factors such as ensuring a geographic distribution of employment sites that reflects and supports Core Strategy objectives, and choice of quality of site to appeal to different business sectors. In addition, the best sites for employment development should be retained for the long-term (beyond 2026) as it would be particularly difficult to replace them should they be lost to other forms of development. Within these considerations the Plan has drawn on the assessment of all the employment land options in the District Retail and Employment Update in order to determine which sites should be carried forward as allocations in the Plan, what type of job creating uses would be appropriate and, for those sites no longer assessed as required for employment purposes, whether they would be suitable for alternative forms of development (see Table 3.2).

Retail Development

2.10 The Core Strategy's provision for additional retail development was based upon research carried out prior to the national economic recession that took hold around 2009. In order to ensure that the Plan is based on up-to-date information the Council has undertaken further research (Dover District Retail Update 2012).

2.11 The Update found that the District has improved its overall retention of both convenience and comparison shopping expenditure compared with the position in 2007. There is particularly high retention rate of convenience expenditure in Dover and Deal (95%) and a lower rate of 65% in Sandwich. A lower rate in Sandwich is not unexpected as it is a smaller centre and competes with Dover, Deal, Canterbury and Westwood Cross.

2.12 The Update examined the prospect for additional retail floorspace over and beyond the Plan period taking account of permissions yet to be implemented and Core Strategy allocations. The result is summarised in the following Table.

Period	Dover Trade Area		Deal/Sandwich Trade Area	
	Convenience	Comparison	Convenience	Comparison
2012	-8,700	-41,200	800	370
2017	-7,100	-34,900	1,500	2,500
2022	-5,300	-25,600	2,200	5,800
2026	-4,500	-19,700	2,400	7,700

Table 2.1 Retail Floorspace Capacity (by trade area, in cumulative square metres of gross floorspace rounded and net of pipeline development)

Source: Dover District Retail Update (2012)⁽²⁾⁽³⁾

2.13 This illustrates that, for the Dover trade area, the Core Strategy's substantial allocations are more than adequate to accommodate the likely amount of demand for additional floorspace identified in the Retail Update (2012). The Update is, however, based on retaining a constant market share whereas the Strategy's objective is to increase the retention of retail expenditure, and hence market share, at Dover. The level of allocated land is therefore considered to be appropriate.

2.14 In the Deal/Sandwich area most of the potential for additional convenience floorspace can be ascribed to Sandwich where it would help to raise the retention rate of expenditure. The issue is taken forward in the Sandwich section of this Plan.

2.15 The potential for additional comparison shopping floorspace arises mainly from Deal where there is opportunity to improve the range and choice of the town's offer and help retain a higher level of expenditure. Opportunities for redevelopment in the town centre are, however, limited by the historic environment. The Council has been unable to identify a suitable site within the town centre or on the edge-of-centre to meet this need.

2 Retail commitments, for convenience goods, includes: 3,205 sq m net (or circa 5,450 sq m gross) at St. James Area which is estimated to turnover £35.5m in 2012; 3,500 sq m net (or 5,000 sq m gross) at Dover Waterfront which is estimated to turnover £42.0m in 2012; and 668 sq m net (or 1,335 sq m gross) in the Whitfield Urban Expansion which is estimated to turnover £4.7m in 2012.

3 Retail commitments, for comparison goods, includes: 3,901 sq m net (or 5,574 sq m gross) at White Cliffs Business Park which is estimated to turnover £15.6m in 2012; 7,477 sq m net (or 12,712 sq m gross) at St. James which is estimated to turnover £30.0m in 2012; 6,672 sq m net (or 11,342 sq m gross) at Dover Mid-Town which is expected to turn over £26.8m in 2012; 10,500 sq m net (or 15,000 sq m gross) at Dover Waterfront which is expected to turnover £42.1m in 2012; and 668 sq m net (or 1,335 sq m gross) in the Whitfield Urban Expansion which is estimated to turnover £2.7m in 2012.

2.16 The Council is, in furtherance of commitments in the Core Strategy, investigating the potential for improved access and possible further development in the northern area of Deal. This investigation has, as at 2012, yet to reach conclusion. Should its findings show that there is potential for development the mix of uses, including the suitability of retail, will be taken forward through a separate Local Development Document.

2.17 In the absence of the Council selecting a suitable site for comparison goods floorspace at Deal, a Development Management Policy is included in Annex 1 (Policy DM26) in order to guide any development proposals which may come forward.

2.18 Finally, to reflect the recommendations in the Retail Update (2012) changes have been made to the town centre boundary's in Dover and Deal, and a town centre boundary provided for Sandwich. Further details are provided in the discussion for the individual settlement.

Dover District Heritage Strategy

2.19 The District of Dover is possibly unique in the wide breadth of heritage assets that are located in the area. To ensure that these assets are used positively to support regeneration and to conserve them in a manner appropriate to their significance, it is necessary to understand their value. The Dover District Heritage Strategy has identified thirteen broad themes to categorise the numerous individual or groups of assets in the district and has assessed their significance. Eight of these themes are considered to be of 'outstanding significance' and are of national, rather than district, importance.

2.20 This unique resource, which is unlikely to be replicated in other Districts in the country, is not, however, being used to its full potential. The overarching policy background has already been established in the Core Strategy which has the aim to 'Make better use of historic assets at Dover' and an objective to 'Ensure the intrinsic quality of the historic environment is protected and enhanced and that these assets are used positively to support regeneration, especially at Dover'.

2.21 The Government also recognises the importance of the historic environment in the National Planning Policy Framework. This states that Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment and in doing so should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance.

2.22 The Dover District Heritage Strategy, which was finalised following the publication of the NPPF, identifies four objectives.

Dover District Heritage Strategy Objectives:

1. Dover District's historic environment and its heritage assets play a proactive role in enabling and informing regeneration activities to secure better outcomes from sustainable growth.
2. Dover District realises the tourism and visitor potential and economic benefits of its historic environment and heritage assets.
3. Dover District's heritage assets are sustained and enhanced so as to best meet the needs of the present without compromising the ability of future generations to appreciate their significance.
4. Public understanding of, engagement with, access to and enjoyment of Dover District's historic environment are increased.

2.23 From these four objectives, 27 recommendations have been identified. These cover a wide range of issues, some of which require policy support, to others that would require asset specific actions. An action plan will be drafted with the community to take these recommendations forward.

2.24 The recommendations have been considered as part of the development of the Land Allocations Local Plan in terms of Plan Making and Development Management.

Plan Making

2.25 The considerable amount of information that has been gathered and presented as the thirteen themes and the identification of opportunities and constraints for each of these, has influenced the plan making process. The thirteen themes have been used to assess how;

- the heritage assets could be used in regeneration;
- tourism can be enhanced; and
- assets could be incorporated into developments.

2.26 In particular, sites that have been proposed for residential allocations have been assessed against a 'Themes Assessment' check list that has been created as part of the Heritage Strategy. Each site has had a desk top assessment against each of the thirteen Themes and scored against a five point scale (1 having a major impact (colour coded red), 5 having no impact (colour coded green)). The scoring and colour coding provided a quick overview of which sites had the most impact on the district heritage assets. This provided a starting point for any heritage considerations for the preferred sites.

Development Management

2.27 This Plan provides additional support to the Heritage Strategy and considers three broad areas:

- To promote better understanding of heritage assets in the District;
- To provide guidance for landowners; and
- To provide guidance to make planning decisions.

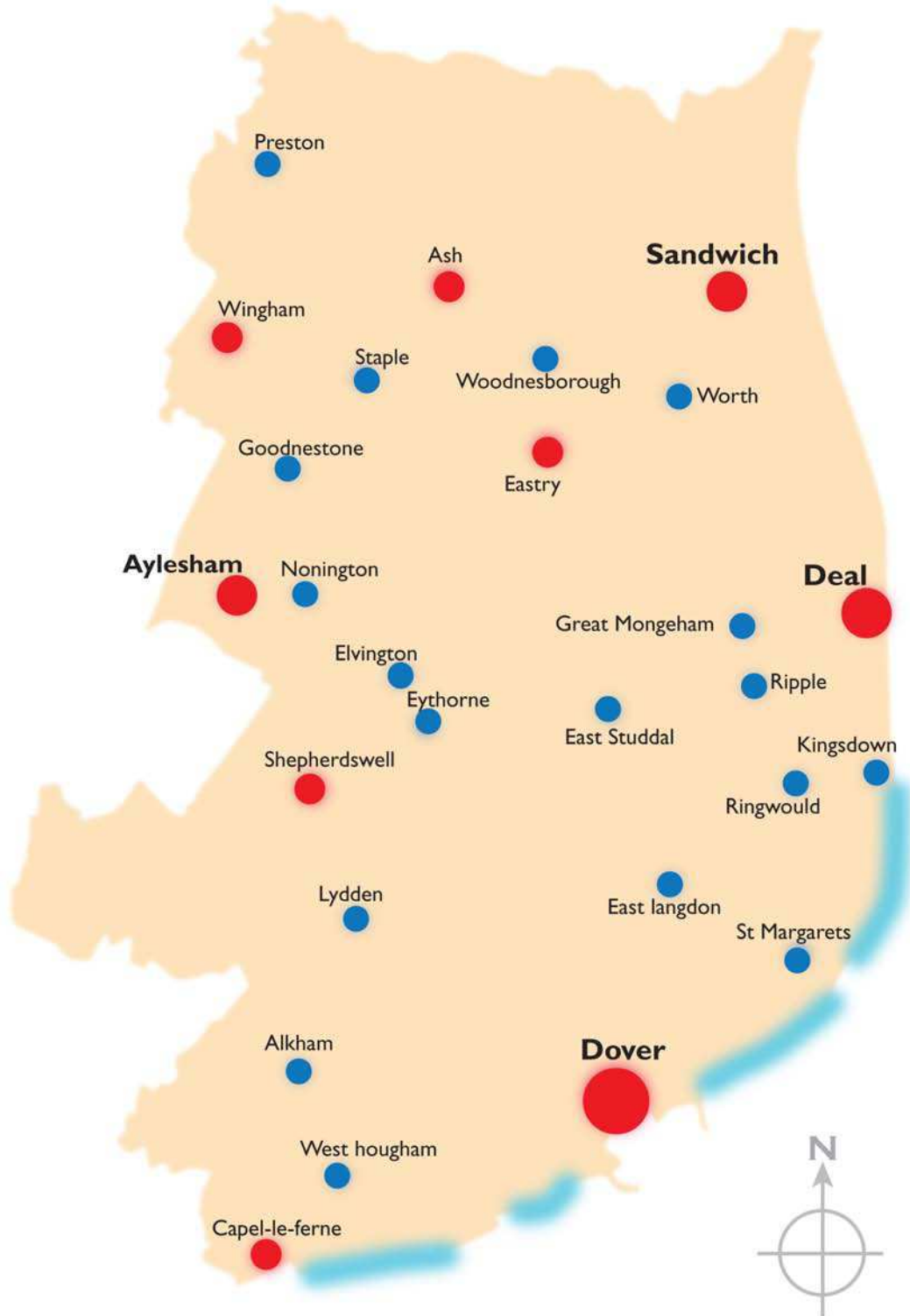
2.28 Annex 1, Development Management Policies, considers these issues.

Coastal Change Management Areas

2.29 The Coast Change Management Area Mapping Study was carried out in September 2010 and this has identified areas likely to be affected by physical changes to the coast. These areas are referred to as Coastal Change Management Areas (CCMAs).

2.30 The study was based on the work that has already been undertaken for the two Shoreline Management Plans for the district (the South Foreland to Beachy Head SMP and the Isle of Grain to South Foreland SMP). Seven CCMA were identified along the District's southern coastline from Kingsdown to Caple-le-Ferne. The seven CCMAs are:

- Oldstairs Bay
- Hope Point to St Margaret's
- South Foreland
- South Foreland to Dover
- Shakespeare Cliff
- Abbots Cliff
- Folkestone Warren



Picture 2.2 Diagram illustrating the broad location of the Coastal Change Management Areas

2.31 The identified areas are not intended to be used to define areas that are at risk of coastal erosion, instead the role 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 those areas.

2.32 The sites that have been identified in this Plan have been assessed against the CCMA's as part of the Council's site selection process and the seven CCMA's are defined on the Dover District Proposals Map (please see maps in Appendix 2) to help guide future development.

2.33 With regard to future planning applications and assessment against the CCMA's it is not proposed to include a policy in this Plan as the NPPF and the accompanying Practice Guide sets out the planning considerations for Coastal Change Management Areas (CCMA). The considerations for making planning applications are set out in Annex 1.

Green Infrastructure, Open Space and Play Standards

2.34 Green spaces and natural elements within and between the built environment provide a wealth of benefits, from promoting active recreation to managing flood risk. Dover District is generally well resourced with accessible semi-natural land and open space facilities; however there are gaps in provision and in some cases the quality falls below expected standards. In addition, demand arising from the expected growth will increase pressure on existing resources and facilities. Maintenance and enhancement of this green infrastructure (GI) network is a central component in the promotion of sustainable development. To ensure that green infrastructure issues are appropriately incorporated into the development plans, a framework of local standards and supporting strategies have been prepared in parallel with this Plan.

2.35 Positive planning for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure should be sought (NPPF, 114). Improvements in accessibility to, or quality of existing natural and semi natural open space will usually be appropriate, except where European and Ramsar site mitigation requires the creation of additional accessible open space to deflect recreational pressure. Locally determined standards for provision of accessible (amenity) green space, outdoor sports facilities, children's equipped play space and allotments are set out in Annex 1. These standards will allow the Council to calculate the requirements for open space arising from new developments. New facilities may be provided, but if possible additional demand should be satisfied by increasing the capacity of existing facilities. Actions will be guided by priorities identified in the supporting strategies.

2.36 Internationally and nationally important sites for biodiversity and geodiversity are protected from harmful development by law, while policies CP7 and DM25 in the Dover District Core Strategy protect non-statutory sites and the wider green infrastructure network. To aid the application of these policies, statutory nature conservation sites and publicly accessible open spaces are identified on the Local Plan Proposals Map. Non-accessible open space with current or potential amenity value is also recognised on the map, the most common type being school playing fields. The designation is sometimes applied to undeveloped land in private ownership if it is the only remaining open space in an urban environment. A further component of GI in the district is statutory open access downland, mapped by the Countryside Agency in 2004.

2.37 Protected open space designations on the Local Plan Proposals Map were last updated in 2002, when the Local Plan was adopted. Changes in open space provision have occurred since that time, for example Fowlmead Country Park opened in 2007. A set of amendments to the Proposals Map is presented in Appendix 4. These alterations also correct boundary errors that arose when the map was digitised and incorporate sites that were omitted in error. The Council put forward most of the amendments for consultation in 2008, but some of the proposed changes reflect more recent factual changes or newly identified inconsistencies.

3 Sites

3.1 The Core Strategy has identified that land should be allocated for 14,000 new homes with a target to complete a minimum of 10,100 homes by 2026. This Plan identifies the site specific allocations and designations in Dover, Deal, Sandwich and the rural areas that will be required to deliver the vision set out in the Core Strategy (see Core Strategy Policy CP3). After taking into account the Strategic Allocations that are included in the Core Strategy (Dover Waterfront, Mid Town, Connaught Barracks and the Managed Expansion of Whitfield which together allocated land for 6,650 homes in Dover) this Plan allocates land, inclusive of completions and unimplemented consents since 2006, for:

2,950 homes in Dover;

1,600 homes in Deal;

500 homes in Sandwich; and

1,200 homes in the rural area.

3.2 In addition, land is allocated at Aylesham for 1,000 dwellings through Saved Local Plan policies.

3.3 A Housing Information Audit is carried out each year by Dover District Council which provides the number of completions, unimplemented and extant consents. Table 3.1 sets out the residual amount to be allocated in this Plan in each part of the District.

	Dover	Deal	Sandwich	Rural Area
Total Identified in Core Strategy	9,700	1,600	500	1,200
Less sites identified through Strategic Allocations (in Dover) and urban extension areas (in Deal and Sandwich)	-6,650	-680	-100	
Less sites identified through Planning Applications (includes completions, unimplemented full and outline consents)	-1,526	-715	-272	-340
Residual amount to be allocated	1,524	205	128	836

Table 3.1

3.4 Historically, over the period from 2006 to 2011, Dover town has had a total of around 500 dwellings which were completed that fall within the category of 'windfall'⁽⁴⁾. The Core Strategy has identified an ambitious 9,700 dwellings to regenerate Dover town. Through the Local Plan process it has been possible to identify approximately 94% of this requirement;

4 The term 'windfall' is used to refer to those sites which become available for development unexpectedly and are therefore not allocated for development within the Development Plan

these allocations are detailed within the Dover section of this Plan. The remaining requirement of 6% (620 dwellings) will not be allocated and is expected to be met through windfall sites. These sites will not be considered within the first five years of the Plan.

Rural Area

3.5 The Core Strategy figure of 1,200 dwellings for the Rural area, is not distributed to particular settlements in the hierarchy, nor divided into rural north or rural south. Policy CP1 of the Core Strategy sets out a Settlement Hierarchy which details the general role of individual settlements. The second half of the hierarchy provides the basis for the distribution of development across the rural area. An extract is included below:

Settlement Type	Function	Town/Village
Local Centre	Secondary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to its home and adjacent communities	Ash Capel-le-Ferne Eastry Shepherdswell Wingham
Village	Tertiary focus for development in the rural area; suitable for a scale of development that would reinforce its role as a provider of services to essentially its home community	Alkham, East Langdon, East Studdal, Elvington, Eythorne, Goodnestone, Kingsdown, Great Mongeham, Lydden, Nonington, Preston, Ringwould, Ripple, St. Margaret's, Staple, West Hougham, Woodnesborough, Worth
Hamlet	All other settlements in the rural area; not suitable for further development unless it functionally requires a rural location	All other settlements

Site Selection Process

3.6 This Plan has been prepared following two public participation stages. After a 'call for sites' in 2005, the Council undertook public engagement on the Preferred Options in 2008. This Plan was then put on hold until the Core Strategy was adopted in 2010. As a significant time had lapsed, the District Council undertook another call for sites in 2010 and undertook a further public engagement exercise for the new sites in 2010 (this was called the 'Interim Consultation').

3.7 In 2008/9 the District Council undertook a Strategic Housing Land Availability Assessment (SHLAA). This assessment considered all the sites that had been submitted by landowners and developers to the Council for consideration for development as part of the Local Development Framework. As part of the initial assessment process the SHLAA screened the sites against a list of criteria based on National Policies and size. These included

designations such as Areas of Outstanding Natural Beauty (AONB), Heritage Coast, European nature conservation sites and areas within Flood Zone 3. All sites less than 0.17Ha were excluded from the SHLAA.

3.8 Building on the assessment for the SHLAA and with input from specialists in conservation and heritage, ecology and highways (KCC), a more in depth analysis of every site has been undertaken. Sustainability Appraisal (SA) has been used to help identify issues, test options and identify the preferred option that forms the basis of this Plan. Further details are contained within the SA Report.

3.9 This Plan has also been prepared against a background of increasing concern to ensure that its proposals are economically, socially and environmentally sustainable and that it is responsive to the likely impacts of climate change. Together with the SA, the Council has drawn on the process of Habitat Regulations Assessment to help ensure that the Strategy is robust in these respects.

3.10 In addition to the issues raised in the Core Strategy, other designations need to be considered when identifying land for development. In summary, the issues which have been taken account of in the site selection process are set out below.

Kent Downs AONB

3.11 The Kent Downs AONB, is predominately located in the south of the District. Consideration must be given not only to the impact development could have on the AONB, but also the impact on the setting of the AONB. The AONB is particularly a constraint to development in the settlements where the boundary is immediately adjacent to the existing built development. In Capel-le-Ferne, Kingsdown, Lydden, and St.Margaret's there are very limited development opportunities that would not damage the setting of the AONB or the character of the village itself. The villages of Alkham and West Hougham are located entirely within the AONB, and although this does not restrict development entirely, it is a key factor which must be taken into account as part of the assessment of sites.

Heritage Coast

3.12 Along much of the coastline, particularly in the south of the District, where the AONB meets the coast it has been designated a Heritage Coast. The national purposes of Heritage Coast include to conserve, protect and enhance the natural beauty of the coasts, their marine flora and fauna, and their heritage features.

Flood Risk

3.13 To the north east of the District, from an area covering the northern part of Deal and Sandwich up to the boundary line with Thanet, there are large areas at risk from tidal flooding (Flood Zone 2 and 3). The Environment Agency plans to improve the sea defences at both Deal and Sandwich, which will reduce the risk of flooding. Flood Zone 3, which equates to those areas at greatest risk of flooding, is divided into Flood Zone 3a and Flood Zone 3b. Sites which are located within Flood Zone 3b, the functional floodplain, have been considered unsuitable given the risk of flooding to human life.

European Designations

3.14 European natural habitat designations (Ramsar, Special Areas of Conservation and Special Protection Areas) are located to the north east of the District covering similar areas to those at risk of flooding. There are very stringent guidelines as to the type of development which would be permitted in these areas.

Approach to Site Allocations

3.15 For each settlement where allocations are made a description of the settlement is given, followed by site specific allocations. These are colour coded according to the type of allocation:

A policy that allocates a site for development and sets out site specific criteria which will need to be addressed by planning applications

Allocating a site for development without a policy where the acceptability of planning application proposals will be judged against general Development Plan policies and material considerations, or change to settlement confines

The site is covered by a saved Local Plan policy contained within the Dover District Local Plan (2002)

The policies for sites allocated for development focus on the principles of development and are not intended to provide policy guidance on every aspect. They must therefore be read in conjunction with other general development management policies, including development management policies in the Core Strategy and this Plan.

Employment

3.16 The Employment Update reviews and reassesses the evidence base underpinning the Council's employment policies and land allocations in light of changing economic circumstances and the new national planning policy context.

3.17 This includes a reassessment of each saved Local Plan site allocation and an examination of the need for non-B class uses. A Commentary on Employment Sites (2012) provides details of each saved Local Plan allocation and a commentary as to whether each site remains suitable for employment use.

3.18 Taking into account the Sustainability Assessment for Land Development (SALD) scores and the Core Strategy's approach to the distribution of employment land, nine sites are identified as initial priority sites for employment uses, although some of these have the benefit of extant planning permission. Details of each employment allocation are set out before the housing allocations in each section of this Plan. A summary is included in the table below:

Site	Location	Employment Use	Amount of floorspace (sq m)	Section of this Plan
St. James's Area	Dover	Retail	10,500	Saved Local Plan Policy AS9
White Cliffs Business Park	Dover	Focus on B1/B2/B8	53,000 in addition to unimplemented planning consents of 71,800	Dover - Policy LA1
Albert Road	Deal	B1/B2	4,550	Saved Local Plan Policy LE5
Aylesham Development Area (employment allocation)	Aylesham	B1/B2	8,000	Saved Local Plan Policy AY4
Betteshanger Colliery Pithead	Deal	B1/B2/B8	22,000	Saved Local Plan Policy AS1
Eastray Hospital	Eastray	B1 and employment generating uses	2,000	Rural - Policy LA22

Table 3.2 Distribution and type of employment allocations across the District.

Discovery Park Enterprise Zone

3.19 Discovery Park Enterprise Zone, formerly Pfizer's Research and Development facility, at Sandwich has an established employment function. Having achieved Enterprise Zone status in 2011, the site offers business rate discounts, has the potential for improved superfast broadband and future capital allowances to investors and occupiers on site. The planning mechanism for implementing an Enterprise Zone at Discovery Park is a Local Development Order (LDO). A LDO is intended to encourage new start-up businesses and other investors with simplified planning rules.

3.20 The LDO will remove the need to make planning applications for development of the site. This will provide a clear framework for business development making it easier to achieve economic growth. Similarly it is expected that the LDO will cover change of uses without the need for planning applications. Maximum flexibility in the use of buildings and land for employment purposes will be encouraged.

3.1 Dover

3.21 Dover town centre contains the principal convenience and comparison shopping offer with some residential and office space. The medieval street pattern of the town centre is mostly visible in the town centre until it reaches Townwall Street which severs the town

centre from the seafront. The architecture of the town centre is predominantly Victorian and Edwardian. Although there has been post war infill and some more recent development such as Dover Discovery Centre and the new Dover Sea Sport Centre. The docks have their own industrial maritime character with large areas of hard standing enclosing significant water bodies.

Urban grain and structure

3.22 Dover is located in an exceptional and defining setting and has an extremely clear urban structure and grain. It has a dominant north-south spine following the River Dour and east-west valleys branching off the spine. A significant proportion of the countryside which surrounds existing development, particularly to the west, is protected as AONB. Key heritage assets are in the town centre and on the flanking cliff tops. The Western Height fortifications and Dover Castle are the main landmarks, they play an important role in legibility and wayfinding and are key to Dover's urban identity.

Core Strategy

3.23 The Core Strategy identified that there needed to be a significant amount of change to Dover town centre. This is focused on the need to reinforce and restore the function and character of the town centre alongside the planned housing development at Whitfield and Connaught Barracks.

3.24 Whilst Dover has been identified in the Core Strategy as the main focus for action, it is also where there is most potential for transformation. The Core Strategy set a number of key objectives for the regeneration of the town:

- attract working age families to support growth in the economy;
- increase the attractiveness, making Dover a place to live, work, visit, shop and spend leisure time;
- improve the housing market perception and housing offer;
- improve the ease of, and reduce the need to, travel; and
- protect and enhance the historic environment whilst supporting regeneration.

3.25 In order to increase the attractiveness and address the under-performance of the town, there are a number of proposals identified in the Core Strategy that would directly assist with the regeneration of Dover:

- Redevelopment of the St James's area just north of Townwall Street for new retail development and a hotel that will enhance the retail offer and appeal in the town centre. Since the Core Strategy was adopted 10,500 square metres of A1 has been granted planning permission at St.James's area along with a new hotel on the corner on Woolcomber Street and Townwall Street.
- The Mid Town area, which is a strategic allocation in the Core Strategy (Policy CP9), has been identified as being suitable for a mixed use development that will assist with improving the educational provision in Dover.
- Dover Waterfront, which is a strategic allocation in the Core Strategy (Policy CP8), has been identified as being suitable for a mixed use waterfront scheme including retail, restaurants, cafes and drinking establishments, assembly and leisure, residential (at

least 300 homes), office and hotel uses. The intention is that it becomes a major attraction and modern day symbol for Dover

- Terminal 2 - a new ferry terminal and marina at the former Western Docks to cater for the forecast increase in traffic and maintain Port of Dover's leading role. A Harbour Revision Order has been granted for the Terminal 2.

3.26 The allocations that have been identified in this Plan will complement the above proposals and address the objectives that have been set out in the Core Strategy for Dover.

Town Centre Boundaries

3.27 The redevelopment of the St. James's Area will become an important anchor to the southern end of the High Street and help deliver significant improvements in the town centre. This will be further enhanced by the development of the Dover Waterfront area. Although the Retail Update (2012) has been based on a constant market share it is envisaged that these schemes will increase Dover's market share.

3.28 Due to the strategic importance of the proposals at Dover Waterfront, the town centre boundary has been amended to include the majority of the allocation (excluding the marina to the south of Townwall Street). The boundary has also been amended to include units fronting Snargate Street, an opportunity area for town centre uses which would complement the uses at Dover Waterfront. The change is illustrated in the diagram below.

Provision of infrastructure

3.29 The Core Strategy recognised that any physical planned changes to the town must be accompanied by the necessary infrastructure. The introduction of the High Speed 1 (HS1) service to London from Dover Priory Railway Station has dramatically reduced journey times to London to just 67 minutes. The commencement of this train service has provided a step-change in the accessibility of Dover to London and is a positive way to address the town's peripheral location in the south east.

3.30 The need for a fast and reliable express public transport system to increase accessibility and reduce the number of trips made by private car was a key component of the Dover Transport Strategy and the Core Strategy. This is being delivered by proposals for a Bus Rapid Transit (BRT) which will provide a public transport connection from the planned urban extension at Whitfield, White Cliffs Business Park via Connaught Barracks/ DoverCastle to the town centre and Dover Priory railway station. The potential route alignment between the roundabout on the WCBP to Connaught Barracks has been developed with the assistance of KCC.

3.31 The need to enhance opportunities for walking and cycling as viable and effective means of transport between key parts of Dover is being taken forward by Kent County Council's River Dour Greenway project, which aims to provide an important 'backbone' that will improve links across Dover town. Furthermore, the River Dour Greenway will link in to local and national cycle networks (NCN) such as NCN Route 1 and NCN Route 2.

3.32 In order to strengthen the proposals for green infrastructure network in the AONB, especially in the chalk grassland around Dover, Interreg funding has been secured, through the Heritage Lottery Fund, to develop a Landscape Conservation Action Plan. The focus of the Action Plan is to understand the landscape characteristics and heritage assets and create a positive action plan that can be taken forward to improve the landscape.

Purpose of housing provision

3.33 The Core Strategy identified that the 'dominant housing provision purpose' in Dover is to 'Create' and 'Restore' with the aim to:

- re-balance the stock away from traditional small scale terrace housing;
- improve quality of appearance and standards of sustainable construction;
- provide family housing but also cater for an ageing population;
- improve environment and housing standards of areas with low quality issues; and
- improve overall market appeal and image.

3.34 The design of the housing will have a leading role in shaping the new market that is to be created in a way that addresses the existing housing deficiencies identified in the Core Strategy. Proposals must introduce a quality that is currently missing to enhance the market perception and appeal of Dover.

3.35 The Strategic Allocations identified in the Core Strategy have a major role to play in creating a new housing offer. The three allocations that have a key role in this Plan which are aimed at creating and restoring the character of Dover where specific design guidance will apply are as follows:

- White Cliffs Business Park – Dover's flagship enterprise zone and business park (see Policy LA1)
- Town Centre and Waterfront – to strengthen the historic town centre and retail core addressing the seafront and mixed-use redevelopment of Wellington Docks (Charlton Sorting Office – Policy LA2, Albany Place – Policy LA3 and Dover Waterfront Core Strategy Policy CP8)
- Coombe Valley - residential and industrial area undergoing regeneration and possible redevelopment of Buckland Hospital (see Policy LA7)

3.36 The above proposals will need to incorporate landmark features, foreground buildings, vistas and focal points.

3.37 Where the focus is to 'restore' and 're-balance' the housing stock, the main purpose of allocating sites is to improve the general quality and appearance of Dover. Elsewhere all other site allocations should ensure that the design aims to restore existing character and urban form.

Areas of change

3.38 In Dover there are parts of the town that are either in need of renewal, or that do not fulfil their potential but where proposals are not sufficiently advanced in order to justify a specific allocation in this Plan. These areas are identified as 'Areas of Change' - further detail are provided in section 3.1.1.

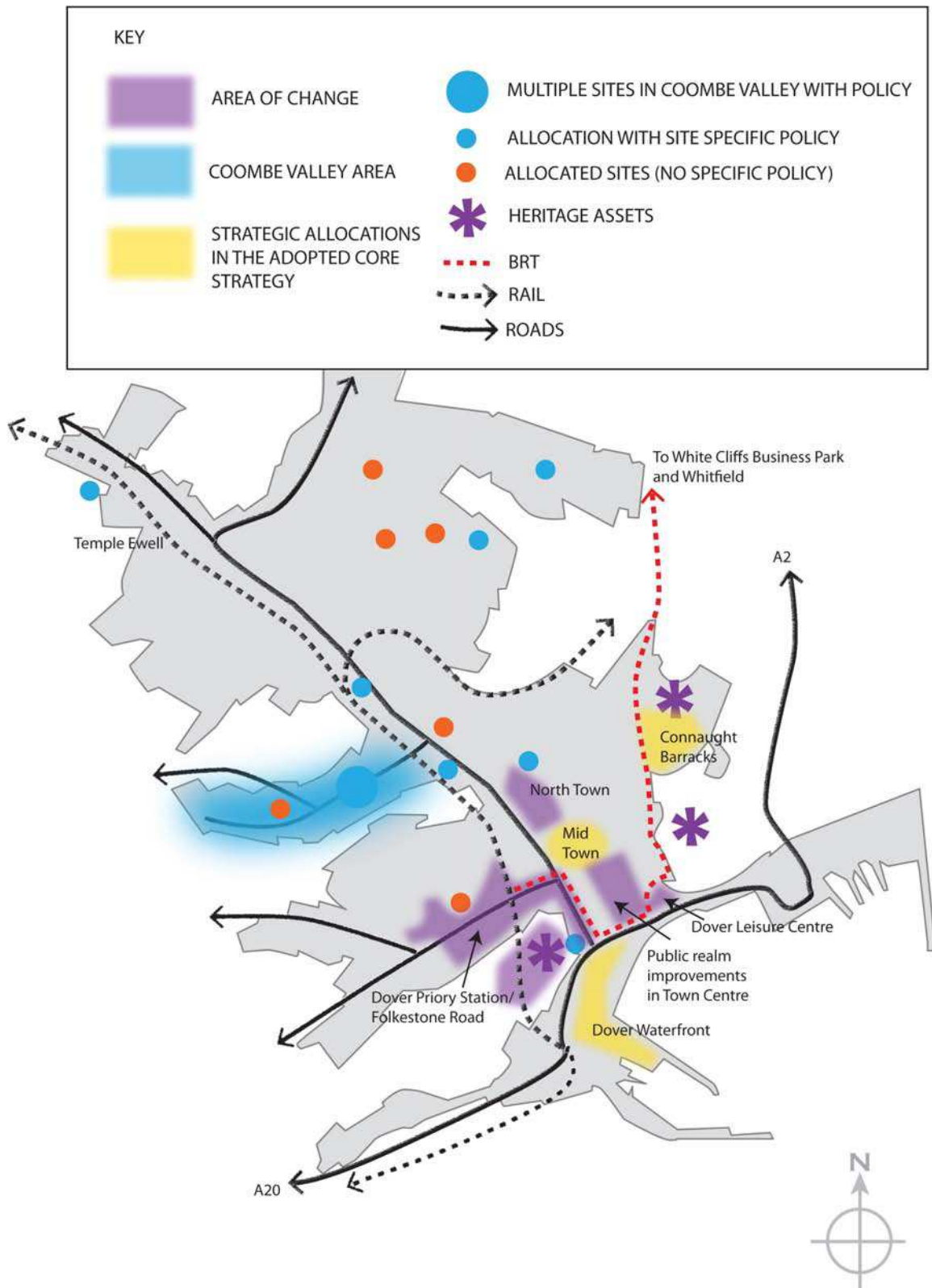


Figure 3.1 Diagram illustrating the Areas of Change and development sites in Dover

Employment

3.39 This section sets out the employment land allocation at Dover for White Cliffs Business Park (WCBP), prior to detailing the housing allocations.

White Cliffs Business Park

Site location and characteristics

3.40 WCBP is located to the north of Dover Town, immediately to the south of Whitfield and the managed neighbourhood expansion area. It is adjacent to the A2 and its primary access is from the Whitfield roundabout. WCBP is the premier location in the District for future employment generation as it is conveniently located in terms of its proximity to national trunk roads and the port. Phase I of the WCBP is now largely complete which demonstrates that there is a demand for additional high quality employment space in Dover. Although parts of the site have the benefit of extant planning permission, the majority of Phases II and III comprise agricultural land.

Site context

3.41 Phase II of the WCBP is open to long views from the north and west and is readily seen from the A2. Owing to the topography of Dover, development may be visible from a considerable distance. Phase III of the WCBP is also open to views, especially from the west. To the east of Phase III lies residential properties on Dover Road, and to the west of Phase I is Old Park Barracks, an employment area primarily for port-related activities.

3.42 A new spine road connecting to the A256 to the north east formed part of Phase II. The granting of planning permission was treated as a departure to the policy and proposals in the District Local Plan as it involved the introduction of bulky goods retail on Phase II of the WCBP. This financed the new spine road, off the grade-separated junction on the A2, which has opened up Phase II and Phase III. Existing unimplemented planning consents, throughout all phases of the Business Park, but predominately Phase II, amount to 79,800 square metres.

Proposed development

3.43 Phase II and Phase III are suitable for Use Classes B1, B2 and B8. The Employment Update recommends consideration of other employment uses subject to assessment in terms of their contribution to sustainable development. This should be restricted to other employment generating uses that are not specified in the Use Class Order. This reflects the town centre first approach, as set out in the NPPF. Access to Phases II and III will be via the new access road off the grade-separated interchange with the A2.

3.44 The BRT route will serve WCBP, with a number of stops envisaged throughout the main spine road. To encourage patronage from employees it is important that proposed development is designed to ensure that pedestrian routes to each BRT stop are clearly defined, safe, well-lit and subject to natural surveillance. This key objective should form part of any design proposal in any subsequent proposals for the WCBP. A key component of ensuring new development promotes legibility, natural surveillance, and way finding is through the orientation of buildings which should front the main spine road.

3.45 The North Downs Way falls within Phase II and separates it from Phase III. The access road from Phase II to Phase III will breach the North Downs Way. Along the remainder of the North Downs Way the existing hedgerow must be retained and strengthened by structural planting. Any development must be set back from the new planting to preserve its setting and integrity.

3.46 A shelter belt consisting of dense native planting will be required along the southern boundary. Phase III of the site adjoins housing on Dover Road. The amenities of residents in this area will be protected by establishing a landscape buffer at least 25 metres wide consisting of earth bunding and dense native planting, and allowing only B1 development at low density in this location. The remaining land, without the benefit of planning permission, has the potential for some 53,000 square metres of floorspace.

Policy LA 1

White Cliffs Business Park

Planning permission for Phases II and III of the White Cliffs Business Park (as defined on the Proposals Map) will be permitted provided:

- i. development is for Use Classes B1/B2/B8, with the exception of employment generating uses that are not specified in the Use Class Order;
- ii. development should front the main spine road and include clear and safe pedestrian routes to BRT/bus stops;
- iii. vehicular access is restricted to a grade-separated interchange with the A2, with the exception of emergency access from Phase III to Dover Road unless or until it can be adequately demonstrated that an unrestricted access will not materially affect the safe, efficient operation and environmental qualities of the road network in the area and Melbourne Avenue in particular;
- iv. with the exception of providing the access to Phase III, the integrity and setting of the North Downs Way is preserved by retaining the existing hedgerow, strengthening by additional planting of three metres either side of the North Downs Way, and setting back development 10 metres from the new planting;
- v. structural landscaping is included for the sites' main boundaries;

Additionally, in the case of Phase II:

- vi. vehicular access and servicing extends up to the boundary with Phase III;
- vii. a shelter belt at least 20 metres wide along the southern boundary is provided;
- viii. no building is constructed within 15 metres of the shelter belt; and
- ix. no building constructed within 50 metres of the shelter belt exceeds 10 metres in height.

Additionally, in the case of Phase III:-

- x. a landscaped buffer zone at least 25 metres wide in the vicinity of Dover Road is provided; and
- xi. development adjacent to the buffer zone is Use Class B1 only and does not exceed 10 metres in height.

Residential

3.47 Twelve sites have been identified for residential development, which will provide approximately 776 dwellings. A number of sites within the Coombe Valley area have been identified for residential redevelopment; combined with the twelve sites 1,006 dwellings will be provided. The allocated sites and Coombe Valley area are identified in the diagrammatic plan below and the following table. 1062

Land Allocated for Residential Development at Dover			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Charlton Sorting Office, Charlton Green (LDF06)	Restore and improve an area's housing offer where it is in decline or stress	65	Set out in Policy LA2
Albany Place Car Park (SHL037)	Restore and improve an area's housing offer where it is in decline or stress	15	Set out in Policy LA3
Manor View Nursery, Lower Road, Temple Ewell (SHL050)	Reinforce but not change an area's housing offer	25	Set out in Policy LA4
Adjacent to the Former Melbourne County Primary School (SHL062)	Reinforce but not change an area's housing offer	10	Set out in Policy LA5
Former TA Centre, London Road (NS16DOV)	Reinforce but not change an area's housing offer	10	Set out in Policy LA6
Coombe Valley area	Restore and improve an area's housing offer where it is in decline or stress	230	Set out in Policy LA7
Buckland Mill (LDF030)	Restore and improve an area's housing offer where it is in decline or stress	265	Set out in Policy LA8
Other Allocations/Changes to Confines			
Site : Land off Dunedin Drive (SHL079)	Reinforce but not change an area's housing offer	8	Landscaping

Land Allocated for Residential Development at Dover			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Site : Factory Building, Lorne Road (LDF08)	Restore and improve an area's housing offer where it is in decline or stress	8	Flooding
Site : Land off Wycherley Crescent (NS08DOV)	Reinforce but not change an area's housing offer	10	Topography, frontage only
Site : Old Park, Old Park Hill (SHL070)	Reinforce but not change an area's housing offer	40	
Site : Westmount College, Folkestone Road (LDF037)	Restore and improve an area's housing offer where it is in decline or stress	100	
Site : Barwick Road, Coombe Valley (LDF036)	Restore and improve an area's housing offer where it is in decline or stress	220	

Land Allocated for Residential Development at Dover			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Approximate total number of dwellings		1006	

Table 3.3 Summary Table

Charlton Sorting Office, Charlton Green

Site location and characteristics

3.48 The site occupies a prominent location on the corner of Frith Road and Charlton Green and has an area of 0.69 hectares. It consists of an existing two storey building that was previously used as the main Royal Mail sorting office. It is currently being used as a training centre, offices and has a gym on site.

Site context

3.49 To the west of Charlton Green, on the opposite side of the road, is the River Dour and an edge-of-centre retail area. To the north is a residential development that fronts Frith Road. The surrounding area comprises predominately traditional small-scale terraced properties with on-street parking. The rear gardens of residential properties that are located on Salisbury Road immediately adjoin the north east boundary of the site. These are elevated, which means that they overlook the site.

3.50 Whilst the site is located on the opposite side of the road to an existing edge-of-centre retail area, it is not considered that this site would be appropriate for future retail development. This is on the grounds that this would work against the Council's ambition to concentrate and strengthen the existing core of the town centre towards St. James's and Dover Waterfront.

Proposed development

3.51 The site offers an opportunity to create and restore the housing offer in the area. It lies on the edge of a predominately residential development and it is within walking distance of the town centre, as such it is considered to be more suitable for residential development. Redevelopment should achieve an improvement in the quality of appearance, standards of sustainable construction and overall environmental improvements in this edge-of-centre area.

3.52 The site occupies a prominent position and would lend itself to a frontage development with a strong design facing Charlton Green, Frith Road and Salisbury Road. A landmark building should feature at the junction of Frith Road and Charlton Green and the design must ensure visual interest is created at the junction of Salisbury Road and Frith Road. Overall, development should be at a scale appropriate to the surrounding properties, with the provision of car parking to the rear - located adjacent to the rear gardens of properties on Salisbury Road. The housing mix should be in line with the SH1065 and there is an opportunity to provide

both houses and flatted development to improve the overall market appeal and image of the area. Due to the proximity of a signalised junction and on-street parking, access should be from Charlton Green. The site is estimated to have the capacity to accommodate 65 dwellings.

Policy LA 2

Charlton Sorting Office, Charlton Green

Planning permission for residential development at Charlton Sorting Office, Charlton Green (as defined on the Proposals Map) will be permitted provided that the design and layout reflects the site's prominent location.

Albany Place Car Park

Site location

3.53 The site is located to the west of York Street and is situated on rising ground lying immediately below Western Heights. It is located close to the town centre and has spectacular views of Dover Castle.

Site characteristics

3.54 The site is currently in operation as a public car park, which is split into three separate sections providing approximately 90 parking spaces. The largest car park is located on a slope, the highest part being the western boundary; as a consequence of the topography, the upper windows of terraced housing located on the southern boundary are at head height. All three car parking areas are floodlit.

Site context

3.55 The site is bounded to the south, east and north by residential properties. The western boundary is enclosed by a stone wall, and beyond lies Cowgate Cemetery. Between the stone wall and the cemetery is a raised footpath which overlooks the western portion of the car park. Land to the north and west is located within the Western Heights Conservation Area. The site lies at the bottom of the main pedestrian access (via steps) to the Drop Redoubt and Western Heights. The area is very sensitive for archaeology, as it adjoins the Western Heights fortifications, Roman lighthouse and medieval chapel, and a Scheduled Monument. Part of the Roman fort of the Classis Britannica lies within the site, and is mainly sited below Albany House to the north.

3.56 The surrounding area comprises predominately small-scale terraced properties and retirement flats. This site offers a unique opportunity for redevelopment that maximises the views of Dover Castle and the port. The site would be suitable for a range of dwelling sizes, including both family housing and larger flatted development.

Proposed development

3.57 Development of the site must have regard to its setting, and the diagram below sets out the constraints and opportunities presented by the site. The diagram divides the site into three blocks:

- Block A would continue development in line with the almshouses; shared car parking could be provided to the front of the properties, and back gardens to the rear (west)
- Block B would be retained as a public car park (with approximately 18 spaces). This block would not be suitable for redevelopment due to the elevated public footpath and the need to retain car parking for visitors to Western Heights. Overall improvement of the environment could result in an increase in the number of visitors to Western Heights from this key entrance.
- Block C would comprise two areas of development; the first would continue the line of development in line with Albany House. This block should not exceed 2.5 storeys in height. This should front Albany Place, and provide rear private gardens to the east to reduce overlooking from adjacent properties. The second area of development, to the west, would comprise predominately flatted development. Development would need to front Albany Place to both the west and north following the curvature of the road, and offers an opportunity to create a foreground building although this should not exceed 2.5 storeys in height. Between blocks two and three there would be an opportunity to provide a shared parking area. Since the site is located in the town centre, sustainable forms of transport should be encouraged, and there is an opportunity for a reduced amount of car parking on site.

3.58 There is an opportunity for a higher density scheme reflective of the location, and based on 40dph the number of dwellings would be approximately 15.

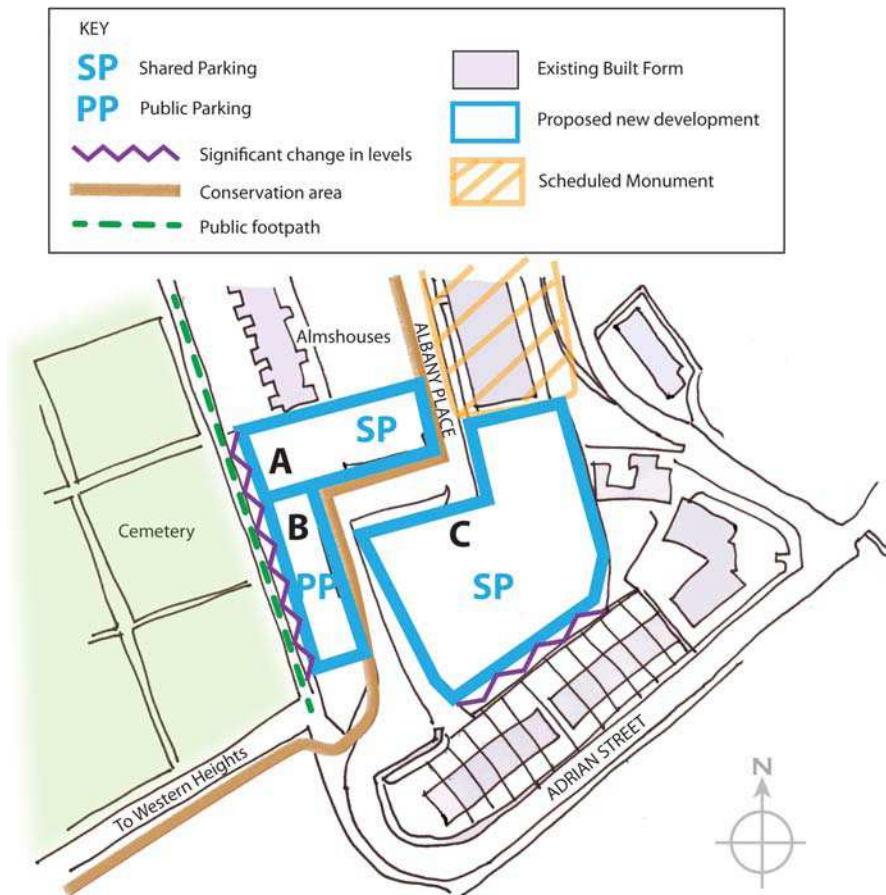


Figure 3.2 Opportunities and Constraints

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Policy LA 3

Albany Place Car Park

Planning permission for residential development at Albany Place Car Park (as defined on the Proposals Map) will be permitted provided that part of the site adjacent to the Cowgate Cemetery Wall (annotated on the diagram as Block B), is retained as a public car park

Land at Manor View Nursery, Lower Road, Temple Ewell

Site location and characteristics

3.59 The site is located immediately adjacent to the railway line (and a raised viaduct), and is currently occupied by a plant nursery. This comprises a main nursery building, together with a number of glasshouses. The remaining part of the site is open countryside, which bounds the AONB to the west.

Site context

3.60 The surrounding area comprises residential properties to the east and, beyond the railway line, to the north. The site is adjacent to the AONB, the boundary of which lies some 55m to the west. Undeveloped countryside lies to the south.

Proposed development

3.61 The site is only suitable to be partly developed as it is in close proximity to the boundary of the AONB, and any development would affect this setting. A non-residential landscape buffer would be required and the density would need to be reduced to maintain a soft urban edge. This should be approximately 20 metres wide, and comprise grassland with additional planting to the western boundary to screen the development. Furthermore, in order to reduce the impact on the setting of the AONB building heights need to be restricted to no more than two storeys. The site is estimated to have the capacity to accommodate 25 dwellings.

Policy LA 4

Land at Manor View Nursery, Lower Road, Temple Ewell

Planning permission for residential development on Land at Manor View Nursery, Lower Road, Temple Ewell (as defined on the Proposals Map) will be permitted provided that:

- i. a landscape buffer, of approximately 20 metres, is provided with the western boundary to reduce impact on the AONB; and
- ii. development does not exceed two storeys in height.

Land adjacent to the Former Melbourne County Primary School

Site location and characteristics

3.62 The site is triangular in shape and is located to the north of KCC offices, which occupy the former primary school buildings. There is no direct vehicular access to the site; however, subject to the necessary consents, access would be achievable through utilising the existing access to KCC offices. At present, the entire site has extensive tree cover.

Site context

3.63 The site abuts the Whitfield Down and Buckland Down LWS, designated for chalk grassland. In this general area the grassland has succeeded to chalk scrub and this appears to be the case for the site which shows no significant change in plant community structure from the adjacent LWS. Therefore, at present the site acts as a supplement to the LWS. To the east of the site lies existing residential properties, which front Melbourne Avenue, and to the west of the site further undeveloped land is located, again with significant tree coverage. The KCC offices are located to the south.

Proposed development

3.64 The site is considered suitable for development subject to biodiversity offsetting, whereby the adjacent LWS is brought back into management in exchange for the loss of this site to development. This should be in the form of a financial contribution, to be determined in discussion with DDC and the White Cliffs Countryside Partnership. The site is estimated to have the capacity to accommodate 10 dwellings.

Policy LA 5

Land adjacent to the Former Melbourne County Primary School

Planning permission for residential development on land adjacent to the Former Melbourne County Primary School (as defined on the Proposals Map) will be permitted provided that a financial contribution is sought to enable biodiversity offsetting

Former TA Centre, London Road

Site location and characteristics

3.65 The site is located in central Dover between two parallel roads, George Street (effectively a narrow service road) and London Road (the A256). There are three buildings on site; one large 'L' shaped building fronting London Road, which is of a modern appearance and two smaller outbuildings located to the side and rear of the site. The central part of the site comprises hard standing.

Site context

3.66 Mature trees are located in the southern corner and along the south western and south eastern boundaries. There is a historic wall, considered to be a Heritage Asset, to the rear of the site (south western boundary) along George Street. The road sits considerably higher than the site, which is at a lower level. The site is located within a predominately residential area, with terraced properties beyond the site on all sides. The terraced properties to the north west and south east are Listed, and the latter are also located within the Conservation Area.

Proposed development

3.67 The site offers an opportunity to create and restore the housing offer in the area. It lies within a residential area and it is within walking distance of the town centre. New development should front London Road, creating foreground building(s). The historic wall must be retained, together with a sufficient number of trees to avoid compromising both the London Road street scene and the outlook from properties on George Street. The site is estimated to have the capacity to accommodate 10 dwellings.

Policy LA 6

Former TA Centre, London Road

Planning permission for residential development on the Former TA Centre, London Road (as defined on the Proposals Map) will be permitted provided that:

- i. any development fronts London Road; and
- ii. a reasonable number of trees are retained in order to screen properties on George Street

Land in Coombe Valley

Site location and characteristics

3.68 Coombe Valley is located to the north west of Dover, located within a valley floor which extends in a westerly direction. The area is characterised by a mixture of residential development and industrial uses set against the backdrop of the AONB. Development continues onto the sides of the valley and as a consequence the topography of the area restricts the development potential. Coombe Valley is a mixed use area, with industrial and business areas located at the entrance to the Valley and at the westerly tip of development, which is included within the AONB. These employment areas make a valuable contribution to the local economy, providing a range of small to medium sized employment premises for a number of businesses.

3.69 Coombe Valley comprises a mix of housing in terms of size, period and tenure. Along Coombe Valley Road are typical back to back terraces dating from the Victorian period, whilst further into the valley slopes are newer semi-detached or terraced properties with narrow streets. A large proportion of the properties are social rented. It is the District's most deprived ward and part of the ward falls within the country's top 10% of most deprived wards nationally.

Site context

3.70 Coombe Valley Road is characterised by a Gas Holder, previously developed land and a generally poor quality urban environment which is in need of improvement and regeneration. Published guidance by the Health and Safety Executive (HSE) sets out certain restrictions for development in close proximity to the Gas Holder. There are three zones - Inner Zone, Middle Zone and Outer Zone - each with recommended development types and densities (Figure 3.3).

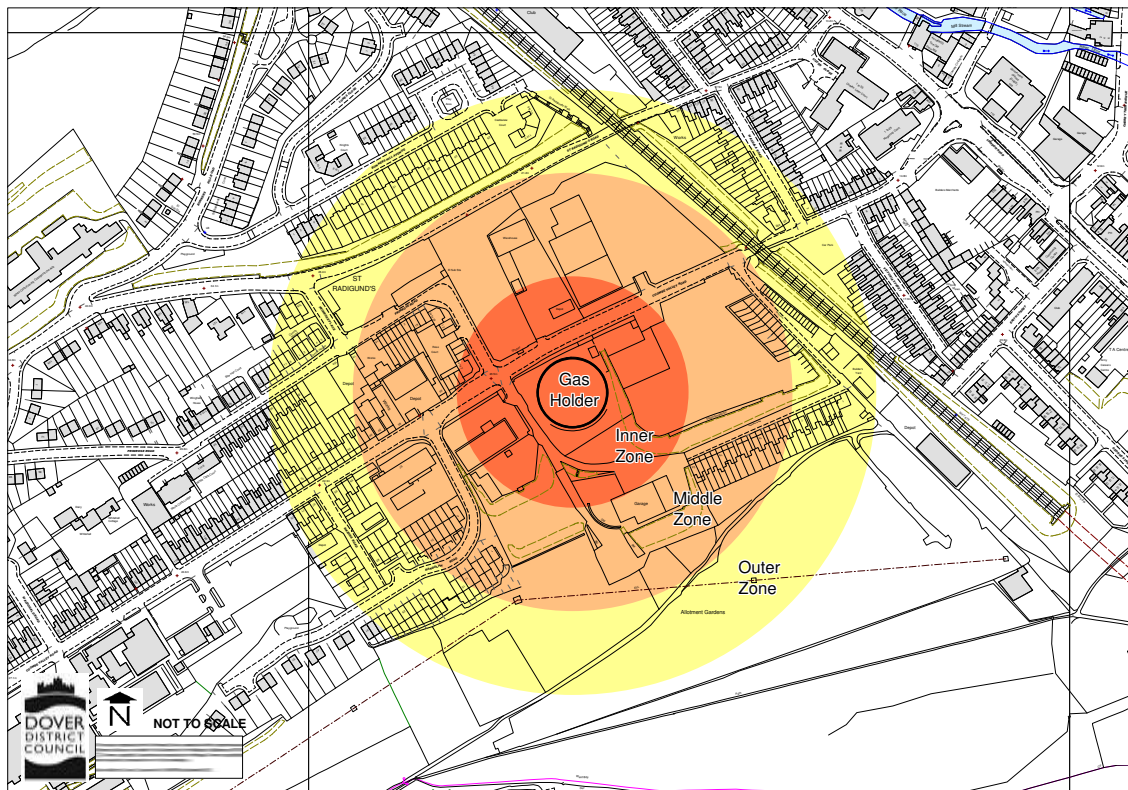


Figure 3.3 HSE Zones

3.71 There are issues in connection with the current access to the area, which is via a signal controlled single carriageway under the railway bridge. This acts as both a visual and physical barrier segregating the area from the rest of Dover which has created a feeling of isolation. Coombe Valley Road acts as the primary movement route through the area, but there are issues in relation to its layout, the management of traffic, safety and appearance. There is an opportunity to improve and regenerate this generally poor quality urban environment using an alternative access under the railway line on St. Radigund's Road.

3.72 Triangles Community Centre and Kidease nursery provide valuable community facilities and both are located just within the business/industrial area to the west of the valley. There is also a Primary School, shops, a takeaway and a number of gymnasiums. The area is in close proximity to London Road where there are a significant number of services including a selection of shops and takeaways. There are frequent bus services to the town centre and beyond. The landscape surrounding the built area is steep in places, and connections to this publicly accessible green space should be enhanced.

Proposed development

3.73 The Stage 1 Coombe Valley Regeneration Initiative identified the need to create a gateway feature, which may include some form of landmark and should be located immediately after the railway bridge. Future residential development sites should enhance the current mix of housing in the area, providing family housing. Whilst there are a number of local services within the area, if future residential development sites come forward at the scale envisaged it will be necessary to enhance and expand these ideally forming a new heart to the valley. Access to open space and the existing recreation facilities should be improved.

3.74 Buckland Hospital is located immediately adjacent to Coombe Valley Road and midway down the valley. Although the Hospital does not have an Accident and Emergency Department it is a valued local service amongst residents. The redevelopment of the car park for a new hospital would enable part of the site, which is currently occupied by the hospital, to be released for residential development. The opportunity exists to create a new civic square as part of the redevelopment of the hospital. In total, and taking account of the potential of the hospital site, approximately 230 residential dwellings could be developed, spread over 7 sites.

Policy LA 7

Land in Coombe Valley

Planning permission for residential development on sites within the Coombe Valley area (as defined on the Proposals Map) will be permitted provided that:

- i. the mix of dwellings should include family housing;
- ii. development seeks to maximise the use of available land, at a minimum of 40dph; and
- iii. early consultation is undertaken with the Health and Safety Executive (HSE) for any sites in located in Figure 3.3.

3.75 In addition, land at Barwick Road at the western edge of the Coombe Valley area is allocated separately (see Table 3.3).

Buckland Mill

Site location and characteristics

3.76 Buckland Mill is located some 1.5km north west of Dover town centre. In 2002 SEEDA acquired the site and cleared many of the buildings on site. Those with historic merit were retained, and the River Dour, which flows through the site (north to south), was de-culverted. The clock tower, which is located on the side of the main mill building fronting Crabble Hill, is an important local landmark. This building wraps around the north and eastern boundary of the site which fronts Crabble Hill. To the west of this building is Buckland House, which is Grade II Listed. The main vehicular access to the site is located at the western end of the Crabble Hill frontage; this is ramped to accommodate the changes in the land levels between the site and Crabble Hill.

Site context

3.77 Buckland Mill occupies an important and prominent location within a predominately residential area. The site covers nearly four hectares and is bounded to the north east by Crabble Hill. To the north is a heavily treed railway embankment; providing an attractive visual backdrop to the site. The southern/south-western boundary is Crabble Meadows, a narrow lane that can be accessed from Crabble Hill at the southeastern end of the site. Crabble Meadows provides pedestrian access to St. Andrew's Church, a Listed Building, the adjoining graveyard and Crabble Athletic Ground.

3.78 Supplementary Planning Guidance has been adopted by the Council in 2003 for the redevelopment of this site and this will be used as a material consideration when determining planning applications www.dover.gov.uk/forwardplanning/bucklandmill/home.asp.

3.79 Approximately one third of the site has the benefit of full planning permission for a mixed use scheme, including up to 141 dwellings, A1 retail, a 'community hub' and B1 offices within the converted Buckland House. The scheme includes a series of public spaces and the formation of a new vehicle access to the north west of the mill building, from Crabble Hill. A landscaped 'wetland', located between the mill and river, provides ecological interest and flood storage. Development is underway, having begun with the conversion of Buckland House and a new residential block to the east. Work has yet to begin on the main mill building.

Proposed development

3.80 In terms of quality and design it is important that the development is laid out carefully to complement the landmark former mill building along Crabble Hill, and the Grade II Listed Buckland House and neighbouring St Andrew's Church. The site's prominent location makes it appropriate to incorporate foreground buildings that do not detract from the views of the Church and Dover Castle. Residential development should be designed to maximise and take full advantage of the site's riverside location. Development should be designed to face the river but be set back to allow for the creation of a riverside walk and landscaping with public access.

3.81 The development will be open to views from Crabble Meadows and in order to increase overlooking it is important that development addresses and responds to this important public footway. The approach towards the public realm provision will be heavily shaped by the River and flood risk, as land raising and flood compensation and mitigation measures will be required. This needs consideration but should not compromise fundamental design issues. A Design Code should establish design parameters, and be submitted with any planning application, to guide the future phases of development. There is an opportunity to use tree planting to improve legibility and define 'place'.

3.82 The layout will need to be designed so that it is not used as a through route for drivers wishing to avoid the traffic signals at the junction of London Road/Crabble Hill. The main access into the site should be from Crabble Hill. Opportunity must be made by the developer to provide for access to and from the site by cycle, foot and public transport. In particular, the creation of segregated cycle lane along the existing pedestrian footway/road and the creation of a pedestrian route alongside the River Dour. The site has the potential to accommodate up to a further 265 dwellings.

Policy LA 8

Buckland Mill

Planning permission for residential development at Buckland Mill, Crabble Hill (as defined on the Proposals Map) will be permitted provided that a comprehensive scheme for the site is prepared where:-

- i. a Design Code must be submitted as part of any outline planning application;
- ii. the development is designed to reflect the site's important location and preserves the setting of the Listed Buildings and the adjacent St. Andrew's Church;
- iii. environmental improvements, including a riverside walk and a cycleway that are accessible to the general public, are incorporated into the layout of the site;
- iv. buildings are designed so that they front the river and have been designed in a manner that includes mitigation measures to reduce the risk of flooding and allows public access along the river frontage;
- v. vehicular access to the site is achieved from the existing access roads off Crabble Hill; and
- vi. opportunities must be made by the developer to provide for access to and from the site by cycle, foot and public transport.

St James's Area

The redevelopment of the St. James's Area for a mixed use scheme including B1 employment, retail, residential, leisure and tourism uses is covered by Saved Local Plan Policy AS9.

3.1.1 Areas of Change

3.83 In Dover there are parts of the town that are either in need of renewal or do not fulfil their potential but where proposals are not yet sufficiently advanced to justify a site specific allocation in this Plan. It is nevertheless important that they are identified in order to focus attention on them and act as a catalyst for preparation of private development proposals and/or public sector initiatives. These have been identified in the Plan as 'Areas of Change':

- Public Realm improvements to key parts of Dover Town centre;
- Dover Priory Railway Station and the Folkestone Road area;
- Western Heights;
- North Town; and
- Dover Leisure Centre.

These Areas of Change are identified on Figure 31075

3.84 The Public Realm Strategy identified a number of priority projects that are of direct relevance to the Areas of Change:

- York Street;
- Market Square;
- Station Approach; and
- River Dour.

3.85 The Dover Masterplan (2006) developed the projects that were identified in the Public Realm Strategy into options and proposals under four development themes which focused on celebrating the:

- shopping centre as the heart of the town;
- River Dour;
- local topography and key views; and
- history of the town.

3.86 The opportunities and priorities that have been identified in both of these documents have been used as the context for the Areas of Change. The broad objectives that have been included in each of the Areas of Change are based on the Core Strategy urban design framework. The objectives will be used as a starting point should any re-development proposals come forward.

Public Realm improvements to key parts of Dover Town Centre

3.87 Dover town centre is the historic core of the town since Roman times. The Core Strategy has identified that there needs to be a significant amount of change to Dover town centre which includes improving the quality of the public realm areas, the River Dour and proposals to link together individual parts of the town centre.

3.88 In the case of Dover town centre, the focus is to 'Create and Restore' which will help to support the strategic allocations that have been identified in the Adopted Core Strategy (Dover Waterfront, Mid Town, Connaught Barracks and the managed expansion of Whitfield). Market Square and Pencester Gardens are the two main formal open spaces each defined by buildings of different periods and styles and mixed quality. Many of the buildings in and around Market square are in good condition and are of appropriate grand scale although there are equally a number of buildings that are not of the same architectural merit for this important civic space. The Market Square is also important for the town centre as it offers a key pedestrian link to the St.James's area which will support and complement the retail appeal of the town centre.

3.89 Pencester Gardens are enclosed by buildings, Pencester Road and the Stembrook public car park. Pencester Road is a one-way street used by buses and general traffic and has bus stops located on the southern side of Pencester Road adjacent to the Gardens. The landscape quality and the edges around the Gardens are not very well defined and in need of improvement. The Gardens include a bandstand, DDC strategic play area and a

skate park, which are important recreational assets in the heart of the town centre. The River Dour is currently an underplayed structural feature of the town which flows through Pencester Gardens and the heart of the town centre.

3.90 Market Square has been identified in the Public Realm Strategy as requiring public realm improvements of a suitable scale to reflect the space's important civic function and make the best of use of key views of a number of important historic assets. In order for Market Square to become a focal point and to reinforce its important civic function, an opportunity exists to create an arts or lighting strategy that will strengthen and improve this existing public open space.

3.91 The overall quality and appearance of Pencester Gardens could be enhanced through the creation of a high profile formal garden in the centre of Dover integrating current uses, recreation and leisure and existing site features (bandstand). Any proposal should include high quality soft and hard landscaping, improved lighting, quality seating and possibly perimeter fencing/walling to define and secure the site. This could offer the opportunity to create high quality gardens that embrace the presence of the River, improve water quality, wildlife and a high quality pedestrian/cycle link to Dover Waterfront. Dover Greenway (cycle route) through Pencester Gardens will be delivered by March 2013.

3.92 In order to improve connectivity and attractiveness of the existing bus service, a new bus interchange could be created on York Street as part of wider public realm improvements (see paragraph 3.99 - Dover Priory Railway Station and Folkestone Road area). A bus interchange on York Street would assist with the regeneration of the town centre and provide a focal point for public transport in the town and allow other public realm improvements to take place in Pencester Road.

Broad Objectives:

- Support environmental and public realm improvements to Market Square which could involve the creation of a major work of art, whether environmental, sculptural or lighting that could act as a main focus to connect Market Square with the St. James's site;
- Incorporate foreground buildings, vistas, focal points, public spaces and measures to improve pedestrian legibility that makes the most out of Pencester Gardens, River Dour and views of the heritage assets;
- Explore opportunities to create a dramatic axis to the Castle which currently extends from Market Square along Castle Street, through the use of lighting to emphasise this axis and restore what was once a lively commercial centre;
- Support initiatives that help to improve and restore the appearance of buildings, public open space and street furniture that make a positive visual contribution to the town centre;
- Support careful and integrated lighting and enhancements to the River Dour that create an active river frontage.

Dover Priory Railway Station and the Folkestone Road area

3.93 Dover Priory Railway Station is one of the gateways to Dover town and lies at the cross roads of a number of important locations in Dover; the residential and mixed use areas along Folkestone Road; the Tower Hamlets area and the town centre. The role and importance of Dover Priory Railway Station as a gateway has changed with the introduction of the High Speed 1 (HS1) service to London. This has reduced journey times by 30 minutes bringing Dover into a viable commuter time. The HS1 is an important component of the Core Strategy in attracting people to live and work in the District.

3.94 The station has undergone improvements as part of Interreg funding. Despite the recent and planned investment, the station is currently detached from the main retail centre and pedestrian links from the railway station along Folkestone Road to the town centre are not easy or convenient. Pedestrian links are complicated by the railway station's peripheral location as there are no clear views from the station to the town centre or seafront.

3.95 Car parking at the railway station is extremely restricted which means that the station is not capitalising on the benefits of the HS1 train service. For passengers disembarking at the railway station the Folkestone Road roundabout has been designed for vehicles rather than pedestrians wishing to access the town centre. The urban environment alongside York Street also acts as a very significant barrier between the town centre and the station.

3.96 Folkestone Road has a number of larger Victorian properties that have been converted to flats and studios apartments. The external appearance of a number of properties and gardens in this general area are also in a poor state of repair and detract from the general appearance of the town. To the west of the railway station, there is a disused warehouse, railway sidings and the H.M. Customs and Excise buildings which are enclosed by high security fences. Further along Folkestone Road is the former Westmount Adult Education College that is now boarded up following a fire. Overall there has been a general deterioration of the urban fabric and identity to this part of Dover and the whole area lacks a 'sense of arrival'. The focus for this Area of Change is, therefore, to 'Create and Restore'.

3.97 Whilst the HS1 has brought Dover into viable commuting time there are a number of opportunities in and around the railway station to:

- Increase the limited car parking that is currently available at the station;
- Improve connections to the town centre;
- Investigate the potential for further development to enhance and support the gateway role; and
- Enhance the general appearance of the area.

3.98 Land to the west of the railway station has been identified as a potential location for a car park to serve HS1 and the town centre in combination with ancillary retail development to improve 24 hour surveillance. An initial Feasibility Study has been undertaken of the area of land behind the ribbon development of Folkestone Road and land currently occupied by H.M. Customs and Excise. This Feasibility Study has indicated that there is potential for this area of land to be redeveloped for residential development to help to re-balance the housing stock that is currently on offer in this area; subject to this site becoming available.

3.99 As York Street is dual carriageway with footways on both sides and a central reservation there is the opportunity to undertake public realm improvements to this stretch of road and the potential to create a new bus interchange on York Street in order assist with connecting the town centre to Dover Priory Railway Station.

3.100 In terms of the Folkestone Road area, the focus is to restore and re-balance the housing stock and improve the general quality and appearance of this area. If property owners and landowners are not forthcoming with undertaking work, the District Council will consider using all of its planning powers to address the identified issues.

Broad objectives:

- Support proposals to allow the Dover Priory Railway Station to work as an integrated transport hub for the rail service, bus, BRT, taxi, cycle and car parking;
- Support improvements to Dover Priory Railway Station and the provision of additional car parking to serve the HS1 train service and Dover town centre with ancillary development;
- Improve the public realm of York Street by exploring the potential to remove the railings and other pedestrian obstructions by narrowing the roadway and planting trees;
- Support proposals for the relocation of the existing bus interchange at Pencester Road to York Street to enable public realm improvements to Pencester Road and the removal of buses from Biggin Street providing a fully pedestrianised town centre and better interchange with other modes of transport;
- Support site assembly to enable a comprehensive area for residential redevelopment that takes full advantage and maximises views of important historic assets;
- Support the possible conversion of larger properties that have been converted from flats and studio apartments to larger family homes to re-balance the housing stock that is currently available in this area;
- Encourage owners of properties to improve/maintain and restore the external appearance of their properties; and
- Where property owners are not forthcoming with undertaking work use the District Council's planning powers to address the identified issues.

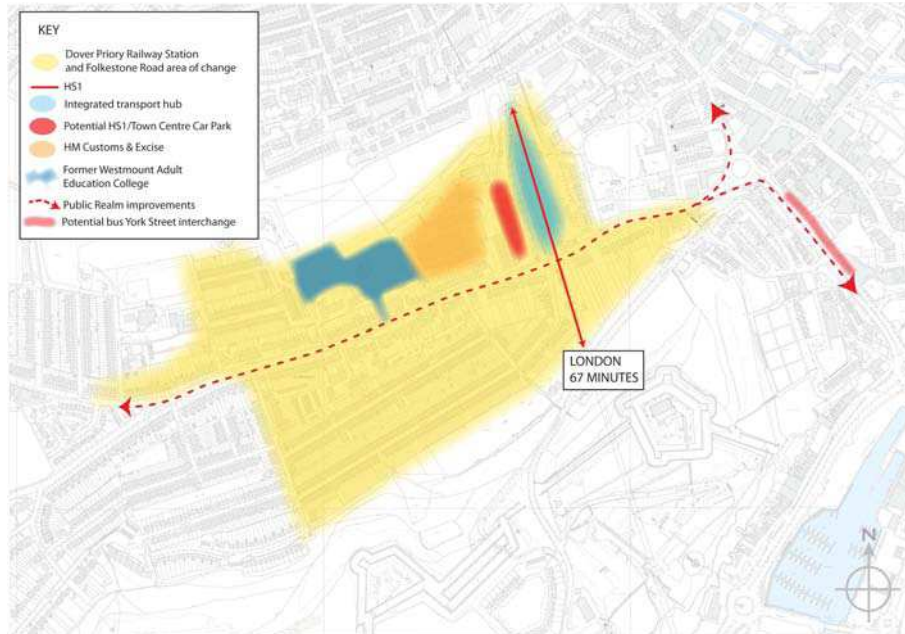


Figure 3.4 Folkestone Road

Western Heights

3.101 Dover has a particularly rich military history and contains a number of historically significant fortifications. These include the spectacular and powerful fortifications at the Western Heights, which represent one of the largest and most elaborate surviving examples of nineteenth century fortifications in England. The fortification is a Scheduled Monument and is located within the Western Heights Conservation Area. The fortifications are now in a very poor state of repair and are included on the English Heritage Buildings at Risk Register.

3.102 The first recorded permanent fortifications to be established on the Western Heights date from the 1770. The strategic importance of the Western Heights were recognised in the early nineteenth century and in 1804 a plan was put forward to modernise the defences on the Western Heights. These new Napoleonic fortifications took the form of two major redoubts, the Citadel and Drop Redoubt, which were augmented by a series of defensive lines and bastions. In this form the defences could hold a large body of men to repel any invading army as well as commanding the town, harbour and western approaches. The need to move troops rapidly from the heights to the town and harbour below led to the construction of the Grand Shaft. This takes the form of three independent staircases spiralling around a central shaft, completed in 1807, and is a particularly impressive feature. Advances in military technology, coupled with a perceived threat of invasion in the mid-nineteenth century led to further upgrading and expansion of the fortifications, and this continued throughout most of the nineteenth century.

3.103 The Citadel is currently occupied by an Immigration Removal Centre, while some private housing occupies the central section of the site. However, the Western Heights do not have a long-term use, and as such are vulnerable to neglect, decay and vandalism. Lack of maintenance, vegetation growth, weathering and the effects of heritage crime, continue to have a negative impact on this important heritage asset. The site's fragmented ownership brings with it additional challenges for securing a coherent strategy.

Broad Objectives:

- Produce a Master Plan and vision for the long-term future of the Western Heights;
- Support proposals that increase the significance of this Scheduled Monument and the internal relationships between the component parts of the Monument and their setting;
- Wherever possible, new and sustainable uses should be found for the existing heritage assets in order to ensure their long-term future;
- The openness of the interior of the Scheduled Monument, particularly between the two forts, is an essential part of its character, and as such should be retained;
- Investigate development proposals, particularly those which support tourism, that may be necessary to secure the long term protection and enhancement of the heritage assets;
- Use the historic character of the place to inform any future development and create a sense of place;
- Encourage greater public access to and interpretation of the Monument; and
- Any development proposals should be informed by the significance of the Monument and its component parts.

North Town

3.104 The Dover Masterplan (2006) identified an area called North Town which is situated to the north of Park Street as a key interface between High Street, Bridge Street and Salisbury Road. The Masterplan concluded that this area offered a number of regeneration opportunities as it also provides a link between St.Radigunds and the town centre.

3.105 North Town includes the Castleton Retail Park, Charlton Shopping Centre and a multi-storey car park. There is a pedestrian link from the Castleton Retail Park to the town centre via the multi-storey car park and the Charlton Shopping Centre although due to the nature of this pedestrian route it would benefit from being improved. The River Dour is largely hidden from view as it flows underneath the car parking area for the Castleton Retail Park and to the side of the multi-storey car park.

3.106 The focus of this Area of Change is to 'Create and Restore' by improving the general design and appearance of this area. There are opportunities to create walking and cycling routes along the river and enhance the role of the river and its setting. Any redevelopment of existing buildings offers the opportunity to improve the poor quality pedestrian route between the Castleton Retail Park and the Charlton Shopping Centre which is located on the High Street.

Broad Objectives:

- Improve the general quality and overall design of this part of Dover;
- Support proposals that make a positive contribution and enhance the role of the river and its setting;
- Explore opportunities when sites become available for redevelopment to create public and cycle access to the River Dour;

- Improve and upgrade the poor quality pedestrian links from North Town to the town centre; and
- Improve the vitality of the North Town area through alternative uses.

Dover Leisure Centre

3.107 Dover Leisure Centre occupies a particularly prominent site located on the corner of Townwall Street and Woolcomber Street. The current leisure centre is not of sufficient architectural merit to warrant retention and is not in a convenient location for the local population. Despite significant investment by the District Council it is in need of improvement as it currently does not meet modern day expectations for both wet and dry leisure facilities. These facilities include a swimming pool, squash courts, fitness suite, dance studio and a multi purpose sports hall.

3.108 A key component of the Core Strategy's plans to regenerate Dover is that the leisure facilities that are currently on offer in the town will need to be improved and upgraded to serve the existing and the planned increase in the population of Dover. An assessment of Swimming Pool provision in the District has been undertaken using the Sport England Facilities Planning Model (FPM). The assessment has sought to establish the extent to which the supply of swimming pools will meet demand in both 2011 and 2021. The FPM identified that one of the greatest concentrations of unmet demand is in the Dover Urban Area which is calculated to be operating close to its total capacity (modelled theoretical capacity) in 2011. The findings from the FPM will be reflected in the forthcoming updated District Council's Sports and Recreation Strategy.

3.109 The focus for this Area of Change is to 'Create and Restore' through either new leisure facilities on the existing site or the relocation of the existing leisure facilities to an alternative site. If the existing leisure centre is relocated, as the site occupies a prominent corner location, there is the opportunity to create a landmark building on this site.

Broad Objectives:

- Investigate and identify, as part of any updated Sports and Recreation Strategy or any subsequent document, a solution to the swimming pool requirements for Dover;
- Establish whether it is financially viable to refurbish the existing Dover Leisure Centre on the existing site or relocate the facilities to an alternative location and redevelop the existing site;
- If there are any plans to redevelop the existing leisure centre site for an alternative use these will need to address the interface between Townwall Street and Woolcomber Street and create a landmark building to reflect the sites prominent corner position.

3.2 Deal

3.110 Deal is a historic town located on the eastern coast of the district. The Deal urban area also comprises urban wards and the built-up parts of the parishes of Walmer, Sholden and Great Mongeham, which form a continuous built-up area.

3.111 The northern part of the town is low lying flat land which has been identified as being within high risk flood zones. There are also European nature conservation designations (Ramsar, Special Protection Areas and Special Areas of Conservation) to the north of Deal.

3.112 The town has 13,290 dwellings ⁽⁵⁾ and a population of 29,020 (Deal and Walmer wards) ⁽⁶⁾. The town has a wide selection of services including a range of shops, primary and secondary schools and a number of medical facilities including a local hospital. It is also served by a mainline railway and a high speed train service to London which operates at peak times. The Adopted Core Strategy identifies Deal as a District Centre the 'Secondary focus for development in the District; suitable for urban scale development'.

Urban grain and structure

3.113 Deal originated as a series of villages, Walmer, Upper Deal (now North Deal Ward), Sholden and Great Mongeham, with Sholden, Great Mongeham and Upper Walmer positioned on higher ground. Deal started to expand when it became one of the great maritime towns in England in the seventeenth and eighteenth centuries and then again when development of the nearby Kent Coalfield started in the early twentieth century.

3.114 The pattern of roads and tracks linking the settlements on the downs with the coastal settlements of Deal and Lower Walmer is determined by topography. They run parallel or at right angles to the slopes and ridges at about a 40 degree angle to the coast. The town itself is characterised by a generally tightly grained built form with narrow streets, which follow the direction of the coastline and are aligned in parallel or right angles to the sea. The railway line was constructed in the area where the two urban grids intersected. Connection between the grids across the tracks are limited. As a consequence, development in North Deal today feels isolated from the wider town.

3.115 Development between the villages in Deal today are nearly continuous, although Great Mongeham and Sholden still retain their 'village feel'. Latter day expansion of Deal has predominantly taken place on the high grounds to the south of the old town. Historically development in North Deal has taken place incrementally over the years and has been limited due to flood and access constraints.

Core Strategy

3.116 The Core Strategy has identified Deal as the secondary focus for development in the District. The issues raised in the Strategy include:

- The need for improved community facilities in North and Middle Deal;
- Limited supply of previously developed land; and
- The identification of three broad areas for urban extension.

3.117 The Strategy aims to retain and develop the town's popular appeal as a place to live while improving local employment opportunities and to reduce the need to travel.

Town Centre Boundary

3.118 The Retail Update (2012) shows that the Sainsbury's on West Street plays an important role in terms of retaining expenditure within the local area. It is currently located directly to the edge of the defined centre and provides the opportunity to enhance and

5 2001 Census
6 2010 estimate

encourage pedestrian linked trips and expenditure to shops, services and other facilities located in the town centre. To reflect the recommendations made within the Retail Update the town centre boundary has been amended, as shown in the diagram below, to afford Sainsbury's policy protection from competing edge and out of centre proposals.

Diagram to be inserted

Provision of Infrastructure

3.119 An integral part of the Core Strategy is to ensure that development proposals are supported by the timely provision of an appropriate level of infrastructure (such as affordable housing, open spaces or highways). This is reflected in Policy CP6. The infrastructure identified in the Core Strategy specifically for Deal included:

- A new secondary school to modernise and improve the standards;
- A nursery school to address a shortfall in North Deal;
- GP facility in North Deal;
- General community facility in North Deal;
- Multi-use community facility to serve Middle Deal;
- Indoor court tennis facilities at Deal; and
- Skate and BMX park.

3.120 The new GP facility and community building in North Deal has now been completed as part of the Golf Road/Cannon Street development. The new GP surgery meets the demand for such a facility in this area and the community centre is a valuable community asset providing space for a variety of activities for the general public.

3.121 In addition to the new GP surgery in North Deal, another new surgery opened in St Richards Road, in the western part of Deal.

3.122 A four court indoor tennis centre has opened on land adjacent to the Tides Leisure Centre which was jointly funded by Dover District Council and British Tennis. This new facility offers a complete programme of junior tennis coaching and playing opportunities. A skate and BMX park has also been built adjacent to the leisure centre.

Purpose of housing provision

3.123 The Core Strategy housing allocation for Deal is 1,600 dwellings and this is geared around meeting local rather than strategic needs. The proposed housing numbers would ensure that the population remains at the same level, but will not address the issues regarding the ageing of the population. The Core Strategy identifies, in Policy CP3, that the housing figure for Deal could be revised upwards subject to the investigation of the Middle/North Deal area.

3.124 There are, however, limited opportunities for further development in the town. This is primarily due to the limited supply of previously developed land (the majority of this has already been developed); there are access difficulties; and a large area encompassing the northern part of the urban area has been identified within Flood Zones 2 and 3.

3.125 The Core Strategy identified three broad areas for urban extension. These are located on the north side of Deal, in the Sholden vicinity and to the south of Deal in Walmer. The three sites have a combined estimated capacity of around 680 homes. Both of the sites in Sholden have been subject to planning applications for residential development; the

capacities of the sites have been reflected in this Plan. The site at Walmer is an estimated figure. To meet the overall requirement three smaller sites in Deal have also been identified for future development that do not warrant a site specific policy.

3.126 The Core Strategy has stated that development in Deal should reinforce the housing provision in the town and maintain the existing characteristics. Larger developments should incorporate foreground buildings and create vistas and focal points whereas small scale developments will generally provide background buildings.

Allocations

3.127 Six sites have been identified for residential development and these will provide approximately 785 dwellings. The allocated sites are identified in the diagrammatic plan below and the following table.

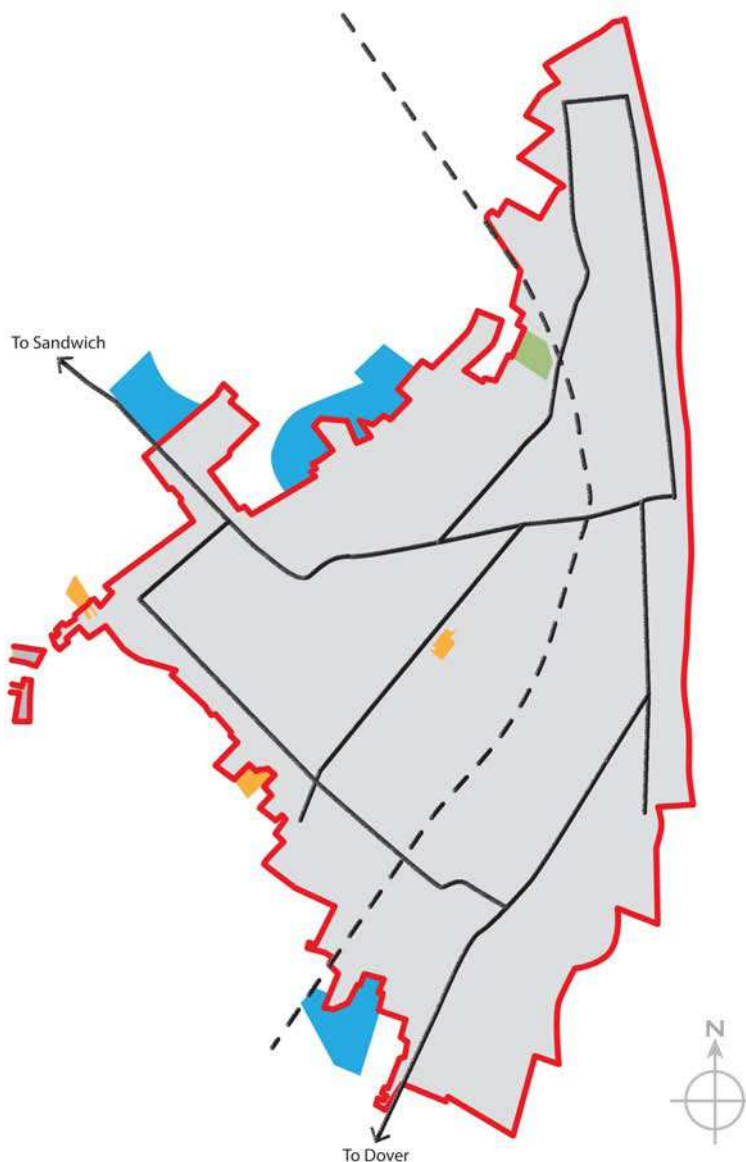


Figure 3.5 Diagram illustrating the allocated sites and changes in settlement confines in Deal

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Land Allocated for Residential Development at Deal			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land to the north of Sholden New Road, Sholden. (PHS010)	Reinforce but not change an area's housing offer. As the site is a large development, the design should incorporate foreground buildings and create vistas and focal points	230	Set out in Policy LA9
Land to the North of Middle Deal (PHS009)	Reinforce but not change an area's housing offer. As the site is a large development, the design should incorporate foreground buildings and create vistas and focal points.	230	Set out in Policy LA10
Land between 51 & 77 Station Road, Walmer (PHS013)	Reinforce but not change an area's housing offer. As the site is a large development, the design should incorporate foreground buildings and create vistas and focal points.	220	Set out in Policy LA11
Other Allocations/Changes to Confines			
<p>Site : Stalco Engineering, Mongeham Road (PHS11/ DEA 29 & 30)</p>	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area.	36	Comprehensive development; Flood Risk; Conservation Area Close to European Nature Conservation Designation
<p>Site : Land to the rear of 133-147, St Richards Road (SAD31)</p>	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area.	40	Creation of 15m wide planted landscape buffer to the south west to protect views from Ellen's Road and to enhance biodiversity;
1086			

Land Allocated for Residential Development at Deal			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
			Design
Site : Former Deal County Primary School (NS01DEA)	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area.	24	Open Space; Bat survey
Approximate total number of dwellings		785	

Table 3.4 Summary Table

3.128 Table 3.1 sets out the residual requirement of 205 dwellings for Deal. This took account of the identified urban extension areas (PHS010, PHS009, PHS013). Deducting the capacity of these sites, this Plan allocates sites for 105 dwellings. The remaining requirement for 100 dwellings will not be allocated. The potential for accommodating this requirement will be investigated as part of the study of Middle/North Deal.

Land to the north west of Sholden New Road

Site location and characteristics

3.129 This is a roughly rectangular site located on the north western edge of Sholden, which consists of agricultural land framed on three sides by mature trees. These are protected by Tree Preservation Orders and consist of a mix of evergreen trees to the northeast. The trees form a strong visual screen between the site and properties at Hull Place; to the south east by an avenue of Beech Trees, which create a well defined screen between the site and the development within Sholden; and, to the northwest by a deciduous tree belt which adjoins a private unmade track serving Cottington Lakes Fishery. This provides screening between the site and open farmland. The site boundary with the A258 (which runs along the southwest) is relatively open with partial screening by a hedge.

Site context

3.130 The site falls gently to the north, away from the southwestern boundary. The overall character of the site is an area of rural transition from urban to open countryside. The site falls within the broad area identified as an area for urban extension in the Core Strategy. The site is located on the A258 on the edge of the built urban form and the surrounding uses reflect this location with open countryside to the south west and north west and residential

properties to the north east and south east. There are a number of properties to the north of the site, at Hull Place, which are listed buildings. European designated nature conservation sites lie to the north of the site. The site lies just outside of Flood Zones 2 and 3.

3.131 A public footpath runs parallel with the sites northeastern boundary and the site is in close proximity to public footpaths giving good access to open countryside routes. A segregated cycle way is located to the west and runs parallel with the A258 connecting the site with Fowlmead Country Park and Betteshanger employment site further to the west.

Proposed Development

3.132 The scale and type of development lends itself to foreground buildings and creating vistas and focal points. Development will need to pay particular attention to the retention of the mature trees that frame the site to ensure that a 'soft edge' to the urban form is retained. To safeguard the trees from any future pressure for removal, development should be set back by 20m. The design and layout should also consider the relationship of the development with local heritage assets, particularly the listed buildings located to the north of the site.

3.133 Access to the site should be via the A258 and measures provided to mitigate against impacts on the wider road network. Measures to support cycling, use of buses and walking should be an integral part of the proposals. The foul sewerage system may also need to be upgraded.

3.134 Measures to mitigate any detrimental impacts on the European nature conservation designations, located to the north of the site, should also be investigated. The site has been the subject of a planning application for 230 dwellings which has been reflected in the capacity of this allocation.

Policy LA 9

Land to the north west of Sholden New Road

Planning permission for residential development on land northwest of Sholden (as defined on the Proposals Map) will be permitted provided that:

- i. density of development is progressively reduced and landscaping provided towards the north western and south western boundaries, in order to provide transition to the countryside;
- ii. existing trees are retained with a 20m safeguarding boundary provided, unless removal is essential for access;
- iii. suitable access is achieved and measures provided to mitigate against impacts on the wider road network; and
- iv. any landscaping throughout the site should improve biodiversity value.

Land between Deal and Sholden

Site location and characteristics

3.135 This is an irregular shaped site located on open land separating Middle Deal and Sholden. The site consists of agricultural land which falls gently from the south to the north, with a hedge running across it.

Site context

3.136 There are agricultural fields to the north and west of the site, business uses to the north east (Southwall Road area) and residential areas to the east and south. The eastern part of the site is within Flood Zones 2 and 3 and to the north east there are European nature conservation designations.

3.137 To enable the Council to gain a greater understanding of the issues and the development opportunities, the site was subject to a Masterplanning exercise with stakeholder involvement in 2006. The area was identified as a broad area for urban extension in the Core Strategy. The Core Strategy identified an infrastructure requirement for a multi-use community facility to serve Middle Deal to address current deficiencies and help support the additional development ⁽⁷⁾.

Proposed development

3.138 Any proposal should also incorporate foreground buildings and create vistas and focal points. To the east, the site is within Flood Zones 2 and 3 and the site boundary reflects that of the recent planning application, which was identified through a flood risk sequential analysis within the site. Due to the low lying nature of this area, surface water management and flood attenuation will also be required.

3.139 The Heritage Strategy has identified five 'Themes' that should be considered as part of any proposal. The Themes are 'Coastal Processes and Landscape', 'Listed Buildings', 'Archaeology', 'Church', 'Settlement' and 'Farmsteads' and these should be referred to as part of any application. The main issues to be considered are that the site provides short views of Sholden and St Nicholas's Church and long uninterrupted views of the coast. Land to the west of the site, currently in agricultural use must also be retained to ensure that there is separation between the settlements of Sholden and Deal.

3.140 The Core Strategy identified the need for a multi-use community facility to serve the Middle Deal area. If it can be demonstrated to be financially viable and an operator could be identified this should form part of the development proposal. The site has been the subject of a planning application for 230 dwellings which has been reflected in the capacity of this allocation.

Policy LA 10

Land between Deal and Sholden

Planning permission for residential development on land between Deal and Sholden (as defined on the Proposals Map) will be permitted provided that:

- i. the rural edge is enhanced through the use of landscaping;
- ii. views of St Nicholas's Church and the wider landscape are incorporated into any design and retained;
- iii. community facilities are provided to benefit existing and new residents in the area;
- iv. suitable access is achieved and measures provided to mitigate against impacts on the wider road network including sustainable transport measures;
- v. footpaths are preserved, and where necessary enhanced and integrated into the development; and
- vi. any landscaping throughout the site should improve biodiversity value.

Land between 51 and 77 Station Road, Walmer, Deal

Site location and characteristics

3.141 This is an irregular shaped site located on the southern edge of Walmer, consisting primarily of agricultural land, fronting Station Road with allotments and undeveloped land behind Mayers Road. The majority of the boundary consists of hedgerow. There is no physical boundary to the south western edge. The land falls gently to the north towards Station Road. Telephone lines and public rights of way cross the site.

Site Context

3.142 This area has been identified as a broad area for urban extension in the Core Strategy. The site lies on the edge of the built form and this is reflected in the surrounding uses. To the north and east of the site there are residential properties. To the south east there is a caravan holiday park and to the south is open countryside. A railway line abuts the far northwestern boundary.

Proposed Development

3.143 Any proposal should incorporate foreground buildings and create vistas and focal points. In order to avoid a detrimental impact on the wider landscape, development would have to be in conjunction with structural landscaping to create a new southern western boundary line. This is to reduce the visual impact in the wider landscape and help to create a new rural-urban transition. This should be approximately 15m in width and comprise native species. The area can also be used for SUDs and informal recreation.

3.144 Development at this scale would require a secondary road/emergency access and this could be established, with a defined turning head, from the south western end of Mayers Road. Mayers Road is not suitable for any other access points to the site.

3.145 There are also a number of footpaths that cross the site, which should be retained in any proposed development. Views are important, in particular that of Ripple Windmill and development proposals would need to retain this view corridor as part of the design and layout.

3.146 The site also falls outside of the catchment of existing play space as set out in the Review of Play Area Provision 2012-2026 (March 2012) and will have to provide suitable play space, as set out in the Play Standards in this Plan. The site is estimated to have a capacity of 220 dwellings.

Policy LA 11

Land between 51 and 77 Station Road, Walmer, Deal

Planning permission for residential development on land between 51 and 77 Station Road, Deal (as defined on the Proposals Map), will be permitted provided that:

- i. the main access is onto Station Road;
- ii. the southern edge of the development creates a soft landscaping boundary with the adjacent rural area;
- iii. footpaths are preserved and integrated into the development;
- iv. play space provided;
- v. long views of Ripple Windmill and the wider countryside are retained; and
- vi. the landscaping throughout the site should improve biodiversity value.

Albert Road, Deal

The development of Albert Road, Deal for B1 and B2 employment uses is covered by Saved Local Plan Policy LE5.

Betteshanger Colliery Pithead

The development of Betteshanger Colliery Pithead for B1, B2 and B8 employment uses is covered by Saved Local Plan Policy AS1.

3.3 Sandwich

3.147 Sandwich is located in the north eastern part of the District. The town is a historic Cinque Port and market town on the River Stour. Sandwich is renowned for its medieval street pattern and high concentration of Listed Buildings. It is, however, located in a low lying landscape which has been identified as being within high risk of flooding. The town has a population of 4,920 ⁽⁸⁾ and approximately 2,325 dwellings ⁽⁹⁾. To the north of the town there is a major business area leading up to and including Richborough.

3.148 Sandwich serves the daily needs of the town itself and neighbouring villages and has a wide selection of services including a range of shops, primary and secondary schools and medical facilities. The town is also served by a mainline railway with a high speed train service to London operating at peak times. The principal A256 route from Dover to Thanet has recently been upgraded to a dual carriageway through the East Kent Access programme. To the north of the town is Discovery Park Enterprise Zone.

3.149 An international golf course, Royal St. George's Golf Club, which has hosted the British Open Championship, lies to the immediate east of the town. A second golf course of national importance, Princes Golf Course, lies to the north east. Both are important contributors to the local economy and profile of the area. The Core Strategy has identified Sandwich as a 'Rural Service Centre' the main focus for development in the rural area, suitable for a scale of development that would reinforce its role as a provider of services to a wide rural area.

Urban grain and structure

3.150 The medieval origins are clearly seen in the tightly knit street pattern and built form within the remains of the town wall; a scheduled monument. Outside of the town wall, to the south and west, the street pattern becomes looser, reflecting latter day developments. The River Stour (which was once the coastal edge) has contained development from moving northwards and it is only relatively recently that residential development has taken place on part of the former Sandwich Industrial Estate. Further north is the Discovery Park Enterprise Zone which was occupied by a large pharmaceutical complex. The site was developed gradually since the 1950s and is particularly visible from A256 and the north of Sandwich. Beyond the Enterprise Zone is a business area which has developed along the A256 (Ramsgate Road).

Employment

3.151 The Core Strategy identified that the area north of Sandwich should be promoted for a wide range of uses to support jobs. The Discovery Park Enterprise Zone comprises of high quality Research and Development buildings, formerly occupied by Pfizer. The Richborough area, which is north of the Enterprise Zone, comprises smaller-scale industry and brownfield land suitable for commercial redevelopment. This area has become a focus for waste industries and land has been identified in the Kent Minerals and Waste Local Plan for potential energy from waste, green waste treatment and for the treatment/materials Recycling facilities. Development proposals in this area should also refer to the Minerals and Waste Local Plan.

Core Strategy

3.152 The Core Strategy identified that the town should be the main focus for development in the rural area. The main issues raised in the Core Strategy are that:

- there is evidence that the centre is losing vibrancy;
- there is a need for improved coach parking facilities;
- some affordable housing will have to be met at Dover or Deal, where there is more opportunity for development;
- the Richborough business area should be promoted for a wide range of uses that would support jobs growth and the research and development functions across the business and education sectors.

3.153 The Core Strategy has identified that development should reflect the existing character whilst taking opportunities to improve design standards. The potential for previously developed sites in the town and undeveloped sites on the edge of the town are limited. The town is subject to a number of constraints to development including the narrow road network of the medieval core, the high concentration of historic assets and flood risk. The areas at risk from flooding will be improved with a planned new flood defence scheme, which is anticipated to be completed in 2015. Overall, there are few locations where development could take place without any of these constraints. The only opportunity for development is on land on the south western edge of the town which the Core Strategy has identified as a broad location for urban extension.

Sandwich Town Centre

3.154 The 2002 Local Plan did not designate a town centre boundary or primary shopping frontages in Sandwich. It was considered inappropriate at that time due to the relatively dispersed nature of the centre and the wide variety of uses there. A secondary shopping frontage in the town was, however, designated to allow for a greater flexibility in the mix of uses encouraged in the area.

3.155 In recent years, however, this situation has led to ambiguity in respect of whether proposed development sites are defined as “in”, “edge” or “out” of centre for the purposes of the sequential assessment. Following recommendations in the Retail Update (2012), the District Council has designated a town centre area in Sandwich to protect the vitality and viability of the town centre and to provide clarity for any sequential assessments. This is in addition to the secondary shopping frontages, which will remain.

3.156 The area designated reflects the street pattern of the secondary shopping frontages and includes the length of King Street, turning into Delf Street and branching out into Market Street, to the north, and Cattle Market, to the south. The designation also includes St Peter’s Church off Market Street, the Guild Hall in Cattle Market, and the supermarket off Moat Sole. The diagram below illustrates the area covered.

Diagram

Provision of infrastructure

3.157 An integral part of the Strategy is to ensure that development proposals are supported by the timely provision of an appropriate level of infrastructure (such as affordable housing, open spaces, highways). This is reflected in Policy CP6. The Core Strategy identifies two specific requirements:

- a new flood defence system from Sandwich Bay to Pegwell Bay; and
- A GP based facility (subject to further investigation).

New convenience retail provision in Sandwich

3.158 The Retail Update (2012) has indicated that there is a qualitative need for additional provision of convenience goods of 2,400m² within or at the edge of the centre in Sandwich. The NPPF recognises that town centres are at the heart of communities and Plans should allocate a range of suitable sites to meet the scale and type of retail development needed in town centres. The tight historic grain of the town, however, does not provide opportunities for larger retail provision. A suitable site to accommodate the identified need for additional convenience provision has, therefore, been identified on the edge of the designated town centre area in Sandwich.

3.159 The objectives of the allocation is to provide further choice and range in Sandwich to claw-back leakage in a way that complements the town centre. The edge-of-centre location reflects the need to ensure that the town's vitality and viability benefits from the development encouraging linked trips. This proposal would reduce the impact on the historic town and its heritage assets.

Site Location and characteristics

3.160 The site is located just to the south of the town centre of Sandwich. It is irregular in shape and is flat, consisting primarily of an open air car park (Guildhall) together with public toilets (to the north) and a Doctor's surgery (to the west). There are three trees on the site, one located in the northern edge of the site and two close to the Doctor's surgery. The road known as Cattle Market runs along the northern and eastern boundaries of the site.

Site Context

3.161 The site is located to the south of the town centre, within the Sandwich Walled Town Conservation Area, with access from Cattle Market. This is a very prominent and sensitive part of the town with there being a large number of listed buildings to the west, north and east of the site. To the south lies the Town Wall, which is a designated Scheduled Monument.

3.162 The surrounding buildings display a wide variety of building styles and designs, however, the use of traditional materials and detailing help to give the area a coherent character and appearance.

3.163 A variety of uses surround the site, reflecting its central location within the town. Adjacent to the site, on the north western boundary is a car garage. To the north of the site is the Guildhall, a Town Council building encompassing public and private functions, a museum and a tourist information office. Beyond is a market square with public houses, takeaways, small shops and a bank. To the east, north west, and west of the site are residential dwellings. To the east, these front Cattle Market and overlook the site. There is also a modern residential development further to the south east. Further to the north west, there is a (listed) public house and a modern convenience retail store. To the south of the site there is a dwelling with a large garden. Beyond this, accessed by a footpath from the site, there is protected open space that follows the line of the historic town wall.

Proposed Development

3.164 Any proposals will need to demonstrate the highest possible standards of architecture and urban design and should reinforce local distinctiveness. There may be an opportunity to include an element of mixed uses, which may help to ameliorate the visual impact of the building and integrate it with the existing urban form.

3.165 The relationship of the surrounding built form and their uses should also be a consideration when positioning the retail unit within the site. Any proposals should ensure that new development promotes legibility, natural surveillance and way finding to the town, to the north, and to the historic Town Wall, to the south, through the orientation of the building (or buildings). There is also an opportunity to create a quality public space, possibly a square, overlooked by the neighbouring residential properties and the new development. It is envisaged that this public space would be used as a car park but it could be enhanced through the use landscaping, such as the use of trees formally planted throughout the site. This would also help soften the impact of the development on the street scene.

3.166 The Doctor's surgery has been included within the site to provide options for site layout and orientation but the development could be positioned around the existing surgery. If the location of the surgery was required, then new facilities would be provided on the site.

3.167 Vehicular access to the site has already been established but further consideration should be given to delivery vehicles and the amenity of nearby residential properties on Cattle Market. It may be necessary to realign the corner of Cattle Market to ensure larger vehicles can turn safely. The footway, to the south of the site, leading to the Town Wall, must be retained. Any proposals would have to demonstrate sufficient parking for the store, doctor's surgery and the town centre managed in an appropriate way

Policy LA 12

New convenience retail Guildhall Car Park

Planning permission for new convenience provision on land at the Guild Hall Car Park, Sandwich (as defined on the Proposals Map) will be permitted provided:

- i. proposals supports the vitality and viability of Sandwich town centre;
- ii. proposals do not detract from the appearance, character and setting of any heritage assets;
- iii. proposals are of innovative design that responds to the local character, identity and the historic nature of Sandwich in terms of materials, detailing and roofscape;
- iv. high quality public spaces and pedestrian linkages to the town and to the historic Town Wall are created through the orientation of buildings and landscaping;
- v. It can be demonstrated that there is sufficient parking for the store, Doctor's surgery and town;
- vi. a suitable and safe access for service vehicles is provided;
- vii. the amenity of neighbouring residents are protected; and
- viii. provision is made for an archaeological evaluation.

Purpose of housing provision

3.168 The local housing market is strong at Sandwich with high demand and average house prices remaining relatively high across the area since 2001.

3.169 The Core Strategy housing allocation for Sandwich is 500 dwellings (230 taking into account planning permissions). The housing at Sandwich is geared around meeting local rather than strategic need and will ensure that the population remains at the same level, but will not address the issues regarding the ageing of the population. Any development should reinforce but not change the area's housing offer and should reflect the existing character while taking opportunities to improve design standards.

3.170 Although Sandwich is constrained by Flood Zone 2 and 3, revised Environment Agency mapping has reduced the risk, particularly to the south. Two sites have been identified for future development that are within the sequentially preferable Flood Zone 1. Together with an area identified in the Core Strategy for urban extension, these will accommodate 230 dwellings. The allocated sites are identified in the diagrammatic plan below and the following table.

Housing Sites



Figure 3.6 Diagram illustrating allocated sites in Sandwich

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Land Allocated for Residential Development at Sandwich			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land to the west of St Bart's Road including Kumar Nursery, Sandwich (PHS 17 &18)	Reinforce but not change an area's housing offer. As the site is located on the edge of the village and it is a large development, design will be important as there will be an opportunity to create a new 'entrance' to the town with landmark buildings of a scale appropriate to the surrounding properties.	100	Set out in Policy LA13

Land Allocated for Residential Development at Sandwich			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land at Archer's Low Farm, St George's Road (SAN04)	Reinforce but not change an area's housing offer. The site is located on the edge of the town but is set behind existing development on the edge of the conservation area. Although the site is set behind existing mature trees, the overall design should reflect the existing character of the area while taking any opportunities to improve design standards.	50	Set out in Policy LA14
Land adj Sandwich Technology School, Deal Road (SAN13)	Reinforce but not change an area's housing offer. The site is located on the edge of the town in a prominent position, design will be important so not to detract from the setting of the historic town. Development should, therefore, reflect the existing character of the area while taking any opportunities to improve design standards.	80	Set out in Policy LA15
Approximate total number of dwellings		230	

Table 3.5 Summary Table

Land to the west of St Bart's Road including Kumar Nursery, Sandwich

Site location and characteristics

3.171 The site is located on the western edge of Sandwich and consists primarily of flat open agricultural land but also includes a residential dwelling that fronts Woodnesborough Road, allotments and an agricultural nursery. The property and the nursery are enclosed behind an established hedgerow. A footpath crosses the site from the north east to south west.

Site Context

3.172 The site lies on the edge of the built form so there is residential development to the north, south east and north west. The local school lies to the east and there is farmland to the west and south west. The site has access to Woodnesborough Road to the north and

St Bart's Road to the east. Kumar Nursery has an access to Dover Road to the south. Dover Road has been closed at the far western end due to highway safety reasons and can only be accessed from Deal Road to the east.

Proposed Development

3.173 Any proposal should also incorporate foreground buildings and create vistas and focal points. It is considered that development in this area would not have a detrimental impact on the wider landscape but the transition from the town to the countryside is an important consideration in any design. In order to provide this any proposal should include landscaping along the western boundary and retain any existing hedgerows and vegetation. Development would also need to consider the retention or relocation of the allotment gardens that form part of the site.

3.174 Whilst the size of the site would be capable of accommodating a greater number of dwellings the scale of development has been limited to 100 dwellings due to highway limitations. Access to the site should be from a single access onto Woodnesborough Road to the north of the site with an emergency access from St Bart's Road. Dover Road, to the south, is unsuitable for any new road access due to the narrowing road and poor junction onto Deal Road. A pedestrian and cycle connection should be established to Dover Road to improve connectivity to the local schools.

3.175 As the site is in multiple ownership it should be planned comprehensively. If it is implemented incrementally, each stage must demonstrate that it will not prejudice the implementation of the remainder.

Policy LA 13

Land to the west of St Bart's Road including Kumar Nursery, Sandwich

Planning permission for residential development on land to the west of St Bart's Road and south of Woodnesborough Road, Sandwich (as defined on the Proposals Map) will be permitted provided that:

- i. there is a comprehensive approach to development on the whole site;
- ii. access to the site is from Woodnesborough Road;
- iii. landscaping is provided along the western boundary in order to provide a suitable transition to the countryside;
- iv. existing boundary hedgerows and vegetation are retained; and
- v. the allotments are retained or relocated.

Land at Archer's Low Farm, St George's Road

Site location and characteristics

3.176 A rectangular site consisting of flat agricultural land and associated farm buildings and access, located on the eastern edge of the town. The site is framed by mature trees along almost the entire boundary line. Access is onto Sandown Road to the north east and there is another smaller access onto St George's Road.

Site context

3.177 There are agricultural fields to the north east, east and south of the site. Along the north western boundary there is residential development, which currently forms the edge of the town. There is one dwelling to the east of the site. Sandwich Conservation Area lies to the northwest/west but is separated from the site by a line of dwellings.

Proposed Development

3.178 Integral to the development is the transition from the rural open character to the urban town and ensuring that any development creates a 'soft' edge. Development proposals should include background buildings reflecting the existing character of the surrounding area.

3.179 Trees surrounding the site are an important feature and should be retained and incorporated in the design and layout. The retention of trees will help to mitigate any detrimental impact from development on the wider landscape and the setting of the historic town and conservation area. Development should, therefore, be set back at least 20 metres away from the trees to ensure that pressure to remove them is reduced. This buffer will also help towards (but not meet all) mitigation for impacts on the European designated sites, which are located close to the site (the nearest designation is approximately half a kilometre away).

3.180 The single main access should be onto Sandown Road. This may require the removal of some of the vegetation to provide the correct sight lines. There is also an existing gate onto St George's Road and this could be utilised for foot and cycle connectivity. The estimated capacity for this site is 50 dwellings due to the single access.

Policy LA 14

Land at Archer's Low Farm, St George's Road, Sandwich

Planning permission for residential development on land at Archer's Low Farm (as defined on the Proposals Map) will be permitted provided that:

- i. access to the site is from Sandown Road; and
- ii. existing trees are retained, unless removal is essential for access, and a 20m safeguarding boundary is provided.

Land adjacent to the Sandwich Technology School, Deal Road

Site location and characteristics

3.181 This is an irregular shaped site located on the southern edge of the town. It consists of a flat agricultural field and associated farm buildings, with a hedgerow around the boundary.

Site context

3.182 The site lies on a particularly prominent site on Deal Road, one of the main routes into Sandwich. The site is on the edge of the town and the surrounding uses reflect this rural/urban transition. To the west of the site there is the Sandwich Technology School. There are residential dwellings, fronting Dover Road, along the northern boundary and to the north east. There is a farm shop to the east and open countryside to the south east. There are three listed buildings located on Dover Road and the boundary of these properties abut the site.

Proposed Development

3.183 Although this could be described as a larger development the site is located on the edge of the historic town. Any development will, therefore, have to take into account and address the transition from the rural open character to the urban town and ensure that any development creates a 'soft' edge.

3.184 Any development should be set back from Deal Road (starting at approximately 30 metres from the road at the western end reducing gradually eastwards) to allow landscaping to be introduced along the frontage of the development. This would help to provide a 'soft edge' and create an attractive entrance to the historic town.

3.185 Access to the site should be from Deal Road with an emergency access onto Dover Road to enable development over fifty dwellings and to ensure improved cycling and pedestrian connectivity between the two roads. Frontage development along Dover Road would be acceptable but vehicle access would not and would be from Deal Road. The estimate capacity on this site is 80 dwellings. The diagram below illustrates the main issues.



Figure 3.7 Opportunities and Constraints. Deal Road, Sandwich.

Policy LA 15

Land adjacent to the Sandwich Technology School, Deal Road, Sandwich

Planning permission for residential development on land adjacent to the Sandwich Technology School, Deal Road,(as defined on the Proposals Map) will be permitted provided that:

- i. an access to the site is from Deal Road with an emergency access onto Dover Road;
- ii. existing hedgerows are retained, unless removal is essential for access; and
- iii. a landscaping buffer is provided along Deal Road.

3.4 Rural Area

3.186 The Core Strategy has identified the need for 1,200 homes in the rural area. Table 3.1 sets out the residual requirement (836 dwellings) after taking into account unimplemented commitments and completions since 2006. Whilst the Core Strategy identified a Settlement Hierarchy the distribution of housing in the rural area is a matter for this Plan.

3.187 This Plan has identified a range of sites in the rural area for future development that reflect the environmental constraints and the ability of a settlement to accommodate additional development. Sites that have been identified for development will allow the organic growth of settlements to take place in a managed and sustainable way whilst meeting the housing requirements for the rural area.

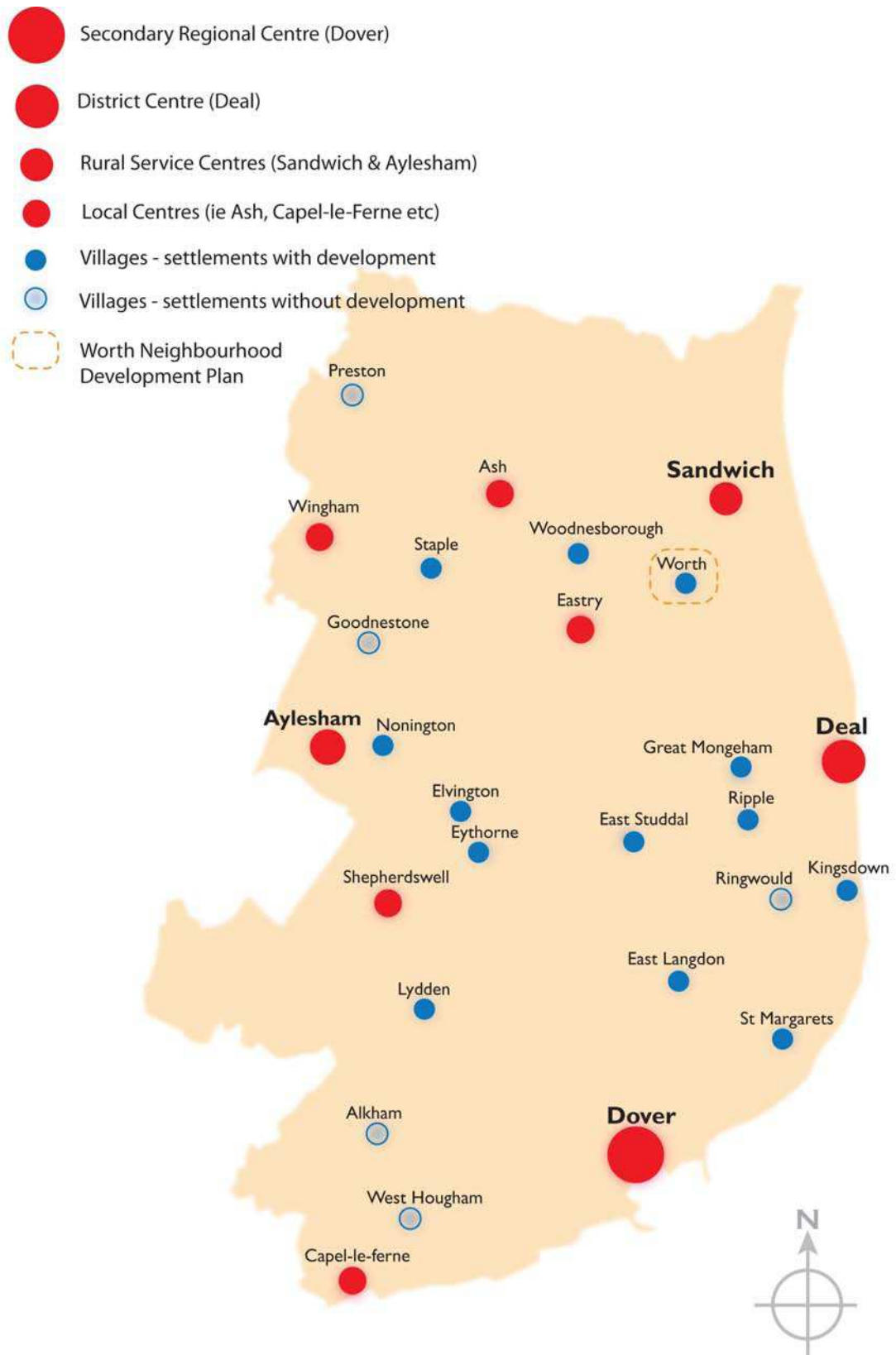


Figure 3.8 Diagram illustrating the distribution of residential development in the rural area.

Housing Quality

3.188 The Core Strategy identifies the purpose of housing development for each area within the District. In the rural area, the purpose is to reinforce; the aim is to reflect the existing character of the area, while taking any opportunities to improve design standards. In contrast to the local housing market of Dover, the local housing market of much of the rural area (with the exception of Aylesham) is performing well. In line with Policy CP5 - Sustainable Construction Standards, both design and construction standards should be high to deliver a high quality environment. Further guidance on the purpose of the housing provision is given in paragraphs 3.35 to 3.41 of the Core Strategy, and must be taken into account when drawing up detailed proposals for housing sites to ensure appropriate design and mix of housing types.

3.189 The majority of site allocations and change of confines in the rural area will enable small to medium scale developments to come forward. On these sites, local characteristics should be reflected to offer not only family housing, but also to provide for the ageing population. Where larger scale development is proposed, in the range of 30 to 100 dwellings, there is an opportunity for foreground buildings to be incorporated, whilst creating vistas and focal points and if appropriate create landmark features. Where this opportunity exists reference to this is referred to in the summary table for each settlement.

Worth

3.190 This Plan has not examined the need for future development in the settlement of Worth as a Neighbourhood Plan is being developed by the local community. In line with the NPPF, the Council should not duplicate this process, which is being led by the community. Details will be made available on the Council's website (www.dover.gov.uk/ldf).

Aylesham

3.191 The village was identified as a strategic development opportunity site in Dover District Local Plan (2002) for up to 1,000 new homes, primary school extension, employment uses, food retail and associated mix of uses.

The Core Strategy (para 3.31) has identified that the Local Plan policies (AY1 to AY11) will remain 'saved' and will not be reviewed as part of this Plan.

Rural settlements that have not been identified for additional development

3.192 There are a number of settlements in the District where sites have been assessed and have not been identified for development:

- Alkham
- Goodnestone
- Preston
- Ringwould
- Ripple
- West Hougham

3.5 Local Centres

3.5.1 Ash

3.193 Ash is located in the northern part of the District approximately 2.5km to the west of Sandwich and a similar distance from Wingham to the east. It is one of the largest villages in the District, within a parish consisting of a population of 3,240 people ⁽¹⁰⁾ and 1,128 dwellings. ⁽¹¹⁾

3.194 The village has a wide range of commercial and community facilities including a Doctor's surgery, primary school, church, village hall (with library) and a range of shops including a post office. Ash is also conveniently located approximately 3.5km from the Discovery Park Enterprise Zone, which is just north of Sandwich.

3.195 To help sustain and strengthen Ash's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. The constraints on development relate to the impact on the wider landscape as the village is highly visible from the south, and heritage as there are three conservation areas and numerous listed buildings in the village.

3.196 Three sites have been identified for residential development and these will provide approximately 200 dwellings. There is also one change to the Ash Settlement Confines, to include properties from 67 to 99 Sandwich Road. The amendment reflects the consolidation of development (existing and proposed) that is adjacent to the properties along Sandwich Road. It is unlikely that this change will provide any further new dwellings and any new development would be determined against Development Management policies in the Core Strategy. The allocated sites and the change to the confines are identified in the diagrammatic plan below and the following table.

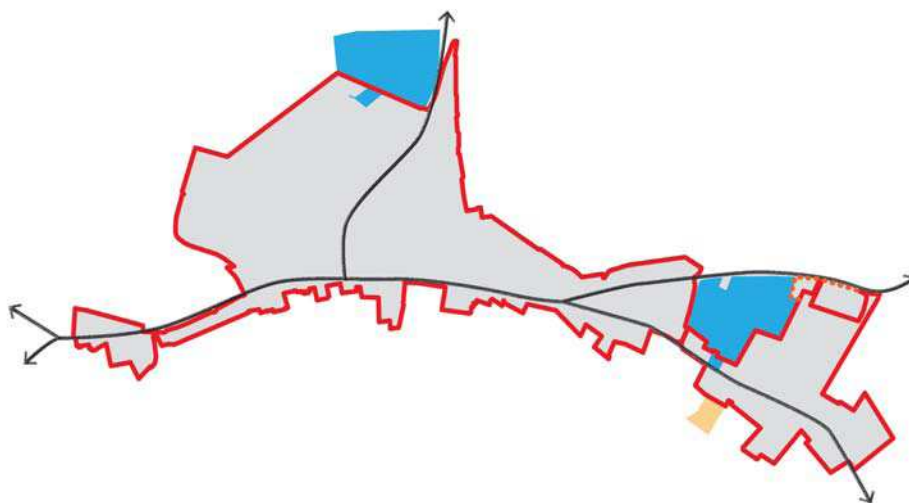


Figure 3.9 Diagram to illustrate Allocated Sites and Change in Settlement Confines in Ash

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Land Allocated for Residential Development at Ash			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land at Chequer Lane & former Council yard at Molland Lea. (SAD24/SHL026)	Reinforce but not change an area's housing offer. As the site is located on the edge of the village, design will be important as there will be an opportunity to create a new 'entrance' to the village with landmark buildings of a scale appropriate to the surrounding properties.	95	Set out in Policy LA16
Land between Cherry Garden Lane and 79 Sandwich Road. (LDF04 incorporating ASH04, ASH06, ASH07, ASH09 & ASH10)	Reinforce but not change an area's housing offer. The site is located on the edge of the village but set behind existing development. Design should reflect the existing character of the area while taking any opportunities to improve design standards.	95	Set out in Policy LA17
Other Allocations/Changes to Confines			
Site : Land at Millfield (SHL011)	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area while taking any opportunities to improve design standards.	10	Retention of Hedgerows
Site : 67-99 Sandwich Road (SHL012/ASH01)	The change has been introduced to include existing dwellings.	Change to Settlement Confines	None
Approximate total number of dwellings		200	

Table 3.6 Summary Table

Land at Chequer Lane, Ash

Site location and characteristics

3.197 The site consists of two adjacent pieces of land located to the north of Ash. The largest site is agricultural land to the east of Chequer Lane and to the south of the A257 (Ash Bypass). The second piece of land is the former Council Yard off Molland Lea, which is located to the south of the agricultural land and only separated by an unsurfaced path (PROW EE112). This site currently consists of hard standing, a scout hut and garages.

Site Context

3.198 The site lies on the edge of the current built form of Ash. The former Council Yard has residential properties on three of its four boundaries. The larger part of the site, the agricultural land, lies to the north of the Council Yard and residential area. There are agricultural fields to the west and a landscaping buffer (for the A257) to the north, which consists of trees, shrubs and a bund. There are further residential properties to the east.

Proposed Development

3.199 Chequer Lane is one of the main routes into the village and this provides an opportunity to create a design that defines the entrance to the village. This could be through the use of a focal point or landmark building proportionate to the scale of existing development.

3.200 Access to the former Council Yard, for approximately five dwellings, would be from Molland Lea. Access to the agricultural land would be from Chequer Lane with an emergency access, a requirement for sites larger than fifty dwellings, through the former Council Yard. This arrangement also provides an opportunity to provide a greater degree of connectivity by foot and cycling, between the land off Chequer Lane and the existing built form of Ash, particularly to the local primary school. This would also help retain and enhance the current PROW (EE113) that follows this route.

3.201 It is for these reasons the two pieces of land have been considered together and should be planned comprehensively. If implemented incrementally, each stage must demonstrate that it will not prejudice the implementation of the remainder.

3.202 The agricultural land does not have an established western boundary and this would have to be created through additional landscaping as part of any development. This landscaping should be no less than 15m in width to accommodate native species of trees and SUDs. The area could also be used for informal recreation. With regard to the former Council Yard, there is a scout hut which is in use and is a valuable community activity. If this cannot be incorporated into the development, an alternative location should be provided. The estimated capacity of both sites is 95 dwellings.

Policy LA 16

Land to the East of Chequer Lane (incorporating former Council Yard), Ash

Planning permission for residential development on land to the East of Chequer Lane and the former Council Yard off Molland Lea, Ash (as defined on the Proposals Map) will be permitted provided that:

- i. the main access for the larger site will be from Chequer Lane with the emergency access from Molland Lea;
- ii. the retention of existing boundary hedgerows and vegetation and the provision of new line of landscaping, no less than 15m in width, to establish the western boundary;
- iii. cycle and pedestrian connections are provided between the sites from Chequer Lane to Molland Lea; and
- iv. Provision of a scout hut.

Land to the South of Sandwich Road, Ash

Site location and characteristics

3.203 The site is located on the eastern side of Ash, south of Sandwich Road. The site is in multiple ownership and the uses reflect this, consisting of a grass field, paddocks, agricultural land (an old orchard) and a business use.

Site Context

3.204 The site is located on the edge of the built form of the village with residential development to the east, west and south of the site. To the north, beyond Sandwich Road, there are open agricultural fields.

Proposed Development

3.205 The site is located on the edge of the village but set behind existing development. Design should reflect the existing character of the area while taking any opportunities to improve design standards.

3.206 As the site is within multiple ownership it is important that any development should be considered comprehensively, rather than piecemeal, with one spine road through the whole site. If the site was developed incrementally, each stage must demonstrate that it will not prejudice the implementation of the others, this is particularly important for the western most parcel of land which does not have a suitable access. Following consultation ⁽¹²⁾, the preferred access arrangements would be for the main access/accesses to be from Sandwich Road with the emergency access from New Street. The final location of the access/accesses would ultimately be decided at the planning application stage. There would be no access onto Cherry Garden Lane as this would have a detrimental impact on the character of this road and the setting of the village.

3.207 The design and height of buildings would also be a consideration to avoid any detrimental impact on the setting of the village or the wider landscape. The retention of many of the existing hedgerows as well as other vegetation will be important to reduce this impact. The estimated capacity for the whole site is estimated at 95 dwellings.

Policy LA 17

Land to the South of Sandwich Road, Ash.

Planning permission for residential development on land between Cherry Garden Lane and 73 Sandwich Road (as defined on the Proposals Map) will be permitted provided that:

- i. there is a comprehensive approach to development of the whole site but if the site was developed incrementally, each stage must demonstrate that it will not prejudice the implementation of the others;
- ii. the retention of existing boundary hedgerows and vegetation;
- iii. the main access/accesses to be from Sandwich Road; and
- iv. no access of any type onto Cherry Garden Lane.

3.5.2 Capel-le-Ferne

3.208 Capel-le-Ferne's designation as a Local Centre reflects its role in serving other nearby settlements (i.e. Alkham and West Hougham). The Parish has a population of 1,650 people ⁽¹³⁾ and 790 dwellings ⁽¹⁴⁾.

3.209 Capel-le-Ferne is located in a prominent cliff-top position, with properties on the Old Dover Road having extensive views across the English Channel. The AONB is adjacent to the built form in a number of places at the edge of the village. The undeveloped land located between the sea and the Old Dover Road is also protected as Heritage Coast. As a consequence there are very limited development opportunities that would not damage the setting of the AONB or the character of the village itself.

3.210 Perhaps as a consequence of its countryside and coastal position, the settlement is a popular tourist destination. The settlement has three static caravan parks each with their own on-site facilities. In addition, a large number of visitors are attracted to Capel-le-Ferne to visit the Battle of Britain Memorial.

3.211 The settlement has a village hall, a primary school and two churches. A farmers' market operates each week from the village hall. Capel-le-Ferne's location, on the western fringe of the District, means that the town of Folkestone is used for many services and facilities. The Parish Council would welcome additional housing accompanied with improved infrastructure, including a doctor's surgery.

3.212 Two sites have been identified for residential development, which will provide approximately 100 dwellings. There is also one change to the Capel-le-Ferne Settlement Confines: In light of the issues associated with this site a specific site policy - Policy LA4 - is included. The allocated sites and the change to the confines are identified in the diagrammatic plan below and the following table.

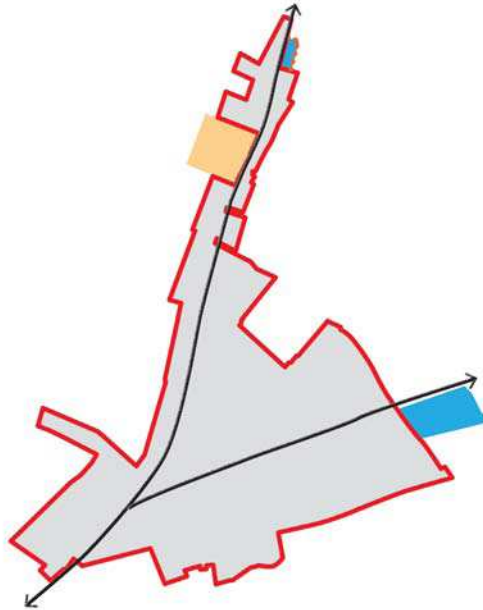


Figure 3.10 Diagram illustrating allocated sites and change in settlement confines in Capel le Ferne

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Land Allocated for Residential Development at Capel-le-Ferne			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road (LDF015)	Reinforce but not change an area's housing offer	50	Set out in Policy LA18
Land to the north of the junction of Capel Street and Winehouse Lane (CAP03)	Reinforce but not change an area's housing offer	Change to Settlement Confine	Set out in Policy LA19
Other Allocations/Changes to Confines			

Land Allocated for Residential Development at Capel-le-Ferne			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
<p>Site : Land between 107 & 127 Capel Street</p> <p>(SHL060)</p>	Reinforce but not change an area's housing offer	50	Retention of Hedgerows Impact on the setting of the AONB
Approximate total number of dwellings		100	

Table 3.7 Summary Table

Land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel le Ferne

Site location and characteristics

3.213 The site is located on the eastern edge of Capel-le-Ferne, and currently consists of mature trees and shrubs and public bridleway ER252 runs along the western boundary.

3.214 The site is classified as chalk grassland from the Kent Wildlife Habitat survey and is of national importance for biodiversity. The biodiversity interest lies in the southern part of the site but lack of management has led to it becoming scrubbed over.

Site context

3.215 Land immediately to the south of the site forms the coastline and is designated as Heritage Coast and AONB. The land to the north of the site is located in the AONB and is undeveloped countryside. To the east is existing residential development, and to the west a caravan park.

Proposed development

3.216 Although the biodiversity interest is in decline it still has potential which would be realised with appropriate management. Development of the northern part of the site would only be acceptable if it enabled the improvement and management of the chalk grassland in the southern half of the site.

3.217 Access to the site would only be acceptable from New Dover Road, with a right hand turning lane, provided it can be demonstrated that adequate sight lines can be achieved and turning movements safely accommodated. The number of dwellings would be restricted to fewer than 50, given that only a single point of access is envisaged.

Policy LA 18

Land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel le Ferne

Planning permission for residential development on land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel le Ferne (as defined on the Proposals Map) will be permitted provided that:

- i. the biodiversity quality of the chalk grassland at the southern part of the site is enhanced and maintained through long-term management arrangements;
- ii. a landscape buffer of planting is provided between the chalk grassland and the development;
- iii. a suitable access is achieved from New Dover Road; and
- iv. Bridleway ER252 is retained, or if necessary relocated.

Land to the north of the junction of Capel Street and Winehouse Lane, Capel le Ferne

Site location and characteristics

3.218 The site is located on the northern side of Capel-le-Ferne. It is located within the AONB and currently consists of rough grassland and unmanaged scrub. The Capel Street frontage in this location is defined by low density 1930s housing reflecting the village edge.

Site context

3.219 A hedgerow/bank provides the boundary the east and beyond this is open countryside located within the AONB. To the south and west of the site lie existing residential properties, and to the north is Hollingbury Farm which lies outside of the settlement confines.

Proposed development

3.220 The site is suitable for limited development, related to the existing built form along Capel Street, but should reflect the surrounding density and the design requirements of the AONB. The design and height of buildings should avoid any detrimental impact on the setting of the village, the AONB, or the wider landscape. The retention of the existing hedgerow will be important to reduce this impact.

3.221 The narrow width of the site would not foster a layout to include an internal access road. In order to reflect the urban form only frontage development would be permissible, with each dwelling accessed individually from Capel Street. In addition, the gardens would be predominately located to the side of each plot, given the narrowness of the site.

Policy LA 19

Land to the north of the junction of Capel Street and Winehouse Lane, Capel le Ferne

Planning permission for residential development on land to the north of the junction of Capel Street and Winehouse Lane (as defined on the Proposals Map) will be permitted provided that:

- i. the existing boundary hedgerows and vegetation is retained; and
- ii. each plot is accessed individually from Capel Street with a private parking area provided to the front

3.5.3 Eastry

3.222 Eastry is located in the northern part of the District in a rural location approximately 2.7km to the south west of Sandwich. The Parish has a population of 2,400 people ⁽¹⁵⁾ and 943 dwellings ⁽¹⁶⁾.

3.223 The village has a wide range of commercial and community facilities including a Doctor's surgery, primary school, church, village hall and a range of shops including a post office. Eastry is located just over 5km from the Discovery Park Enterprise Zone, which is located just north of Sandwich.

3.224 There are few nationally recognised constraints in the village, such as flood risk or AONB. The village does, however, have an extensive conservation area on the eastern side and it is in a highly visible location in the countryside.

3.225 To help sustain and strengthen Eastry's role in the settlement hierarchy, additional housing will be required. Two sites have been identified for residential allocations and there are three proposed changes to the confines. The allocations are in addition to the Eastry Hospital development, which has planning permission for eighty dwellings.

3.226 The two residential allocations will provide approximately 75 dwellings. One allocation and one settlement confines change are subject to site specific policies. The allocated sites and changes to the confines are identified in the diagrammatic plan below.

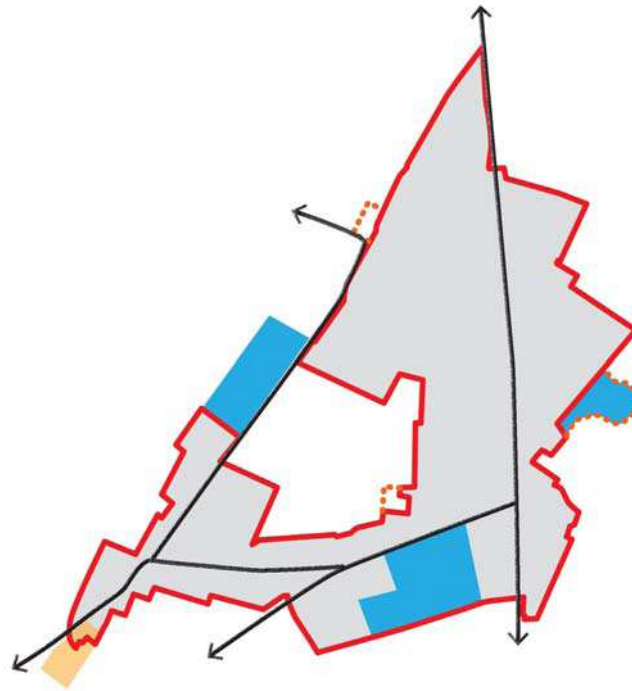


Figure 3.11 Diagram to illustrate allocated sites and changes to confines in Eastry

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Land Allocated for Residential Development at Eastry			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Gore Field, Gore Lane (SHL064)	Reinforce but not change an area's housing offer. Development should reflect the existing character while taking opportunities to improve design standards.	55	Set out in Policy LA20
Eastry Court Farm, St Mary's Close (SHL059/EAS02)	Reinforce but not change an area's housing offer. Any development would need to reflect the sensitive character of the rural location and the conservation area.	Change in Settlement Confines	Set out in Policy LA21
Eastry Hospital, Mill Lane	Reinforce but not change an area's housing offer. Development should reflect the existing character while taking opportunities to improve design standards.	80	Set out in Policy LA22
Other Allocations/Changes to Confines			

Land Allocated for Residential Development at Eastry			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
<p>Site : The Old Chalk Pit, Heronden Road (SHL025)</p>	<p>Reinforce but not change an area's housing offer. Development should reflect the existing character while taking opportunities to improve design standards.</p>	<p>20</p>	<p>Existing business use</p>
<p>Site : Land to the west of Gore Lane (EAS05)</p>	<p>Reinforce but not change an area's housing offer. Development should reflect the existing character while taking opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>Footpath</p>
<p>Approximate total number of dwellings</p>		<p>155</p>	

Table 3.8 Summary Table

3.227 In addition to the residential allocations and changes to the Settlement Confines set out in table 3.12, the confines have also been changed to include the business units to the rear of Coronation Cottage, Mill Lane. It is the Council's intention to retain the units for business purposes but if it can be demonstrated that such a use is no longer viable or appropriate (see Policy DM2 in the Core Strategy), then alternative development could be considered.

Land Allocated for Employment at Eastry			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
<p>Site : Units to rear of Coronation Cottage, Mill Lane</p> <p>(NS02EAS)</p>	Change of confines to include employment units.	Change to Settlement Confines	None

Table 3.9

Gore Field, Gore Lane

Site location and characteristics

3.228 The site lies on the western side of Eastry, fronting Gore Lane, and consists of agricultural land located between residential development at Albion Road, to the south, and Gore Farm (a Grade 2 Listed Building) to the north. There is no current boundary line along the western boundary of the site.

Site Context

3.229 The site lies on the edge of the built form of the village so that there is residential development to the south, east and north and open countryside to the west. The local primary school also lies to the east of the site. To the north there is Gore Farm, which consists of Listed Buildings that have been converted to residential.

Proposed development

3.230 Development should reflect the existing character while taking opportunities to improve design standards. Any development proposals will have to incorporate retain and enhance existing hedgerows to ensure that the visual impact on the neighbouring properties, in particular Gore Farm, a Listed Building, is reduced. A new landscaped boundary will need to be created along the western perimeter of the site.

3.231 In order to improve connectivity for pedestrians, any scheme should include an element of frontage development with a new footpath along Gore Lane to link with the existing footpaths. Access should be from Gore Lane as it would not be acceptable to use the adjacent development, Albion Road, as this is too narrow. To retain the character of the area and ensure that there is no disruption to the flow of traffic, measures should be implemented to ensure Gore Lane is free from parking. The estimated capacity of the site is estimated at 55 dwellings.

Policy LA 20

Gore Field, Gore Lane

Planning permission for residential development on land at Gore Lane (as defined on the Proposals Map) will be permitted provided that:

- i. there is provision for a footpath along Gore Lane;
- ii. the main access/accesses to be from Gore Lane;
- iii. the western boundary is established through landscaping; and
- iv. existing boundary hedgerows and vegetation are retained and enhanced.

Eastry Court Farm

Site location and characteristics

3.232 Eastry Court Farm is an irregular shaped site located on the eastern side of Eastry and is falling into disrepair. It consists of a large shed in the central area with silos and other smaller barns located to the west of the site. There is also open space on the site with mature trees. There are seven properties adjacent to the farm that have access across Eastry Court Farm.

Site Context

3.233 The site is in a particularly sensitive location, being on the edge of the village in a rural setting, with listed buildings (including Eastry Court and St Mary's Church) and mature trees on and adjacent to the site. All these contribute to the character of Eastry Conservation Area, in which the site is also partly within. To the west and north of the site there are residential properties.

Proposed Development

3.234 Development would improve the visual amenity and make better use of the land. It is envisaged that residential development could be accommodated on the site through the conversion of some of the existing farm buildings and through sensitive redevelopment. The farm buildings need to be retained as they contribute to the special rural character of the area, adding local distinctiveness and are a reference to the former use as a farm.

3.235 The redevelopment of the area where the large modern barn is currently located would have to ensure that the height, scale, massing, location and grain of any proposals would respect the sensitive nature of this farm and the setting of the adjacent heritage assets, both designated and undesignated, and the wider landscape. The diagram below sets out the main issues to be considered.

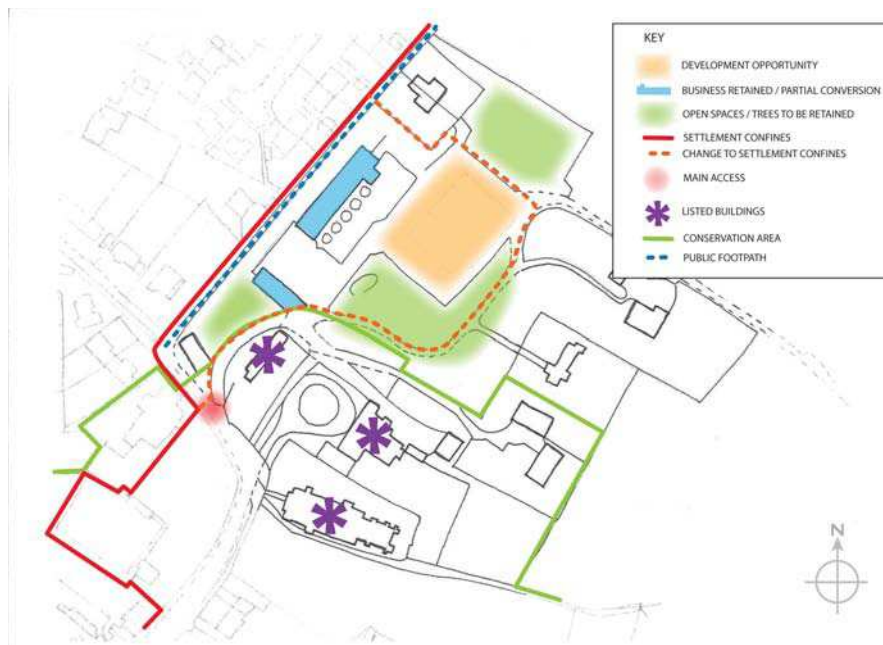


Figure 3.12 Opportunities and Constraints Eastry Court Farm

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3.236 Access to the site should only be via Church Street. Access from Brook Street would be unacceptable in highway terms. Should development trigger the need to bring the access road up to adoptable standards, great care would be needed with highway design to ensure compatibility with the historic environment.

3.237 The assessment of the heritage assets on this site in the Dover District Heritage Strategy, has identified that there are nine historic 'Themes' that would be affected by development on the site. These include 'Conservation Areas', 'Churches' and 'Saxon remains'. The Heritage Strategy should be used as the initial starting point for any proposal. The estimated capacity is less than five dwellings but this should not preclude proposals that can demonstrate that additional dwellings would not have a detrimental impact the sensitive nature of the site.

Policy LA 21

Eastry Court Farm

Planning permission for residential development on land at Eastry Court Farm, Eastry (as defined on the Proposals Map) will be permitted provided that:

- i. development is limited to the conversion of the traditional barns and through the redevelopment of the modern agricultural buildings, which respect the character and quality of the historic environment;
- ii. a suitable access is achieved onto Church Street; and
- iii. visual improvements are made to the remaining site area through landscaping and the retention of existing trees.

Eastry Hospital, Mill Lane

Site Location and Characteristics

3.238 Eastry Hospital is located on the southern edge of the village. The site consists of three former hospital buildings (located in the north eastern corner) and a central part of site that has been cleared of development and large area of open space to the rear of the site. The use of the site ceased some years ago, the buildings are now derelict and have been subject to fire damage and vandalism.

Site Context

3.239 The site is located in a sensitive location. The former workhouse, which fronts the site on Mill Lane, is a Grade II Listed Building. There are two other buildings on the site, the Chapel, which is within the Eastry Conservation Area, and former hospital building to the rear of the Chapel.

3.240 The surrounding uses consist of residential (to the north and east) sheltered housing (to the west) and open agricultural land, which falls away providing long distance views to the south. There is a public right of way (EE256) running along the southern boundary of the site.

Proposed Development

3.241 Development should reflect the existing historic character of the site while taking opportunities to improve design standards. The site was allocated in the 2002 Dover District Local Plan for a mixed use development. The policy restricted the number of dwellings to 40 due of traffic generation and highway capacity issues. Since that time the highway concerns have been addressed and the District Council has made a resolution to grant a mixed use planning application for up to 80 dwellings and the conversion of the existing buildings to offices or community uses.

3.242 The Employment Update (2012) has indicated that, in terms of the rural area, retaining an element of employment at Eastry Hospital is important for the geographical distribution of employment sites in the District. The retention of a element of employment is supported from a historic environment perspective as the former workhouse, which fronts Mill Lane, and the former hospital building, located behind the Chapel, do not lend themselves to residential conversion. Conversion would require changes to the fabric of the buildings which would be detrimental their historic character.

3.243 In recognition that the demand for specific B1 (business) uses has historically been low, the District Council will be supportive of other employment generating uses, wider than the B1 use classification, providing that they are compatible with the residential element of the development.

3.244 Development must preserve the listed building, its setting and features of architectural and historic interest and preserve or enhance the character or appearance of the Eastry Conservation Area. Provision must also be made for an archaeological evaluation in advance of any planning decision and for the consequent appropriate level of archaeological mitigation. The Heritage Strategy has identified five historic 'Themes' that should be considered as a starting point for any proposals. These Themes are 'Settlement', 'Archaeology', 'Listed Buildings', 'Undesignated Buildings' and 'Conservation Areas'.

3.245 Along the northern frontage, any development needs to respond positively to the prominent position in village and the historic nature of the site as the site is a dominant feature in the street scene and is within the Eastry Conservation Area. The site is also highly visible in the wider landscape when viewed from the south. Development along the southern boundary should ensure that there is a soft edge, such as through the use of landscaping and sensitive design.

3.246 In order to improve connectivity for pedestrians, any scheme should include a pedestrian connection between the existing public right of way that is located along the southern of the site and the Mill Lane. The estimated capacity of the site is 80 dwellings.

Policy LA 22

Eastry Hospital

Planning Permission for a mixed use scheme including residential, community and compatible employment generating uses on land at Eastry Hospital (as defined on the Proposals Map) will be permitted provided that:

- i. any proposals ensure that visual interest is not harmed, and provide for a soft loose knit interface between the site boundary and adjacent countryside and, in particular, provide for structural landscaping along the southern boundary of the site;
- ii. any road improvements arising from the development are funded by the developer and limited to works which are compatible with the historic environment;
- iii. that the traffic and highways issues can be satisfactorily addressed; and
- iv. planning applications for this site are supported by full details of existing and proposed buildings, landscaping, traffic impact and parking.

3.5.4 Shepherdswell

3.247 Shepherdswell's designation as a Local Centre reflects its role in serving other nearby settlements (i.e. Coldred, Eythorne and Elvington). Shepherdswell is the only Local Centre to have a mainline railway station with an hourly service to both London Victoria and Dover Priory. However, it is not served by the high speed service (HS1), and a connection would need to be sought from Dover Priory for this service. The Parish has a population of 1,750 people ⁽¹⁷⁾ and 743 dwellings ⁽¹⁸⁾.

3.248 Shepherdswell is located to the north of the A2, approximately seven miles from Dover town, and located at the western boundary of the District. The Parish boundary borders Canterbury City Council. The AONB is located to the west of the built form on Westcourt Lane. Any further development in a westerly direction has the potential to impact on the

setting of the AONB. There is one conservation area in Shepherdswell at the bottom of Church Hill, which includes the Church, a number of residential properties, and a small triangular green area.

3.249 The settlement has a number of services and facilities including a village hall, a primary school, a church, a medical centre, a Co-operative store, and a number of public houses. The East Kent Railway terminus is located adjacent to the mainline railway station; this heritage line was originally built to serve the colliery at Tilmanstone, and now provides a two mile long tourist service to Eythorne.

3.250 To help sustain and strengthen Shepherdswell's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. Two sites have been identified for residential development, which will provide approximately 30 dwellings. There is also one change to the Shepherdswell Settlement Confines and any proposed development on this site would need to take account of its Conservation Area setting. The allocated sites and the change to the confines are identified in the diagrammatic plan below and the following table.

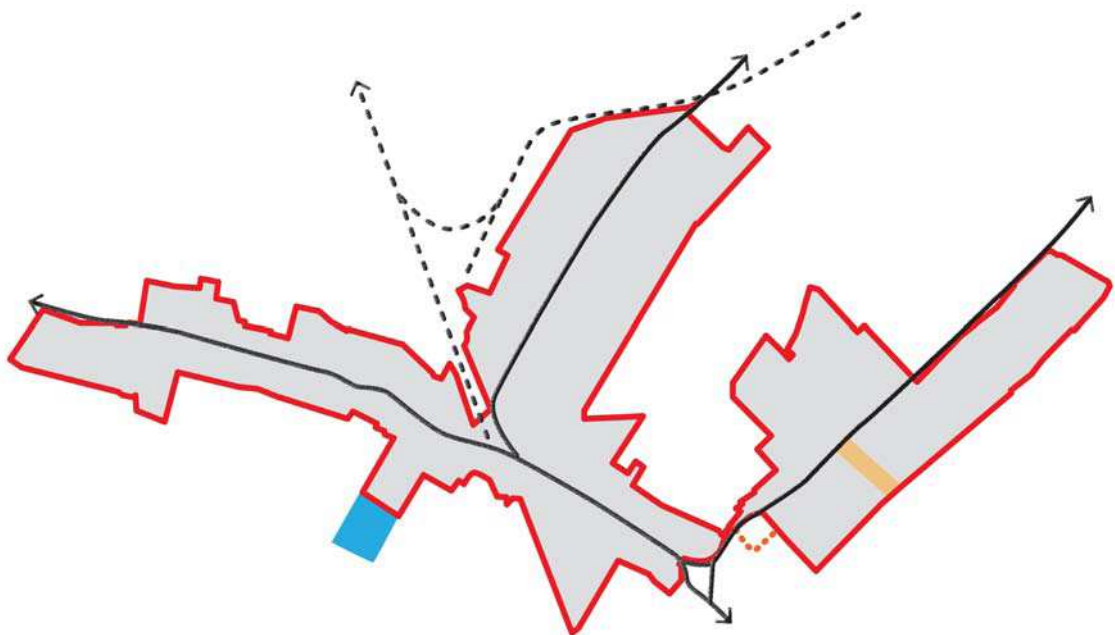


Figure 3.13 Diagram illustrating allocated sites and change in settlement confines in Shepherdswell

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Land Allocated for Residential Development at Shepherdswell			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land to the West of Coxhill (NS01SHE)	Reinforce but not change an area's housing offer. Opportunity to create an introduction to Shepherdswell	20	Set out in Policy LA23

Land Allocated for Residential Development at Shepherdswell			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
	through good urban design and enhanced boundary treatment.		
Other Allocations/Changes to Confines			
Site : Land off Mill Lane (LDF018)	Reinforce but not change an area's housing offer	10	Archaeology
Site : Land at 4 Mill Lane (SHE04V)	Reinforce but not change an area's housing offer	Change to Settlement Confines	Conservation Area
Approximate total number of dwellings		30	

Table 3.10 Summary Table

Land to the West of Coxhill, Shepherdswell

Site location and characteristics

3.251 The site is located to the south of Shepherdswell, on the main approach to the village from the A2. It is broadly square in shape, and forms part of a larger arable field. A public right of way (ER81) runs across the middle of the site from east to west.

Site context

3.252 The site is bounded by existing residential development to the north, and slopes downwards to the west where there is no natural boundary since site forms part of a larger arable field. The eastern boundary to Coxhill comprises a small hedgerow, and the village hall is located opposite the site. To the south lie a number of agricultural buildings forming part of Botolph Street Farm.

Proposed development

3.253 In order to achieve a satisfactory access, part of the roadside hedgerow would need to be removed and replaced behind the required sight lines.

3.254 Given that the site is located on the edge of Shepherdsweil any development proposal would need to establish a western boundary and enhance the southern boundary, to provide a soft edge to the village.

3.255 The existing PROW should be retained, or relocated, and integrated in an easterly direction to Moorland Road to enable connectivity to the Primary School. The landscape buffer should be established to create a western boundary broadly in line with the end of the rear gardens of the terraced properties located to the north. The site is estimated to have the capacity to accommodate 20 dwellings.

Policy LA 23

Land to the West of Coxhill, Shepherdsweil

Planning permission for residential development on Land to the West of Coxhill (as defined on the Proposals Map) will be permitted provided that:

- i. landscaping is provided to establish a western and southern boundary, and the frontage hedgerow is replanted behind the required sight lines;
- ii. public right of way ER81 is retained, or if necessary relocated; and
- iii. footway connections are established to connect to the existing network to the north, and if achievable to the Primary School.

3.5.5 Wingham

3.256 Wingham is located in the north western part of the District approximately 8km to the west of Sandwich. The village lies at the foot of Preston Hill in open countryside and has a small river, the Wingham, flowing through it. There are a high number of listed buildings in the village, the majority located along the High Street, and an extensive conservation area covering a large proportion of the settlement.

3.257 The Parish has a population of 1,600 people ⁽¹⁹⁾ and has 943 dwellings ⁽²⁰⁾. There are a wide range of commercial and community facilities including a dentist, surgery, primary school, church, village hall and a range of shops including a post office, serving the local and surrounding population.

3.258 To help sustain and strengthen Wingham's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. However, the issues that provide the village with its unique character; the heritage assets, the river (creating Flood Zones 2 and 3) and its location in the open countryside, all limit the development opportunities in the village.

19 2007 estimate
20 2001 Census

3.259 These constraints have resulted in only three changes to the confines to enable development of less than five dwellings in each case. These are illustrated on the plan below and listed in the following table.

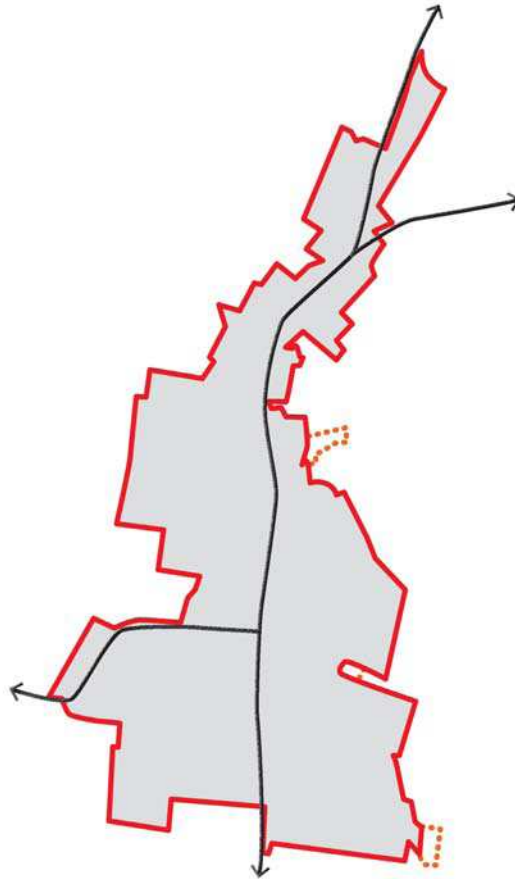


Figure 3.14 Diagram illustrating the changes to the settlement confines in Wingham.

Land Allocated for Residential Development at Wingham			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Other Allocations/Changes to Confines			
<p>Site : Builders Yard, 67 High Street (WIN02)</p>	<p>Reinforce but not change an area's housing offer. Development should reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>Conservation Area, Listed Buildings, Access</p>
<p>Site : Land North of College Way (WIN02C)</p>	<p>Reinforce but not change an area's housing offer. Development should reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>None</p>
<p>Site : Land to the south of Staple Road and north of Goodnestone Road (WIN03)</p>	<p>Reinforce but not change an area's housing offer. Development should reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>Access and landscaping</p>
<p>Approximate total number of dwellings</p>		<p>0*</p>	<p><i>*Assumed to be less than ten dwellings in total</i></p>

Table 3.11 Summary Table

3.6 Villages

3.6.1 East Langdon

3.260 East Langdon is located to the east of the Whitfield Urban Expansion Area, approximately three miles from Dover town. The Parish has a population of 580 people ⁽²¹⁾ and 239 dwellings ⁽²²⁾. The village is some distance from the AONB, which lies to the east of the A258 Dover to Deal road. The village comprises two distinct parts, each with settlement confines. The southern portion comprises the older part of the village, which is centred on the village green; adjacent to this is a pond. This part of the village is located within a Conservation Area, contains the Church and a number of Listed Buildings, and is characterised by large buildings in spacious grounds. Only a small part of the northern portion of the village is located within the Conservation Area. The remainder comprises more dense residential development characteristic of modern developments, and this is the focus of the facilities in the village (namely, the village hall/Post Office and primary school).

3.261 Some distance beyond the settlement confines to the north is the playing field and play area. Beyond this, located approximately half a mile from the village edge is Martin Mill mainline railway station. The railway station provides services to both London and Ramsgate, and is at present served by the high speed route (HS1). However, there are no pedestrian footways from East Langdon to Martin Mill.

3.262 To help sustain and strengthen East Langdon's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. One site has been identified for residential development, which will provide approximately 10 dwellings. The allocated site is identified in the diagrammatic plan below and the following table.

21 2007 estimate
22 2001 Census

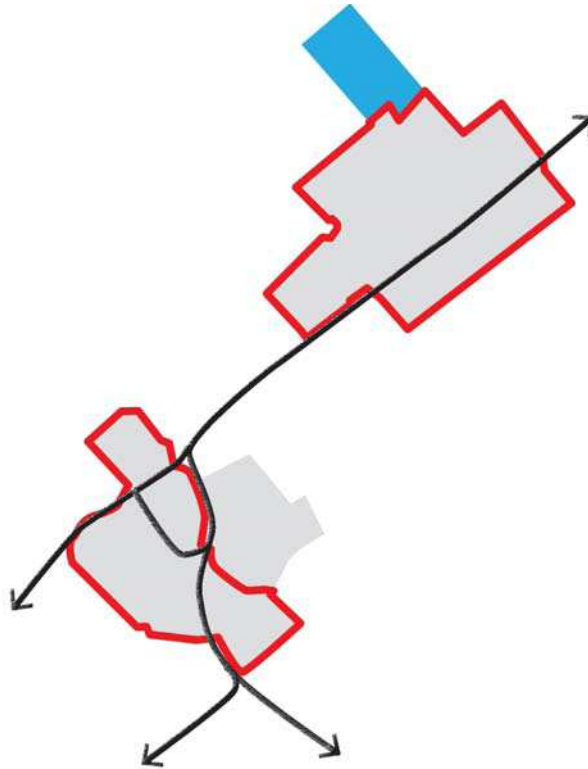


Figure 3.15 Diagram illustrating the allocated sites in East Langdon

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Land Allocated for Residential Development at East Langdon			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
North of Langdon Primary School (SHL035)	Reinforce but not change an area's housing offer	10	Set out in Policy LA24
Approximate total number of dwellings		10	

Table 3.12 Summary Table

North of Langdon Primary School, East Langdon

Site location and characteristics

3.263 The site is located at the end of a residential cul-de-sac on the eastern edge of the modern part of the village. It currently consists of unmanaged dense scrub and is visible in the wider landscape.

Site context

3.264 The site is surrounded by existing residential development to the south, the primary school to the west and agricultural land to the north and east. Aside from the boundary with the existing residential properties that are located off West side, the boundaries are formed of dense hedgerow.

Proposed development

3.265 The site is suitable for residential development to enable East Langdon to retain its position in the Settlement Hierarchy. This requires the protection of the existing boundary features which will help reduce the landscape impact of any development. The site is estimated to have the capacity to accommodate 10 dwellings.

Policy LA 24

North of Langdon Primary School, East Langdon

Planning permission for residential development on land to the North of Langdon Primary School (as defined on the Proposals Map) will be permitted provided that the existing boundary hedgerows/vegetation are retained.

3.6.2 East Studdal

3.266 East Studdal is located to the south west of Deal. It lies roughly between to the two settlements of Dover and Deal. Sutton Parish has a population of 740 people ⁽²³⁾ and 335 dwellings ⁽²⁴⁾. The village is some distance from the AONB, and is not located in an area at risk of flooding.

3.267 The village is linear in form and has a village hall, Sutton Parish Community Centre and a recreation ground. East Studdal Nursery is currently the largest business in the village, although we understand from the landowner that the intention is for this to cease shortly.

3.268 The site is well screened behind hedging/trees along the north and west boundary line. Any development proposal would need to ensure mature treescape and the soft edge to the village is retained. It is also hoped that through redevelopment there could be an opportunity to enhance the services and facilities on offer in the settlement.

3.269 One site has been identified for residential development, which will provide approximately 30 dwellings. There is also one change to East Studdal's Settlement Confines.

23 2007 estimate
24 2001 Census

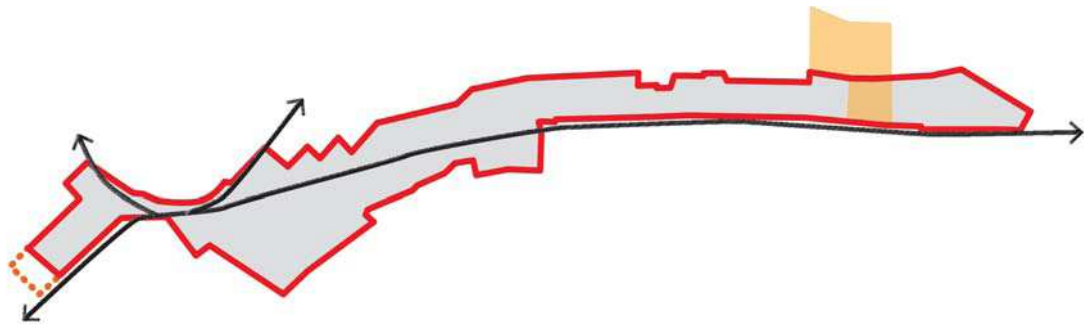


Figure 3.16 Diagram illustrating the allocated site and change in settlement confines in East Studdal

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Land Allocated for Residential Development at East Studdal			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Other Allocations/Changes to Confines			
<p>Site : East Studdal Nursery, Downs Road (LDF041)</p>	Reinforce but not change an area's housing offer	30	Retention of Hedgerows
<p>Site : Homestead Lane (NS03SUT)</p>	Reinforce but not change an area's housing offer	Change to Settlement Confines	
Approximate total number of dwellings		30	

Table 3.13 Summary Table

3.6.3 Elvington & Eythorne

3.270 Elvington and Eythorne are located to the north of the A2, approximately two miles to the north east of Shepherdswell which is a local centre which offers a large number of services and facilities. In light of the proximity of the two settlements, which are both located within Eythorne Parish, this Plan will set out proposals for each settlement in this section. The Parish has a population of 2,500 people⁽²⁵⁾ and 973 dwellings⁽²⁶⁾.

3.271 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 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.

3.272 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.

3.273 Eythorne has a number of services and facilities including a church hall, a primary school, three churches, a public house and a playground. Elvington has a medical facility, a small parade of shops (with hairdressers and takeaways) and a recreation ground. To the north east of the two settlements lies a sizeable industrial estate, which is primarily accessed from the A256 - the Dover to Sandwich Road, located beyond the industrial estate to the east. The Pike Road Industrial Estate offers a mix of units (B1/B2 and B8) of varying age; current occupiers include road haulage companies and Tilmanstone Salads.

3.274 To help sustain and strengthen Elvington and Eythorne's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. Two sites have been identified for residential development, which will provide approximately 75 dwellings. There is also one change to Eythorne's Settlement Confines. The allocated sites and the change to the confines are identified in the diagrammatic plan below and the following table.

25 2007 estimate
26 2001 Census

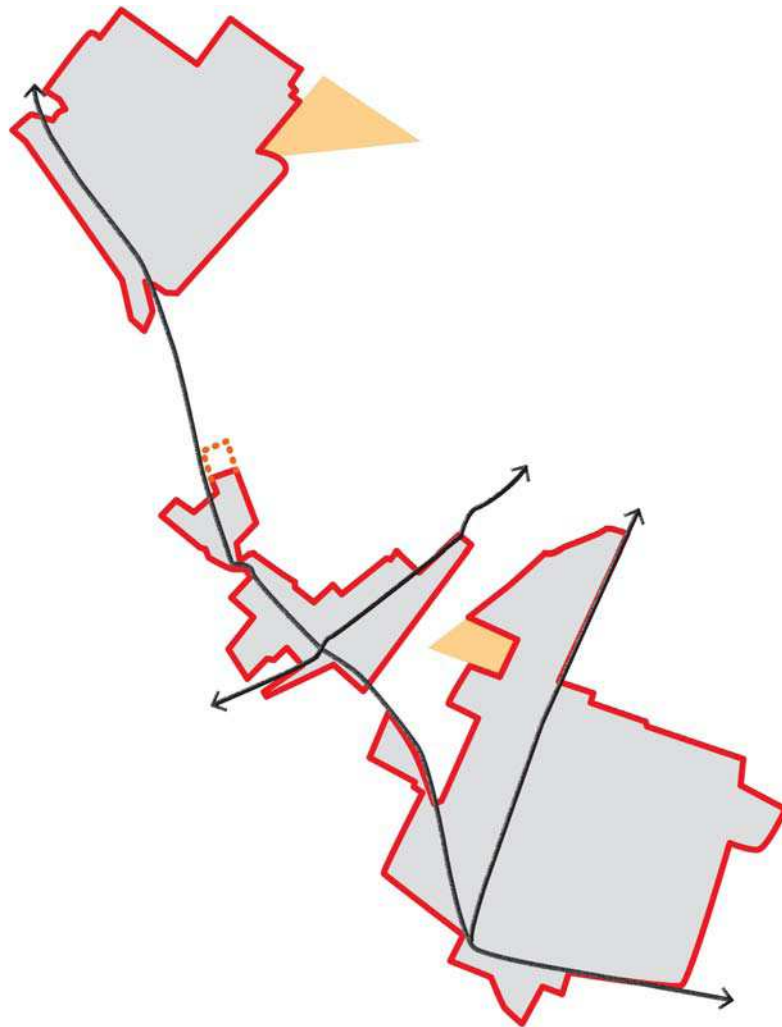


Figure 3.17 Diagram illustrating the allocated sites and changes in settlement confines in Elvington and Eythorne

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Land Allocated for Residential Development at Elvington and Eythorne			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Other Allocations/Changes to Confines			
<p>Site : Sweetbriar Lane, Elvington (SHL063)</p>	Reinforce but not change an area's housing offer	50	

Land Allocated for Residential Development at Elvington and Eythorne			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Site : Land to east of Adelaide Road, Eythorne (SHL031)	Reinforce but not change an area's housing offer	Change to settlement confines	None
Site : Land at Homeside, Eythorne (LDF01)	Reinforce but not change an area's housing offer	25	Ownership of access
Approximate total number of dwellings		75	

Table 3.14 Summary Table

3.6.4 Kingsdown

3.275 Kingsdown is located to the south of Deal, approximately three miles from Deal town centre. The Parish, which also includes Ringwould, has a population of 1,910 people⁽²⁷⁾ and 949 dwellings⁽²⁸⁾. Although the village is located immediately adjacent to the coast, the main focus of the village is further inland. The Oldstairs Bay Coastal Change Management Area (CCMA) is located along the coastline to the south of the village. This area is also protected as SSSI. Any development proposals which are located within the CCMA's would be assessed to ensure that only appropriate development that requires a coastal location, and provides substantial economic and social benefits, is permitted.

3.276 The AONB is located to the south and west of the built form, and any further development in a south-westerly direction has the potential to impact on the AONB. There is one conservation area in Kingsdown to the south east of the village which is focused on Upper Street.

3.277 The settlement has a number of services and facilities including a village hall, a primary school, a church, a medical facility, a village shop, a playing field with play area, and a number of public houses. Kingsdown International Camping Centre is located to the south east of the settlement confines, providing tourist accommodation in a 14 hectare campsite which occupies a cliff-top location.

3.278 To help sustain and strengthen Kingsdown's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. Two sites have been identified for residential development, which will provide approximately 15 dwellings. There is also one change to the Kingsdown Settlement Confines and any proposed development on this site would need to incorporate sufficient landscaping due to its visible location. The allocated sites and the change to the confines are identified in the diagrammatic plan below and the following table.

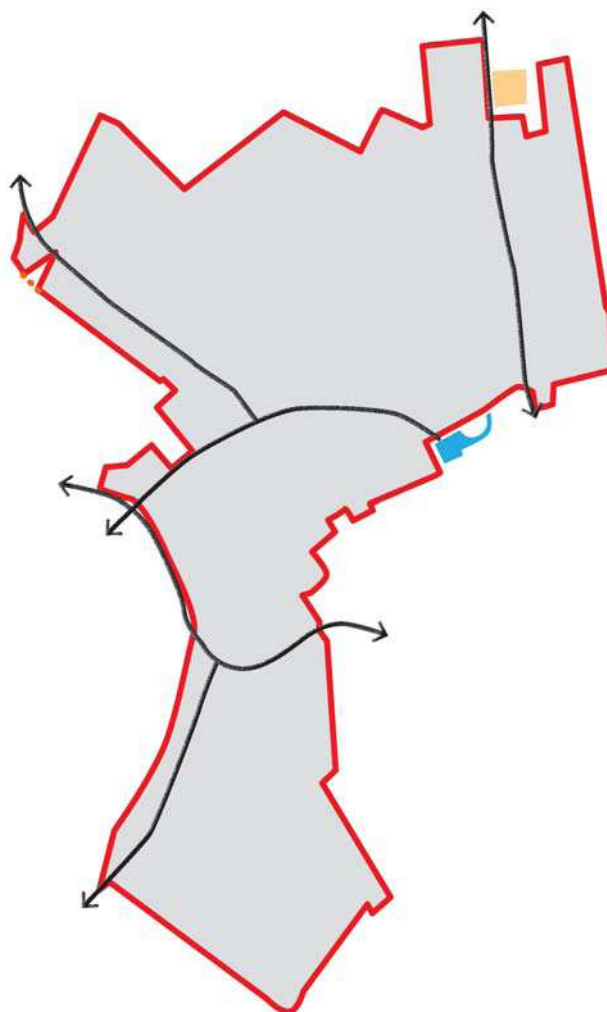


Figure 3.18 Diagram illustrating the allocated sites and changes in settlement confines in Kingsdown

Land Allocated for Residential Development at Kingsdown			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land between the village hall and The Bothy, Upper Street (LDF017)	Reinforce but not change an area's housing offer	7	Set out in Policy LA25
Other Allocations/Changes to Confines			
Site : Garage Site, Kingsdown Road (SAD28)	Reinforce but not change an area's housing offer	7	
Site : Land between Innisfree and Glen Lodge, Glen Road (KIN03C)	Reinforce but not change an area's housing offer	Change to Settlement Confine	Landscaping
Approximate total number of dwellings		14	

Table 3.15 Summary Table

Land between the village hall and The Bothy, Upper Street, Kingsdown

Site location and characteristics

3.279 The site is located close to the core of the village and was formerly used as a private car park. The site is overgrown with self sown sycamore trees and other mature trees. Trees along the boundary of the site are protected. This is a particularly sensitive site as it is located within the Kingsdown Conservation Area with part of the site in an elevated position.

Site context

3.280 A brick wall is located to the north, and beyond this lies residential properties on Upper Street. A holiday village/campsite is located to the south and residential properties, outside of the settlement confines, are located to the east. To the west lies the village hall, and beyond this residential properties.

Proposed development

3.281 The site offers the potential for limited residential development subject to a scheme coming forward which respects the special character of the area. Development should be restricted to the lower portion of the site, and the elevated areas should be restricted to garden land only. In order to protect the setting of the conservation area the existing wall fronting Upper Street together with all of the protected trees should be retained. The site is estimated to have the capacity to accommodate 7 dwellings.

Policy LA 25**Land between the village hall and The Bothy, Upper Street, Kingsdown**

Planning permission for residential development on Land between the village hall and The Bothy, Upper Street (as defined on the Proposals Map) will be permitted provided that:

- i. the wall fronting Upper Street is retained in its entirety;
- ii. the protected trees are retained; and
- iii. there is no built development on the raised area to the south of the site, although this land could be used as garden land.

3.6.5 Great Mongeham

3.282 Great Mongeham is located adjacent to the western edge of Deal and consists essentially of linear development along two rural roads; Northbourne Road/Mongeham Rd and Cherry Lane/Mongeham Rd. The village has a church; village hall; recreational grounds and is served by an hourly bus service to Deal. There is also an equine shop. The Parish has a population of 730 people ⁽²⁹⁾ and 302 dwellings ⁽³⁰⁾.

3.283 The village has two conservation areas, one centred on the Listed Buildings around and including the church (Northbourne Road), the other based around early Listed Buildings with terraces of nineteenth century housing fronting Mongeham Road.

3.284 Due to this, and the narrow rural lanes, there are few suitable development sites. Only one allocation for 10 dwellings and two changes to the settlement confines have been identified. The changes to the confines are to enable small scale redevelopment of two disused farms.

29 2007 estimate
30 2001 Census.

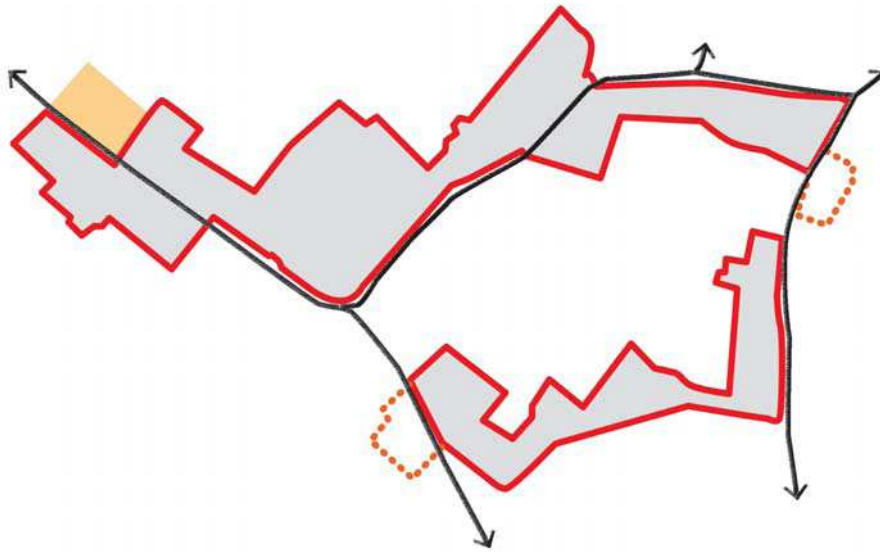


Figure 3.19 Diagram illustrating allocated sites and the change in confines in Great Mongeham

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Land Allocated for Residential Development at Great Mongeham			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Other Allocations/Changes to Confines			
<p>Site : Land at Northbourne Road (MON01C)</p>	<p>Reinforce but not change an area's housing offer. Development to reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>10</p>	<p>Retention of Hedgerows</p> <p>Creation of boundary to west and north</p> <p>Provision of new footpath fronting the site and connecting with existing path on Northbourne Road</p>
<p>Site : Great Mongeham Farm, Cherry Lane (MON02C)</p>	<p>Reinforce but not change an area's housing offer. Development to reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>Adjacent Listed Building</p>

Land Allocated for Residential Development at Great Mongeham			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
<p>Site : Mongeham Farm, Mongeham Road (MON04C)</p>	<p>Reinforce but not change an area's housing offer. Development to reflect the existing character of the area while taking any opportunities to improve design standards.</p>	<p>Change to Settlement Confines</p>	<p>Access Adjacent Listed Buildings Conservation Area</p>
<p>Approximate total number of dwellings</p>		<p>10</p>	

Table 3.16 Summary Table

3.6.6 Lydden

3.285 Lydden is located to the south of the A2, and is one of the closest settlements to Dover, being approximately two miles from the urban area. The Parish has a population of 680 people ⁽³¹⁾ and 274 dwellings ⁽³²⁾. The AONB is located to the south of the village and the Lydden and Temple Ewell Downs SAC, a SSSI and SPA, is located immediately to the north. Any further development in a southerly direction has the potential to impact on the AONB. The settlement has a number of services and facilities including a village hall, a primary school, a church, a medical centre, recreation ground, and a public house.

3.286 To help sustain and strengthen Lydden's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. One site has been identified for residential development, which will provide approximately 40 dwellings. This allocated site is identified in the diagrammatic plan below and the following table.

31 2007 estimate
 32 2001 Census

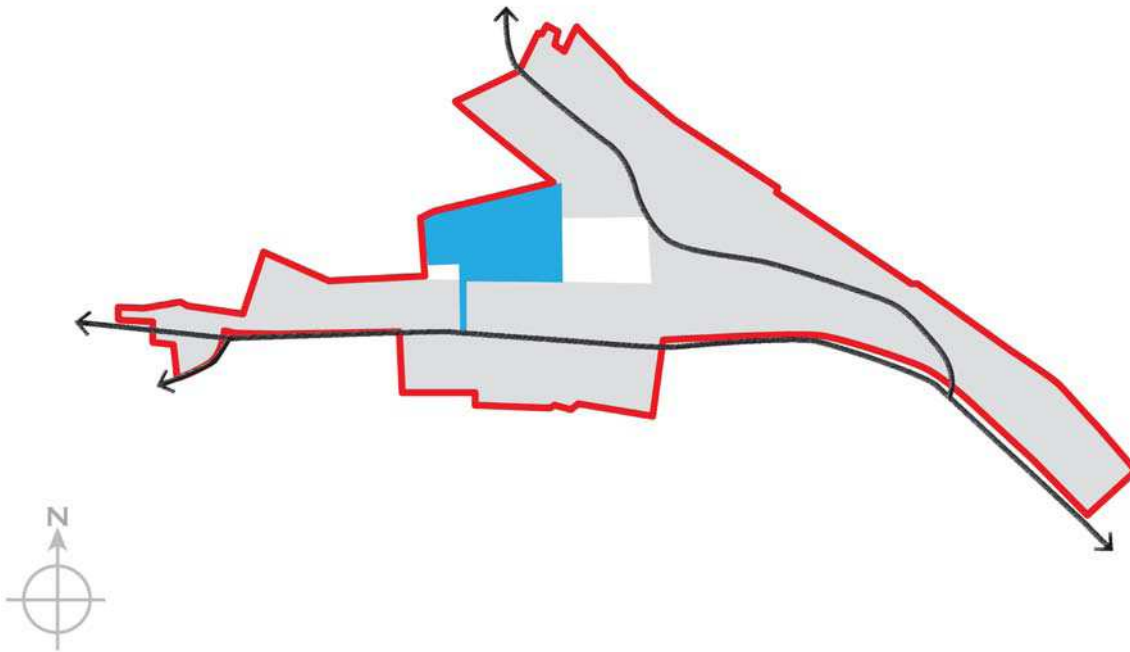


Figure 3.20 Diagram illustrating the allocated site Lydden

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Land Allocated for Residential Development at Lydden			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land at Canterbury Road (SHL042)	Reinforce but not change an area's housing offer	40	Set out in Policy LA26
Approximate total number of dwellings		40	

Table 3.17 Summary Table

Land at Canterbury Road, Lydden

Site location and characteristics

3.287 The site is located to the west of Lydden Primary School and on the northern edge of the village within the settlement confines. The site comprises rough grassland, which sits higher than the fields to the north, but is screened by trees which are protected. There is also substantial planting to other boundaries.

3.288 The site has the benefit of an existing access road which was built to serve the GP surgery, which is located to the west of the entrance. The initial outline planning consent also included planning permission for 24 residential units, although this permission has now lapsed and a new planning application would be required. In addition, the site includes an additional area of land, extending east of the land covered by the original outline permission.

Site context

3.289 To the north and east lies open countryside; the primary school and its playing fields are located to the west. Existing residential properties, which front Canterbury Road, are located to the south.

Proposed development

3.290 The western portion of the site contains an undevelopable woodland bank that should be maintained and enhanced for screening purposes and for biodiversity enhancement. There is potential for incorporating multifunctional SUDs within any proposed development.

3.291 The site lies adjacent to the Primary School and enhancements should be made to pedestrian and cycle connectivity to the existing network and if achievable to the Primary School. It is estimated to have the capacity to accommodate 40 dwellings.

Policy LA 26

Land at Canterbury Road, Lydden

Planning permission for residential development on Land at Canterbury Road (as defined on the Proposals Map) will be permitted provided that:

- i. the woodland bank to the north is maintained and enhanced; and
- ii. cycle and footway connections are established to connect to the existing network and if achievable to the Primary School.

3.6.7 Nonington

3.292 Nonington is located in the western part of the District, just over 1km to the east of Aylesham. There are no local shops but there is a primary school, hourly bus service, public house, church, village hall and a recreational ground. The parish has a population of around 980 people⁽³³⁾ and 323 dwellings⁽³⁴⁾.

3.293 The village has two conservation areas, Church Street (to the west) and Easole Street (to the east) and a high proportion of listed buildings.

3.294 One site has been allocated and there is one change to the Settlement Confines. The change in the confines reflect the outcome of an appeal decision. Both are in the eastern part of the village and are identified in the diagrammatic plan below and the following table.

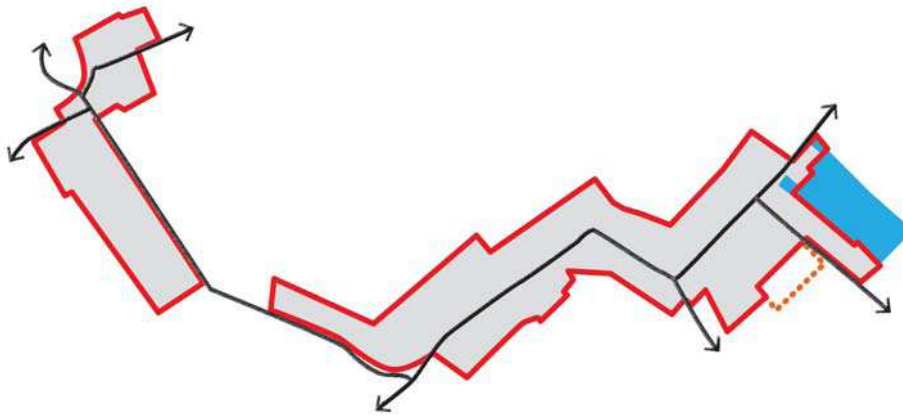


Figure 3.21 Diagram illustrating the allocation sites and changes to the settlement confines in Nonington

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Land Allocated for Residential Development at Nonington			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Prima Windows, Easole Street. (SHL015)	Reinforce but not change an area's housing offer. The site is located on the edge of the village but set behind existing development. Design should reflect the existing character of the area while taking any opportunities to improve design standards.	35	Set out in Policy LA27
Other Allocations/Changes to Confines			
Site : Land at Lynton, Mill Lane (NS01NON)	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area while taking any opportunities to improve design standards.	Change to Settlement Confines	Heritage Assets
Approximate total number of dwellings		35	

Table 3.18 Summary Table

Prima Windows, Easole Street, Nonington

Site location and characteristics

3.295 The site is located on the eastern edge of Nonington. It is rectangular in shape and consists of two large industrial buildings which are located on the north western half of the site and open space at the south eastern half. The site is screened from the open countryside by a line of mature trees along the north eastern boundary.

Site Context

3.296 The site is on the edge of Nonington and has residential development to the south and east and open countryside to the north and west. The site is adjacent to a Conservation Area and four listed buildings; one which is located adjacent to the main entrance of the site.

3.297 The company operating here has indicated that they are looking to relocate so that they can expand their business and the development of the site would enable this move. The current site provides off street parking for workers for approximately 20 to 25 cars but this is not sufficient and cars overspill and park along Easole Street which is at the entrance to the site.

Proposed development

3.298 Development should reflect the existing character of the area while taking any opportunities to improve design standards. It is considered that development of this site could enhance the setting of the Listed Buildings and Conservation Area with removal of industrial buildings. Any development would, however, have to reflect current grain and density of existing development in the village. The Heritage Strategy has indicated that there are four Heritage 'Themes' that should be considered as a starting point for any development proposals. These are 'Settlement', 'Archaeology', 'Listed Buildings' and 'Conservation Areas'.

3.299 The line of mature trees along the north eastern boundary must be retained to reduce the impact of the built form on the wider landscape and to retain a soft edge to the village. The estimated capacity for this site is 35 dwellings.

Policy LA 27

Prima Windows, Easole Street, Nonington

Planning permission for residential development on land at the Prima Windows site, Easole Street (as defined on the Proposals Map) will be permitted provided that:

- i. the existing boundary hedgerows and vegetation is retained; and
- ii. development reflects the density of the surrounding development.

3.6.8 St Margaret's

3.300 St. Margaret's at Cliffe's is located to the east of Dover, and is roughly midway between Dover and Deal. The parish has a population of around 2,380 people ⁽³⁵⁾ and 1,176 dwellings ⁽³⁶⁾. The village is divided into two main parts St. Margaret's at Cliffe and St. Margaret's Bay each with their own settlement confines. To the west of the main part of St. Margaret's at Cliffe lies Nelson Park, with its own settlement confines, however no services and facilities are located here. The AONB is located along the majority of the village edge, aside from the area of land which acts as visual separation between St Margaret's at Cliffe and St. Margaret's Bay, with areas to the west, including Nelson Park, located within the AONB. This means that there are very limited development opportunities that would not harm the setting of the AONB or the character of the village.

3.301 St. Margaret's Bay is located in a prominent cliff-top position, with properties on Beach Road, Bay Hill and Hotel Road having extensive views of the English Channel. The Hope Point to St. Margaret's Coastal Change Management Area (CCMA) is located along the coastline to the east of the village. This area is also protected as SSSI and Heritage Coast. Any development proposals within the CCMA would need to be assessed to ensure that only appropriate development, that requires a coastal location, and provides substantial economic and social benefits, is permitted.

3.302 There are two conservation areas, one encompassing the older parts of St. Margaret's at Cliffe, and the second located to the east and focused on the loose urban grain with areas of open space associated with the coastal area of St. Margaret's Bay.

3.303 The settlement has a number of services and facilities including a village hall, primary school, church, medical facility, village shop, playing field with play area, numerous public houses, tea rooms, country club, and a conference centre. St. Margaret's Bay Holiday Park is located to the south west of the settlement confines, and provides tourist accommodation (static caravans) in a resort with on-site facilities which include leisure facilities, restaurant and shop.

3.304 To help sustain and strengthen St. Margaret's at Cliffe's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. One site has been identified for residential development, which will provide approximately 7 dwellings. There is also one change to the St. Margaret's at Cliffe Settlement Confines and any proposed development on this site would need to incorporate sufficient landscaping due to its visible location. The allocated site and the change to the confines are identified in the diagrammatic plan below and the following table.

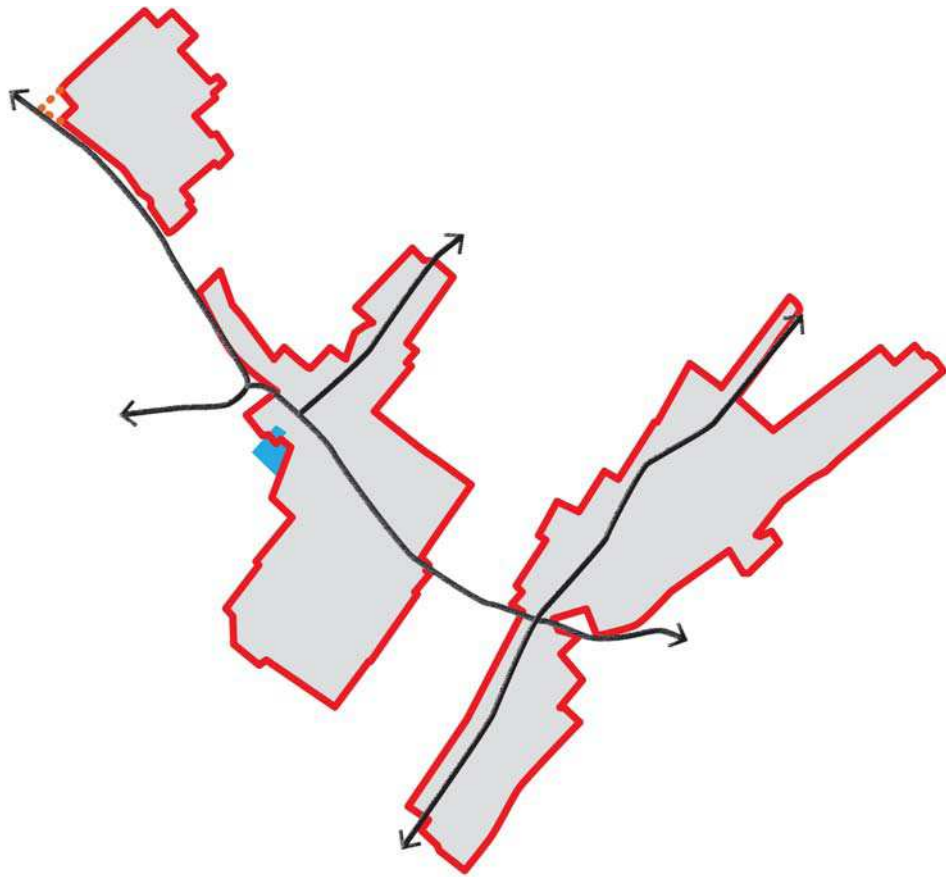


Figure 3.22 Diagram illustrating the allocated sites and changes in settlement confines in St Margaret's

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Land Allocated for Residential Development at St. Margaret's at Cliffe			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
The Paddock, Townsend Farm Road (NS03STM)	Reinforce but not change an area's housing offer	7	Set out in Policy LA28
Other Allocations/Changes to Confines			
Site : Land at the junction of Station Road and Nelson Park Road (STM03)	Reinforce but not change an area's housing offer	Change to Settlement Confines	AONB, landscaping
	1144		

Land Allocated for Residential Development at St. Margaret's at Cliffe			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Approximate total number of dwellings		7	

Table 3.19 Summary Table

The Paddock, Townsend Farm Road, St Margaret's at Cliffe

Site location and characteristics

3.305 The site is located to the south of St. Margaret's at Cliffe outside, but immediately adjacent to, the AONB. The site includes both numbers 1 and 2 Townsend Farm Road which comprise non-descript bungalows constructed in the 1950s/1960s. To the rear of number 2, but within the site is a paddock which comprises managed grassland. Land to the southern and eastern boundaries rises by approximately 3 metres, with mature trees along the southern boundary.

Site context

3.306 Abutting the site to the south is Ash Grove, a rural exceptions scheme which is located within the AONB. The very nature of this site means that it is located and will remain outside of the settlement confines. The site is bounded by existing residential development to the north and east. Beyond Townsend Farm Road to the west lies open countryside located within the AONB.

3.307 Although the site lies outside of the St. Margaret's at Cliffe Conservation Area, the boundary is adjacent to 1 Townsend Farm Road.

Proposed development

3.308 Given that land on the south east and south western boundaries of the paddock rises by a couple of metres, in order to reduce the impact on the nearby conservation area, this land should remain undeveloped. The existing trees located along the boundary help to screen Ash Grove from the village, and these should be retained as part of any development proposals for the site.

3.309 The diagram below sets out the constraints and opportunities which would need to be taken into account in any development proposal. Based on this, the site is estimated to have the capacity to accommodate 7 dwellings.

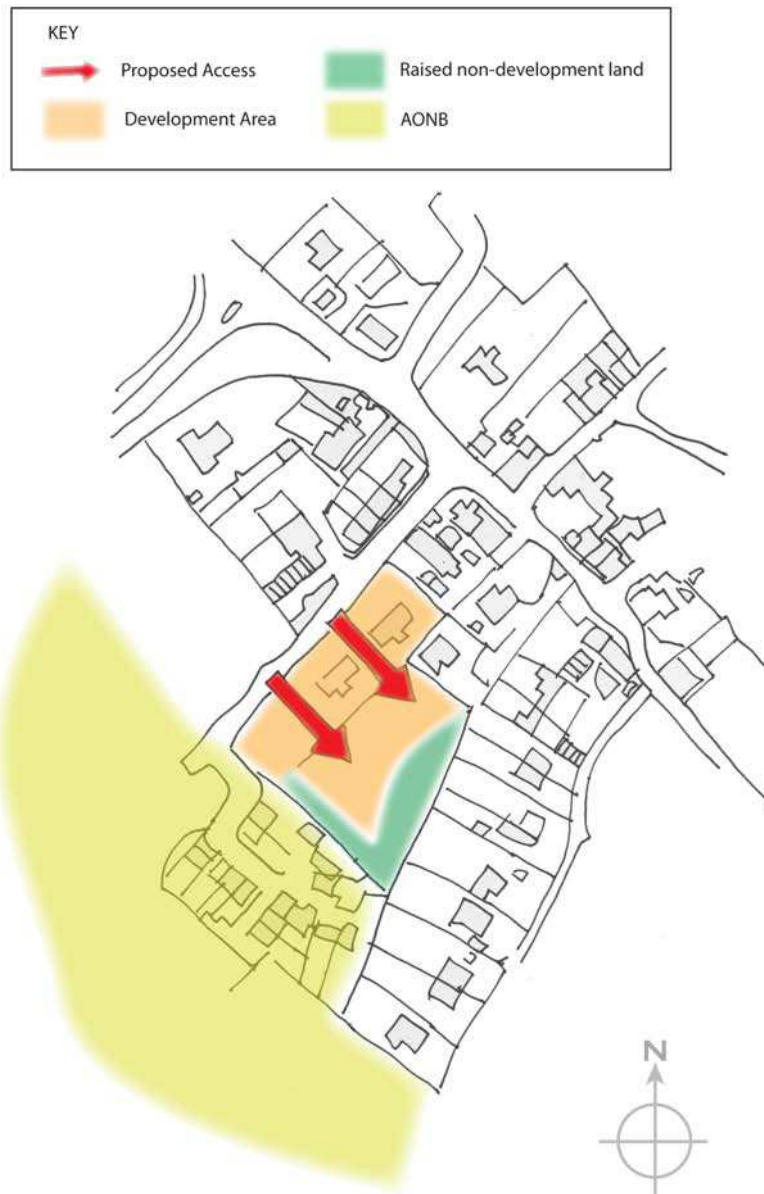


Figure 3.23 Constraints and Opportunities

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Policy LA 28

The Paddock, Townsend Farm Road, St Margaret's at Cliffe

Planning permission for residential development at The Paddock, Townsend Farm Road (as defined on the Proposals Map) will be permitted provided that:

- i. the raised land to the south east and south west is left undeveloped;
- ii. the existing trees along the southern boundary are retained.

3.6.9 Staple

3.310 The village of Staple is located in the north of the district, approximately 2km south west of Ash and east of Wingham. Barnsole, a hamlet, lies to the east of the village.

3.311 The majority of the village facilities are community based and consist of a Church, recreational ground, public house and village hall. The village also has an hourly bus service. The population of the village is approximately 590 people ⁽³⁷⁾ and there are 220 dwellings ⁽³⁸⁾ in the Parish.

3.312 To help sustain and strengthen Staple's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. The opportunity for further development in Staple is limited by its rural character and the setting of listed buildings.

3.313 The Plan has identified a change in the Settlement Confines to the land adjacent to Orchard Lea, The Street. This would enable low density development, consisting of one or two dwellings, reflecting the character of the surrounding area. The rural character of The Street, leading to St James Church, a Grade 1 listed building, and White Gate, a Grade 2 listed building, need to be protected and retained. An integral part of the rural character is the hedgerow that is located along the frontage of the land. This should be retained unless its removal is required for access. The change to the confines is identified in the diagrammatic plan below and the following table.

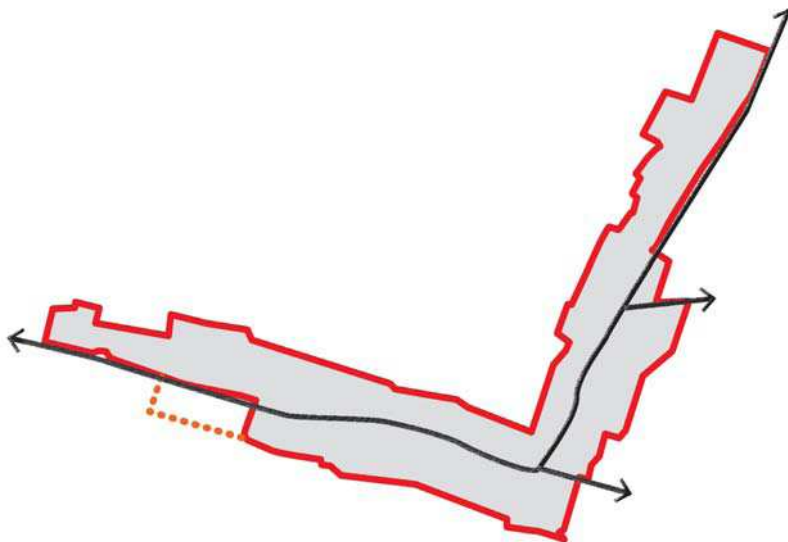


Figure 3.24 Diagram illustrating changes to the settlement confines in Staple

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Land Allocated for Residential Development at Staple			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Other Allocations/Changes to Confines			
Site : Land to the west of Orchard Lea, The Street (STA01C)	Reinforce but not change an area's housing offer. Development should reflect the existing character of the area while taking any opportunities to improve design standards.	Change to Settlement Confines	Retention of Hedgerows Adjacent Listed Buildings Density of Development
Approximate total number of dwellings		0*	* Assumed to be less than five dwellings in total

Table 3.20 Summary Table

3.6.10 Woodnesborough

3.314 Woodnesborough is located in the northern part of the district located in close proximity to Sandwich, which lies to the east, and 1.5km from Ash to the north west. The village is in two distinct parts, the western part includes the church and the current recreation ground, the eastern part the public house and village hall. The village hall is, however, considered no longer fit for purpose and the Parish Council is actively seeking a new location for a village hall and a new recreation ground.

3.315 The two parts of the village are approximately 100m apart and are separated agricultural fields. Both parts of the village are served by an hourly bus route. The population of the parish is 1,030 ⁽³⁹⁾ and there are 420 dwellings ⁽⁴⁰⁾.

3.316 To help sustain and strengthen Woodnesborough's role in the settlement hierarchy, it is considered that additional housing will be required over the lifespan of this Plan. Opportunities for further development in Woodnesborough are limited due to the impact on the wider landscape and the setting of the listed buildings in the village.

3.317 Two sites have been identified for residential development and these will provide approximately 40 dwellings. The allocated sites are identified in the diagrammatic plan below and the following table.

39 2007 estimate
40 2001 Census

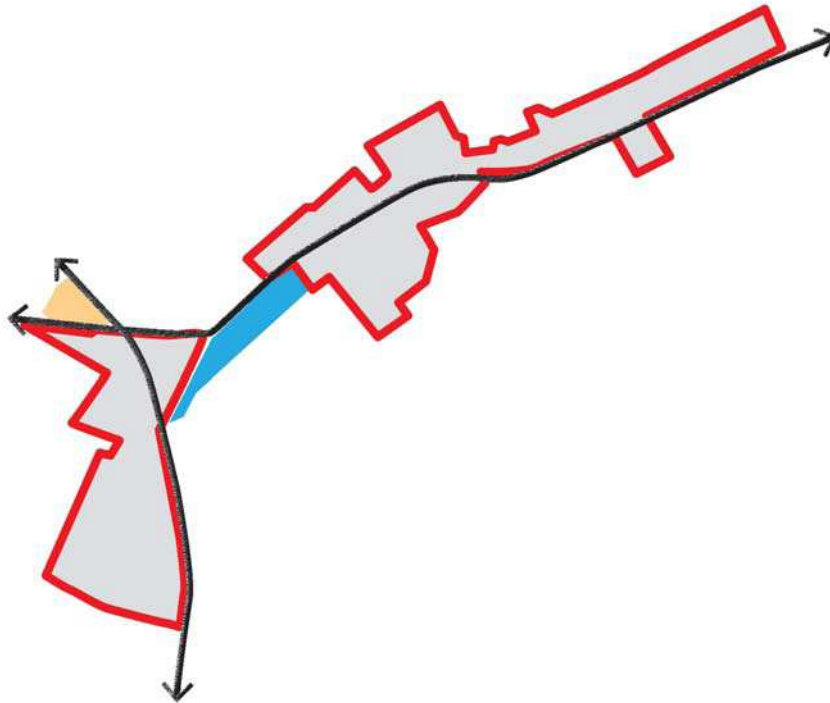


Figure 3.25 Diagram illustrating allocation sites in Woodnesborough

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Land Allocated for Residential Development at Woodnesborough			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Land Between Stoneleigh and Nine Acres, The Street (SHL048)	Reinforce but not change an area's housing offer. Design should reflect the existing character of the area while taking any opportunities to improve design standards.	30	Set out in Policy LA29
Other Allocations/Changes to Confines			
<p>Site : Land at Laslett's Yard and adjacent land</p> <p>(SHL093 & LDF03)</p>	<p>Reinforce but not change an area's housing offer. Design should reflect the existing character of the area while taking any opportunities to improve design standards.</p> <p>1149</p>	13	<p>Retention of Hedgerows</p> <p>Comprehensive development</p>

Land Allocated for Residential Development at Woodnesborough			
Site / Ref No.	How it meets the Core Strategy requirements	Approx No. Of Dwellings	Issues
Approximate total number of dwellings		43	

Table 3.21 Summary Table

Land Between Stoneleigh and Nine Acres, The Street

Site location and characteristics

3.318 The site is centrally located in the village on land to the south of The Street, which separates the two parts of the village. The site is irregular in shape and is long and narrow. It consists of agricultural land contained by a hedgerow that is located along the length of The Street and the rear of the site. There is also a bank, which increases in height southwards, between The Street and the site.

Site Context

3.319 There is open countryside to the north west and south east of the site and residential to the north, north east and to the south west. St Mary's Church, a Grade II listed building, is located to the south. The existing village hall, which is Grade II listed, is located to the north of the site.

Development Proposal

3.320 Development should reflect the existing character of the area while taking any opportunities to improve design standards. It is considered that development in this location would provide residential dwellings in the village to reinforce but not change an area's housing offer along with a new village hall and recreation ground. Any development needs to address and take into account the sensitive location of the site.

3.321 The hedgerows that surround the site are considered important for retaining the rural character and reducing any detrimental impact on the wider landscape. These should be retained as part of any proposed development unless removal of part of the hedge is required for access.

3.322 The design and layout of any proposals should consider the setting of the village hall, a Grade II Listed Building, and the existing built form, particularly the density and scale. This is to ensure that the rural character of the village is maintained. In particular, the access point onto the site and associated visibility splays, should be located to minimise impact on the heritage asset. The Heritage Strategy has identified six heritage 'Themes' of outstanding significance, including 'Churches' and 'Listed Buildings', that should be considered as a starting point for any development proposals.

3.323 Development would also need to provide a public footpath along The Street but this should not be to the detriment of the rural character of the road or through the loss of the hedgerow. Locating the footpath within the site is considered to be the preferred option to overcome this.

3.324 The development of this site provides an opportunity for a new village hall and recreation ground in a central location easily accessible to the local community and is an integral part of releasing this site for development. The estimated capacity for this site is 30 dwellings.

Policy LA 29

Land between Stoneleigh and Nine Acres, The Street, Woodnesborough

Planning permission for residential development on land Between Stoneleigh and Nine Acres, The Street will be permitted provided that:

- i. the existing trees, hedgerows and vegetation on the site are retained unless removal is required for access;
- ii. access is from The Street;
- iii. provision of a public footpath along The Street is within the site;
- iv. development reflects the density and scale of the existing built form; and
- v. a village hall and recreational ground is provided for the Parish Council and the residential element does not prejudice the implementation of this.

4 Phasing, Delivery and Monitoring

4.1 There is a formal requirement for the Council to produce an Annual Monitoring Report. Copies of the Council's Annual Monitoring Report can be downloaded from the Council's website.

4.2 The Council will consider the outcomes of the Annual Monitoring Report and whether this indicates the need to review existing plans, or to produce any additional ones. Any such changes have to be set out in the Council's Local Development Scheme. Should monitoring find that progress is insufficient to meet targets it does not automatically mean that a review of a Plan should take place. Where targets are not being met the Council will identify the relevant issues, analyse the problem and propose remedial action if necessary.

Annex 1 Development Management Guidance and Policy

1.1 Proposals for development will be judged against all relevant policies in the Development Plan. The Development Plan consists of the District Local Plan, which currently consists of this Plan, the Core Strategy and saved elements of the 2002 Local Plan, and the Kent Minerals and Waste Local Plan produced by Kent County Council. In addition all Local Plans must take full account of national policies set out in the National Planning Policy Framework (NPPF), together with requirements of planning legislation.

1.2 This section is a continuation of the Development Management Annex in the Core Strategy, and must be read in conjunction to ensure that all issues are considered as part of any planning application. The policies in this Annex run consecutively from the Core Strategy Development Management policies and, therefore, start at Policy DM26.

New Comparison Provision

1.3 As outlined in Chapter 2 (Overarching Policies) the Dover District Retail Update (2012) has identified a need for comparison floorspace in Deal. This amounts to a requirement for 7,700 square metres of gross floorspace by 2026. For further details please see Table 2.1 and paragraphs 2.11 to 2.19.

Policy DM 26

Provision of Comparison Floorspace in Deal

Planning permission for comparison goods shopping at Deal will be permitted provided that the sequential test set out in national planning policy has been followed. Should it be demonstrated through this test that no suitable town centre site can be identified and, following that, there is no appropriate edge-of-centre site an out-of-centre site will be permitted provided that all the following criteria are met:

- i. It is in an accessible location that is well connected to the town centre
- ii. Opportunities are taken to maximise the use of sustainable transport modes
- iii. Any proposal of more than 500 square metres gross floorspace is not likely to have a significant adverse impact on committed or planned town centre investment, nor on town centre vitality and viability
- iv. The proposals are in accordance with development plan policies to protect and enhance the environment

1.4 Proposals for development over 500 square metres of gross floorspace should be accompanied by an impact assessment.

Guidance on Heritage Assets

1.5 The NPPF sets out the Government's policy stance to be considered as part of any planning application and this is considered to be sufficient not to warrant specific heritage asset policies in this Plan. The NPPF states, however, that Local Planning Authorities should require applicants to describe the significance of any assets affected, including any contribution made by its setting.

1.6 The Dover District Heritage Strategy sets out thirteen broad themes to categorise the numerous individual or groups of assets in the district and has also assessed their significance. The Heritage Strategy will, therefore, assist applicants in assessing the significance of an asset and to effectively report this in their accompanying Heritage Statement.

1.7 This Plan will, in addition provide additional support to the Heritage Strategy by;

- Promoting a better understanding of heritage assets in the District
- Providing guidance for owners of Heritage Assets; and
- Providing guidance to help make planning decisions.

Promoting better understanding of Heritage Assets

1.8 A key component of the Heritage Strategy is to promote a greater understanding by the Local Authority, landowners and local people of the heritage assets in the District. One of the best ways of raising appreciation of the historic environment, developing a sense of place for communities and helping to sustain and realise the benefits of heritage assets is to engage and enable local people and groups to take a leading role in heritage activities.

1.9 Whilst many actions are outside the remit of this Plan, the Heritage Strategy has identified two crucial areas where further study and survey, by local groups, would be of benefit. These are Conservation Area Character Appraisals and the production of a Local List of Heritage Assets.

1.10 It is envisaged that the assessment work would be completed by the local community with agreement by the District Council. To ensure that the assessments are of a common standard, the District Council will be working with the community to draft guidance notes. These will be based on best practice, such as that produced by English Heritage.

1.11 Each Conservation Area Character Appraisal could also start to identify a Local List of Heritage Assets. The NPPF states that non-designated heritage assets should be taken account of when considering planning applications. A local list would enable the importance of undesignated local heritage assets to be taken into account in the processing of any planning applications, which have an impact on them and their setting.

1.12 The criteria for identifying Heritage Assets for a Local List are as follows:

Criteria for Local List Selection

A local List of Heritage Assets will include buildings, structures, landscape and archaeological features, which are of local interest, and have no statutory designation. For inclusion within the Local List, the Heritage Asset must comply with at least one of the criteria listed below:

Historic Interest. This can include:

- Association with a figure or event of significant local or national importance.
- Buildings relating to traditional or historic 'industrial' processes.
- Age and use of distinctive local characteristics.
- Archaeological importance.

Architectural and Artistic Interest. This can include:

- Buildings of high quality design, displaying good use of materials, architectural features and styles and distinctive local characteristics, which retain much of their original character.
- Designed by an architect or engineer of local or national importance.
- Demonstrating good technological innovation.
- Good quality modern architecture.

Social, Communal and Economic Value. This can include:

- Reflecting important aspects of the development of a settlement.
- Demonstrating an important cultural role within the community.
- Places which are perceived to be a source of local identity, distinctiveness, social interaction and coherence.
- Demonstrating links to a significant local industry or trade.

Townscape Character. This can include:

- Providing a key local or national landmark.
- Of significant townscape or aesthetic value.
- Playing an integral role within a significant local vista or skyline.
- Groupings of assets with a clear visual, design or historic relationship.
- Part of a locally important designed landscape, park or garden.
- Providing a good example of early local town planning.

Guidance for owners of Heritage Assets

1.13 Chapter 5 of the Heritage Strategy identifies many reasons why assets may be vulnerable. These range from natural processes to criminal actions. From a development perspective risks to heritage assets include house building, change in landuse, flood and coastal defence works, alteration or economic decline and neglect.

1.14 The NPPF suggests that local planning authorities should set out a positive strategy for heritage assets most at risk through neglect or decay and setting out their significance. Chapter 6 of the Heritage Strategy sets out the opportunities that are available and provides a positive approach to ownership.

1.15 The Heritage Strategy has identified how assets can add value to new developments by:

- *Creating a sense of place:* it adds character and distinctiveness to towns and villages that may be otherwise essentially similar.
- *Re-use of heritage assets:* Re-using existing buildings is a simple way of achieving sustainability whilst bringing the added benefit of reinforcing the sense of place that they engender.
- *Adding value to new development:* There are examples of heritage-led developments that are among the most prestigious and sought after.
- *Durability of regeneration:* By integrating development into the historic 'framework' of a place it acquires a greater sense of belonging and thereby resilience. The historic features also help to break up the development's design thus creating 'breathing space' in contrast to developments without heritage features which can often appear monotonous.

1.16 The Heritage Strategy also identifies tourism opportunities and considers each of the 'themes' and how these could contribute. While the key sites should remain an important part of the District's promotion, additional emphasis should be placed on demonstrating that there is a lot more to offer and encourage more overnight and longer stay trips to the District. With people increasingly wanting more diverse experiences from their days out and holidays, promotion of the heritage assets alongside natural environment and cultural assets may strengthen the draw.

Guidance for Planning Decisions

1.17 The Heritage Strategy is clear that the historic environment should be embraced as an important element in proposals for both regeneration and in new development. Key components identified are:

- Helps to develop a strong 'sense of place' and identity for existing and new communities;
- Helps to shape new development and this would also be reflected in any master plans;
- The reuse of heritage assets is sustainable as the buildings have already been constructed.

1.18 It is therefore, essential that developers consider heritage assets from the outset in their proposals and that sound Heritage Statements are produced as an integral part of the planning application, describing the significance of any heritage assets affected. Poor Heritage Statements have resulted in delays to planning applications.

1.19 The Heritage Strategy should be the starting point for Heritage Statements. It has considered heritage assets throughout the District as 'themes' and produced the 'Themes Assessment' check list, thus providing a clear methodology how heritage assets can be considered. This checklist has been used to inform the site selection process in this Plan and the guiding principles are set out in the four case studies (Discovery Park, Sandwich; North Deal; Farthingloe, Dover; and Fort Burgoyne & Connaught Barracks) in the Heritage Strategy. These follow a simple format:

Box 1

1. Site introduction/the study area - a brief description of the site.
2. Archaeological and Historical Background – a table listing the historical ‘Themes’, the principle assets affected in each theme and type of potential impact.
3. Historic Environment Issues – a list of the issues identified and a brief description of each.
4. Conclusion

1.20 The knowledge base will also be improved over time with the Conservation Area Character Appraisals and Local Lists and the District Council will also be providing additional advice as to how developers should undertake Heritage Statements.

Guidance on Coastal Change Management Areas

1.21 With regard to future planning applications and assessment against the CCMA's it is not proposed to include a policy in this Plan as the NPPF and the accompanying Practice Guide sets out the planning considerations for Coastal Change Management Areas (CCMA).

Box 2

Development proposals falling within the Coastal Change Management Areas, as defined on the Proposals Map, will have to be accompanied by an assessment of the vulnerability of the proposed development to coastal change and whether there is any impact on coastal change.

1.22 Paragraphs 106 to 108 in the NPPF and, in particular, Section 6 of the Practice Guide provide clear guidance as to what is, and what is not, suitable for new development and this will be the initial policy stance of the District. Section 6 is summarised below:

- Development would only be permitted in a CCMA if it requires a coastal location and provides substantial economic and social benefits;
- Essential infrastructure may be permitted in a CCMA provided there are clear plans to manage the impacts of coastal change on it, and it will not have an adverse impact on rates of coastal change;
- MoD installations that require a coastal location can be permitted within a CCMA provided there are clear plans to manage the impacts of coastal change;
- For all other development, within short-term risk areas (i.e. 20 years time horizon) only a limited range of types of development directly linked to the coastal strip such as beach huts, café/tea rooms, car parks and holiday short-let caravans and camping, might be permitted;
- Within medium to long term risk areas (i.e. 50 to 100 years time horizon) a wider range of time-limited development might be permitted such as hotels, shops, offices or leisure activities requiring a coastal location and providing substantial economic and social benefit;
- Permanent new residential development would not be appropriate.

1.23 Development proposals that fall within the Kent Downs Areas of Outstanding Natural Beauty and Heritage Coast would also be restricted by those designations so the above examples may not be acceptable for reasons other than vulnerability to coastal erosion.

Open Space and Play Space Standards Policy

1.24 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 these resources; therefore it is important to plan positively to meet the additional demand by maintaining and enhancing existing facilities or creating new open spaces. 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.

1.25 Open Space Standards have been produced to help evaluate any additional need arising from new development. Expected levels of quantity, quality and accessibility for the various categories of open space are defined within the standards. The standards have been derived using information gained from a number of sources, including recent comprehensive audits of outdoor sports facilities and equipped children's play areas. Projects designed to address any identified deficits and spare capacity will be set out in supporting strategies. The first of these supporting documents, 'Review of Play Area Provision 2012-2026', was adopted in March 2012.

The standards apply to four categories of open space:

- Accessible green space – parks and gardens, amenity open space, green corridors, village greens, informal kick-about areas, informal playable space and closed churchyards;
- Outdoor sports facilities – dedicated sport facilities that are suitable for competitive matches and formal training activity;
- Children's play space – equipped play space, multi-use games areas and skate parks and
- Community gardens and allotments

1.26 The total requirement for these categories of open space is 3.36 hectares per 1,000 residents. Details are provided in Table 3.1. The need for other types of open space, such as operational cemeteries, cannot be expressed as district wide standards, therefore those requirements will be assessed on a development specific basis.

Open Space Type	Quantitative Standard	Accessibility Standard ⁽¹⁾	Quality Standard	Notes
Accessible green space	2.22 ha per 1,000 population	At least one accessible green space of minimum size 0.4ha within 300m At least one green space of 0.2ha	Green Flag guidance at strategic sites. Qualitative improvement priorities at non-strategic sites discussed	Green Flag status is held by one site in the District: the semi-natural space at Samphire Hoe. The long-term aspiration is to gain Green Flags for strategic parks; the

Open Space Type	Quantitative Standard	Accessibility Standard ⁽¹⁾	Quality Standard	Notes
		within 15 minute walking time/1,000m	in the forthcoming refreshed Parks & Open Spaces Strategy	forthcoming refreshed Parks & Open Spaces Strategy will set out action plans to achieve this
Outdoor sports facilities	1.17 ha of natural grass playing pitches per 1,000 population	Three sub-areas within the district have been defined on the basis of league structures	Sport England design and cost guidance, quality standards of relevant National Governing Bodies of sport	Requirements for artificial grass pitches, tennis courts, bowling greens, athletics tracks and netball courts will be detailed in the forthcoming refreshed Playing Pitch and Outdoor Sport Strategy
Children's equipped play space	0.06 ha per 1,000 population	Local play space within 600m and/or strategic play space 1,000m. At least one equipped play space in each settlement of village level or above	Play England Guidance, such as 'Design for Play'. Fields in Trust Guidance, such as 'Planning and Design for Outdoor Sport and Play'	Provision of 'Playable' accessible green space replaces the previous requirement for Local Areas for Play. Requirements for multi-use games areas and skate parks will be detailed in the forthcoming refreshed Playing Pitch and Outdoor Sport Strategy
Community gardens and allotments	0.21 ha per 1,000 population	At least one site within 15 minute walking time or 1,000m	Not applicable	

Table 1.1 Proposed Open Space Standards

1. Accessibility Standards are not applicable to settlements below village level in the Core Strategy settlement hierarchy. It is unlikely that hamlets will be able to sustain support for open space facilities such as equipped play areas, and in any case residents usually have ready access to public rights of way and the wider countryside. In addition, the requirement for a green space at least 2ha in size within 15 minute walking time/1,000m is only applicable to settlements of rural service centre level or above.

1.27 In 'Nature Nearby: Accessible Natural Greenspace' (Natural England, March 2010), four levels of 'naturalness' category are given. Some of the sites discussed are subject to the local open space standards, the rest are designated for nature conservation either as European sites for conservation or Biodiversity Action Plan (BAP) Habitats. The Natural Environment and Rural Communities Act, 2006, put responsibilities on local planning authorities to maintain or enhance biodiversity. While broad targets are established through

the BAP, enhancements deriving from development must be dictated by site-specific conditions and may not be expressed as a quantitative standard unless it incorporates biodiversity targets. Additionally there may be a need to reduce impact on the landscape. For these reasons, no local standards are set for accessible natural green space.

1.28 Operational cemeteries have also been excluded from the standards, even though the Core Strategy recognises that additional cemetery provision will be required to serve the Dover urban area. Operational churchyards exist throughout the District, some of which could be extended. However, new cemetery provision derived through planning means should be suitable for all and acceptable to all religions ⁽⁴¹⁾. Large developments could possibly meet this need on site, but it is not realistic to expect that new facilities be created within walking distance of all urban residents and therefore an accessibility standard is not defined. A statistically significant survey carried out in 2010 ⁽⁴²⁾ indicated that Dover District residents are willing to travel further to access cemeteries than other green infrastructure types.

Policy DM 27

Providing Open Space

Planning applications for residential development of five or more dwellings will be required to contribute sufficient accessible green space (parks, gardens, amenity open space, green corridors, informal kick-about areas and informal playable space ⁽⁴³⁾), outdoor sports facilities, children's equipped play space and community gardens to meet the additional need generated by the development in accordance with the standards that are contained in Table 3.1. Applications will also be required to demonstrate a minimum of 15 years maintenance of facilities. The need arising for other types of open space (operational cemeteries, European site mitigation and landscape mitigation) will be assessed on a development specific basis.

Commercial developments are not required to provide outdoor sports facilities, children's equipped play space, nor community gardens.

Where it is impractical or inappropriate to provide a new area of open space in the form of an on-site contribution, the District Council will consider a commuted payment to make a quantitative or qualitative improvement to an existing publicly accessible open space that is located within reasonable distance of the development. The reasonable distance is guided by the standards set for each type of provision. This commuted sum should be the cost of providing publicly accessible open space and long term maintenance costs.

1.29 Out-of-town commercial developments on allocated sites are covered by site-specific policies that consider issues such as the impact on nearby natural and semi-natural green infrastructure and appropriate provision of green corridors and landscaping. For example Policy LA1 applies to phases II and III of White Cliffs Business Park in Whitfield. It sets out

41 A site assessment study for the Dover Town's new cemetery. Dover District Council, 2010

42 Proposed Standards for Open Space Provision, Dover District Council, 2011

43 Closed churchyards and village greens are listed as categories of accessible green space in paragraph 1.23, but are excluded from this part of the policy because it is not possible to create new sites of these types within developments. However, off-site contributions may be used to increase the capacity of suitably located accessible green space of any type

requirements for improvements to the North Downs way, structural landscaping and buffer zones. Publicly accessible green space was provided as part of Whitfield Business Park phase I, as shown on Map 4.2 in Appendix 4. If unallocated sites come forward for commercial development the need for green infrastructure will be assessed on a site-specific basis.

1.30 Commercial developments within settlement confines may be capable of providing green infrastructure or public realm facilities to support increased footfall caused by the scheme. For example, permission was recently granted to a mixed used development in Dover town centre that includes a landscaped pocket park and pleached trees to enhance an existing thoroughfare. If on-site provision is not possible, off-site contributions to local initiatives for public realm improvements may be appropriate. The recent establishment of the Dover Town Team is one such initiative that off-site contributions could be sought to support.

1.31 Historically Dover District Council has secured off-site contributions via S106 agreements, and this will continue at least until a locally determined Community Infrastructure Levy (CIL) is introduced. The Council is preparing to introduce CIL to the District, and may choose to secure funding for open space provision via that route in the future. In the meantime, the 2010 CIL regulations have introduced restrictions to the way in which S106 agreements may be used. Planning obligations (such as off-site contributions) may only be secured if they are:

- (a) necessary to make the development acceptable in planning terms;
- (b) directly related to the development; and
- (c) fairly and reasonably related in scale and kind to the development.

1.32 In addition, off-site contributions may only service the additional need that arises from the new development; they cannot be used to put right existing deficiencies.

1.33 The standards will be applied to determine whether existing provision within the relevant accessibility standard and/or effective catchment has sufficient capacity to accommodate the additional demand. In most instances, the population arising from proposed developments will be estimated using occupancy rates given in the KCC paper 'Demographic Forecasts Dover District Council, April 2010' or a subsequent document. For large applications, more detailed population modelling may be necessary to obtain predicted age structures, so that the Sport England playing pitch calculator may be utilised. Allocation of any off-site monetary contributions to projects will be guided by the accessibility standards, to ensure the facilities provided are directly related to the development. The detailed arrangements for any on- or off-site provision will depend on the particular local conditions and issues, which may vary from site to site. In some cases improved access arrangements to an existing facility may be an appropriate use of off-site contributions. Due to the terrain of Dover urban area topographical factors must often be taken into account when considering accessibility; the distance to the nearest open space facility would be measured along footpaths.

1.34 This policy will support the implementation of two open space related policies in the Dover District Core Strategy (adopted 2010). Policy DM25 protects existing open space, while CP7 protects the wider Green Infrastructure Network. The standards will help to protect and enhance the publicly accessible open space component of existing green infrastructure by ensuring that proper consideration is given to needs arising from development. Provision of appropriate open space facilities has a valuable role in protecting the wider Green

Infrastructure Network by significantly deflecting recreational pressures away from protected natural and semi-natural elements. Application of the standards will also provide a clearly defined approach for determining whether public open space provision is deficient in the vicinity of a proposed development on protected open space.

Schedule of Policies

1.35 The table below lists, by policy issue, which of the saved Local Plan Policies are to be replaced by policies in the Land Allocations Local Plan.

Policy Issue	Land Allocations Local Plan Policy	Saved Dover District Local Plan Policy (2002) replaced
Development of White Cliffs Business Park, Dover	LA1	LE3
Children's Play Space provision in developments of 15 or more dwellings	DM27	OS2
Provision of open space needs from new development	DM27	OS3
Eastry Hospital	LA22	AS11

Table 1.2

1.36 The following table lists the saved Local Plan Policies (2002) that are to be deleted and not replaced.

Policy Issue	Saved Dover District Local Plan (2002) Policy to be deleted	Explanation for deletion
Industrial and business land allocations	LE2	DM2 in the Core Strategy has replaced this policy. Individual allocations are identified in the Site Allocations Local Plan.
Minter's Yard, Deal	LE4	The site has planning permission and is under construction.
Marlborough Road, Deal	LE6	The Retail and Employment Update has indicated that this allocation is no longer required.
Expansion at Pfizer	LE9	The policy was specific to Pfizer. The company has now sold the site and the site is now an Enterprise Zone and subject to a LDO.

Policy Issue	Saved Dover District Local Plan (2002) Policy to be deleted	Explanation for deletion
Development of Tilmanstone Spoil Tip	LE10	The Retail and Employment Update has indicated that this allocation is no longer required.
Safeguarding primary and secondary retail frontages in towns	LE12	Policy DM22 in the Core Strategy provides safeguarding for retail frontages. LE12 is not necessary.
Relocation of Dover Car Park	LE24	The land is being used as a car park under permitted development rights. Policy is no longer required.
Dover Castle Officer's Mess	LE25	Site specific policy not considered necessary as this site could come forward under Development Management policies.
Land allocated for housing	HS2	The sites identified in this policy have either been developed or saved.
Land south of Northwall Road Deal	HS6	Site is within Flood Risk Zone 3 and within the Rapid Inundation Zone (RIZ). Part of the site has been developed.
New convenience provision at Dover	SP3	This policy is no longer necessary as the issues are covered in the NPPF.
New comparison at West Street, Deal	SP8	The site has been developed for other uses.
Betteshanger Spoil Tip	AS2	This has been completed (Fowlmead Country Park).
Royal Marines School of Music, North Barracks, Deal	AS3	The site is under construction.
Army Careers' Information Office, Townwall Street	AS5	The site allocation does not conform to the town centre sequential test as set out in the NPPF.
Old Park Barraks, Dover	AS8	Site has extant planning permission
Church Farm, East Langdon	AS10	Site has been developed.
Boyes Lane Goodnestone	AS12	Site has been developed

Policy Issue	Saved Dover District Local Plan (2002) Policy to be deleted	Explanation for deletion
Ramsgate Road, Sandwich	AS14	Sites have planning permission and/or have been developed. Minerals and Waste Policies apply.
Sandwich Industrial Estate	AS15	Application has been implemented
Snowdown Colliery Pithead and Sidings	AS16	Site is not viable
Snowdown Colliery Spoil Tip	AS17	Site is not viable

Table 1.3

Appendix 1 Town Centre Boundaries



Figure 1.1 Proposed Extension to Dover Town Centre Area
1167

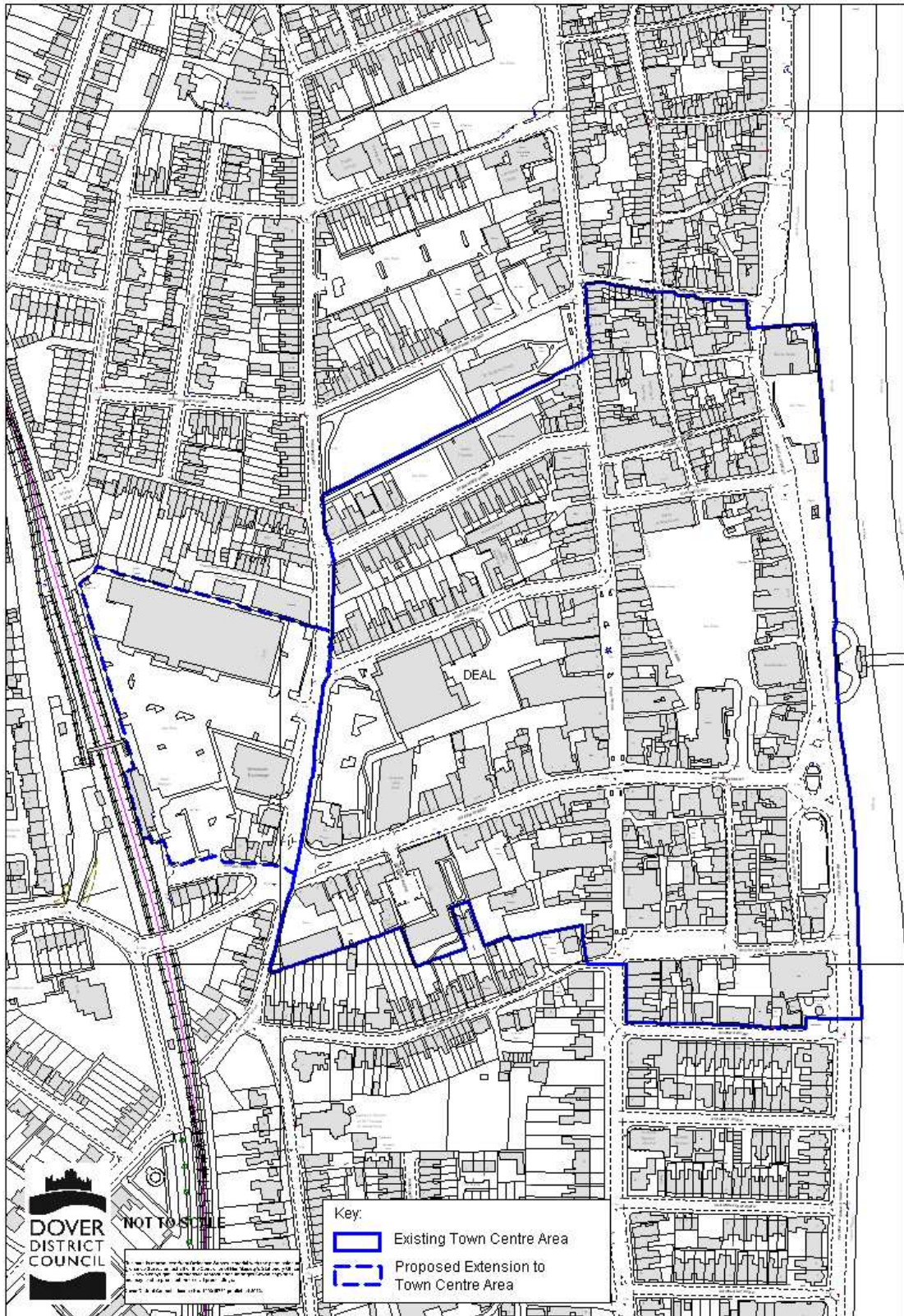


Figure 1.2 Proposed Extension to Deal Town Centre Area

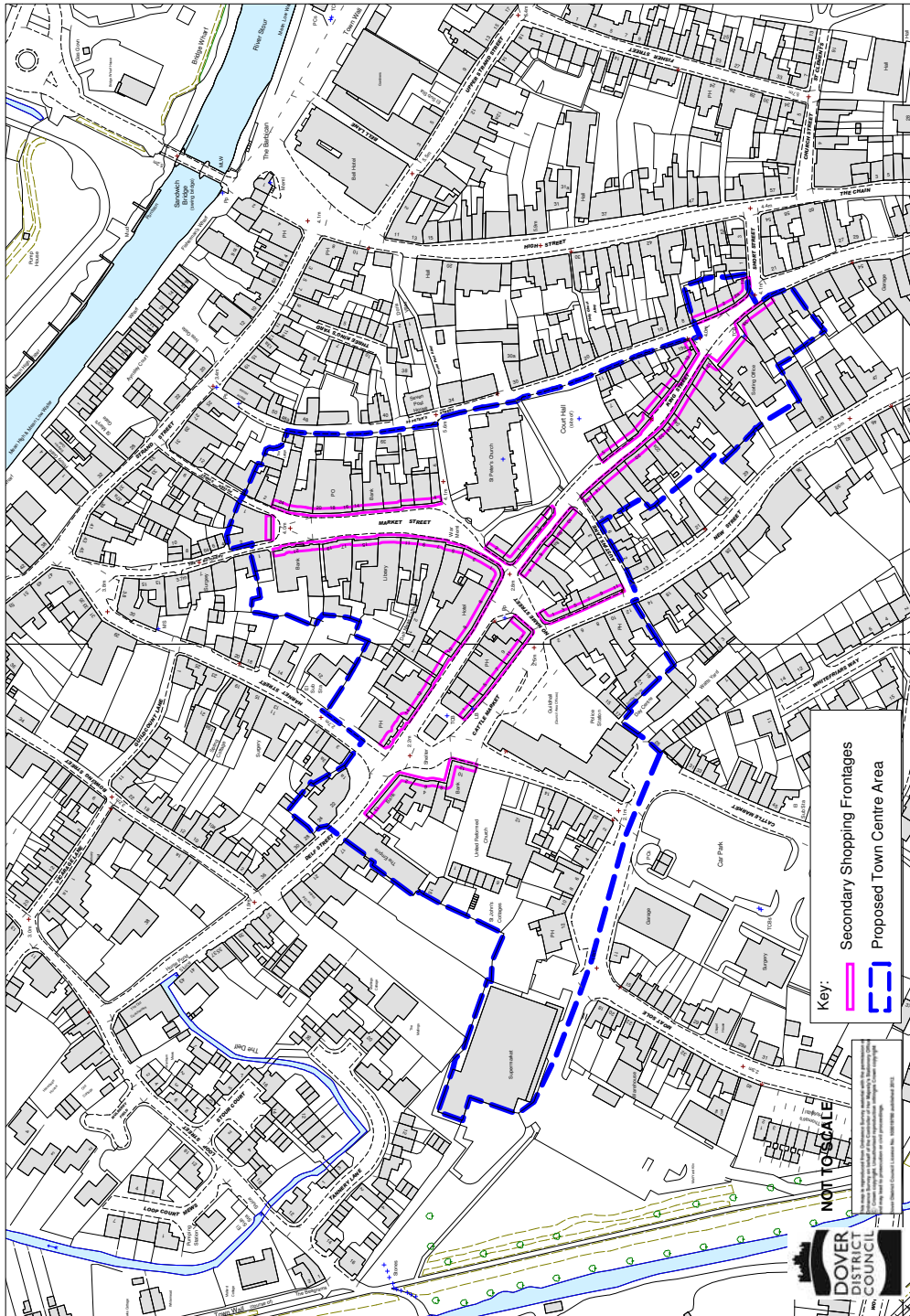


Figure 1.3 Sandwich Proposed Town Centre Area

Appendix 2 Coastal Change Management Areas (CCMA)



Figure 2.1 Oldstairs Bay

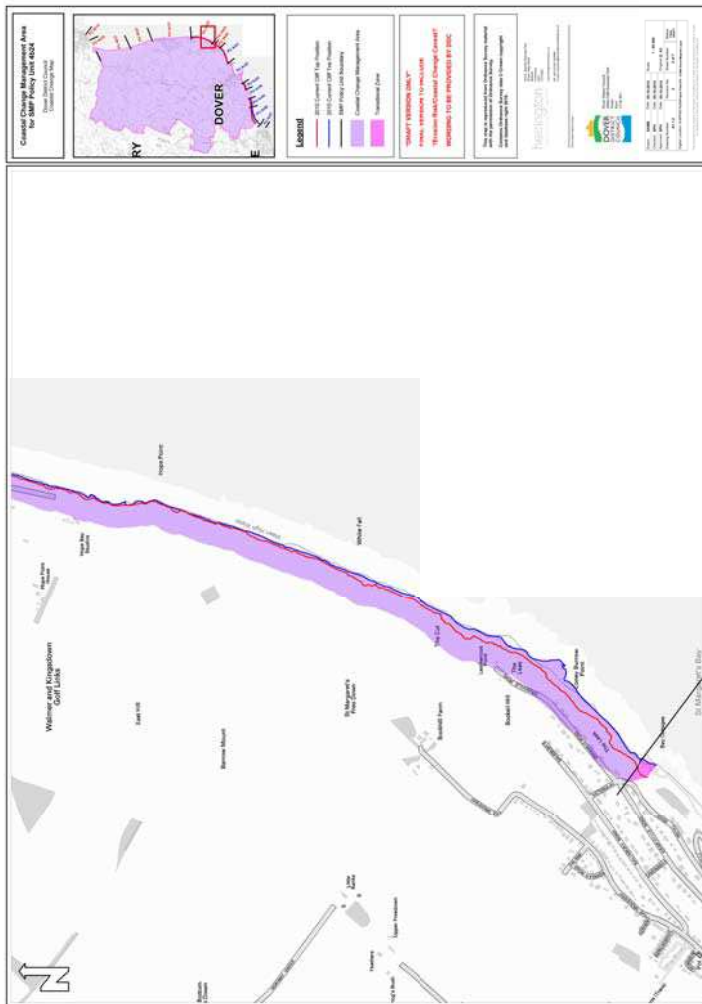


Figure 2.2 Hope Point to St Margaret's Bay

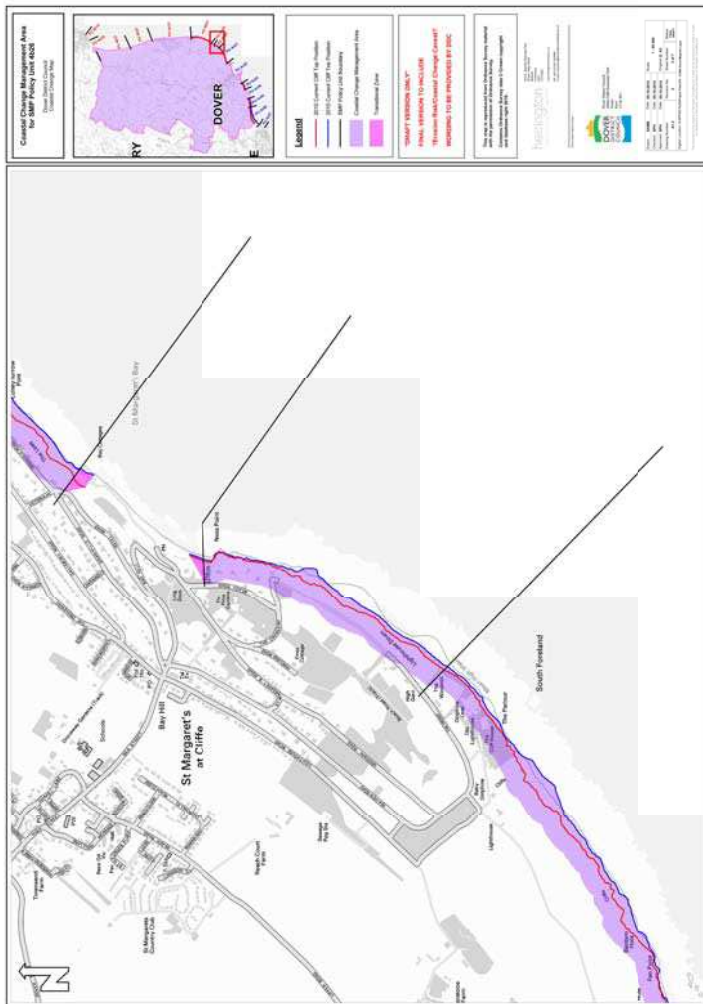


Figure 2.3 South Foreland



Figure 2.4 South Foreland to Dover



Figure 2.5 Shakespeare Cliff

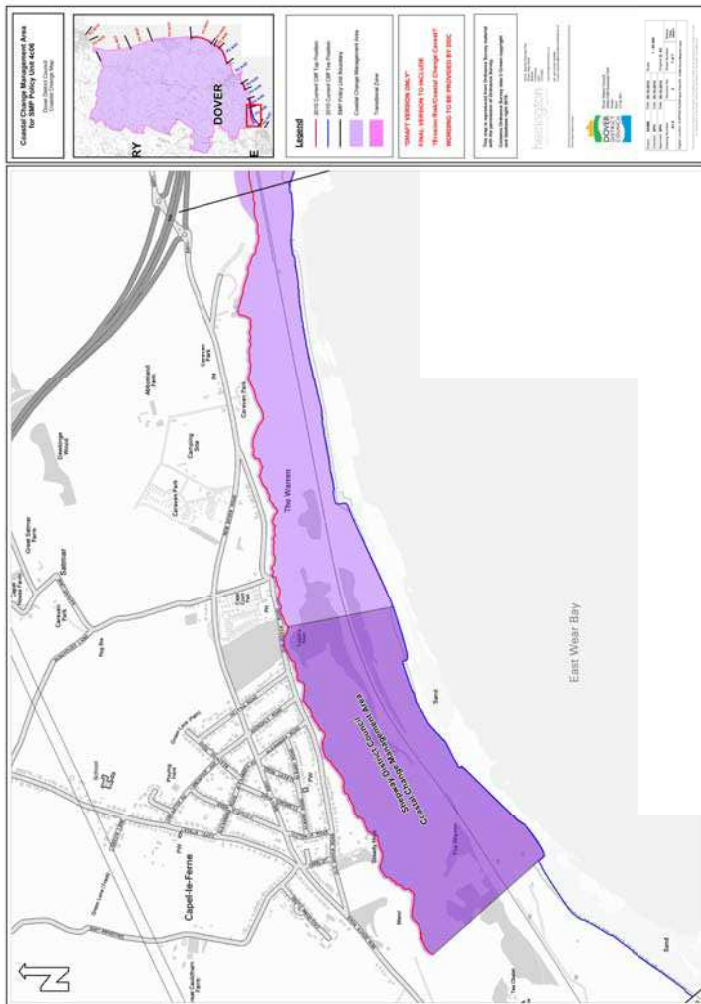
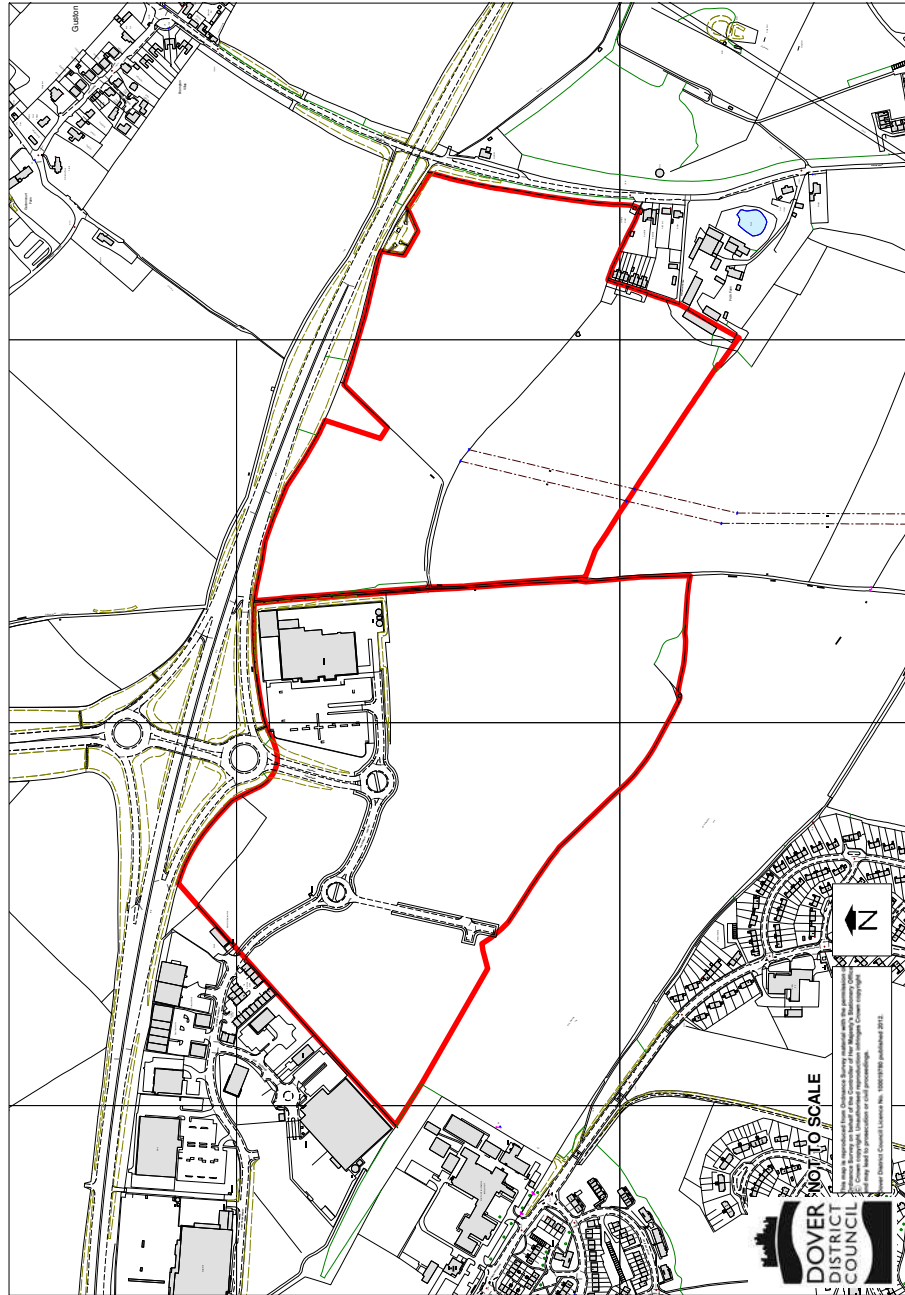


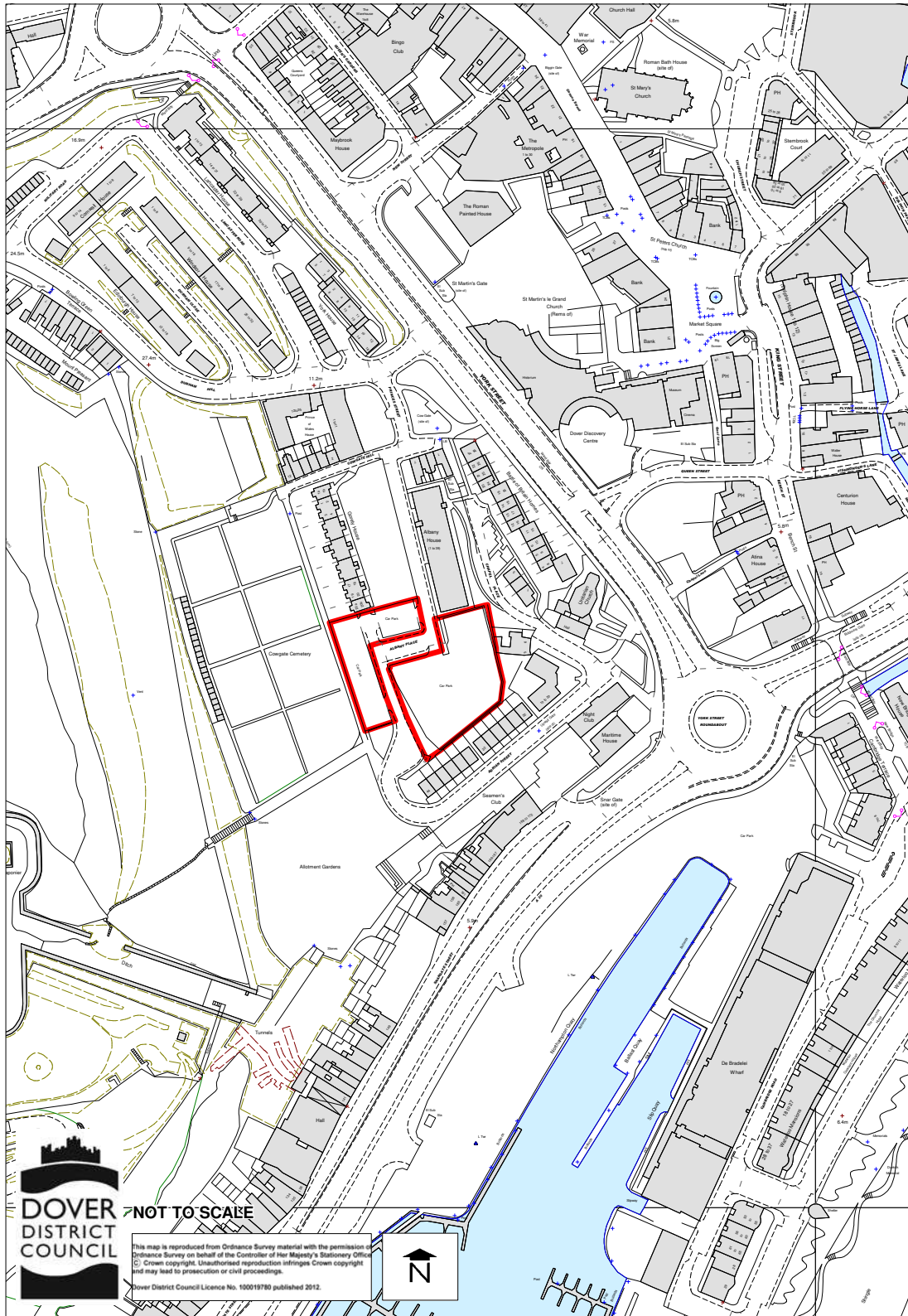
Figure 2.7 Folkestone Warren

Appendix 3 Land Allocation Plans

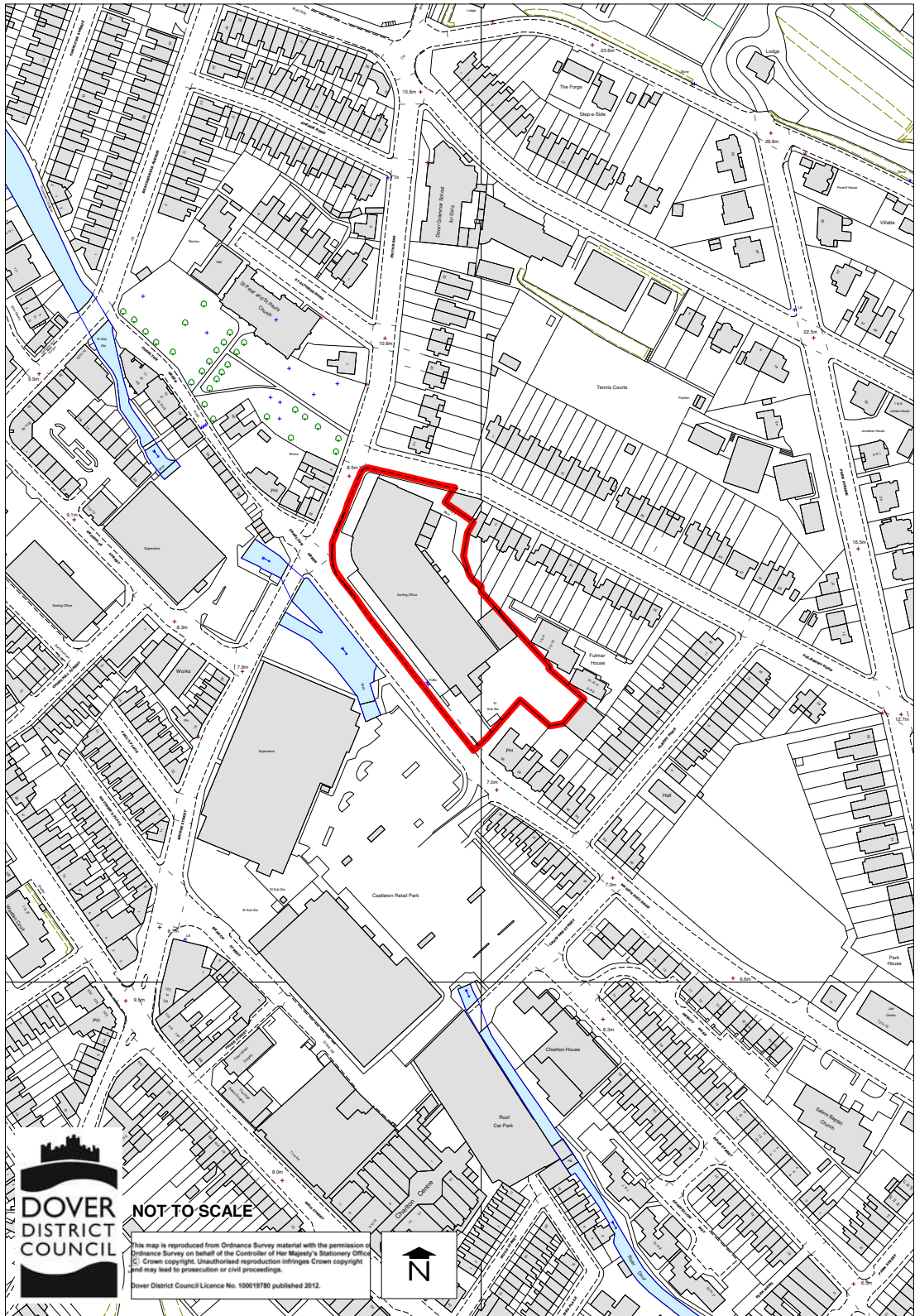
3.1 Dover



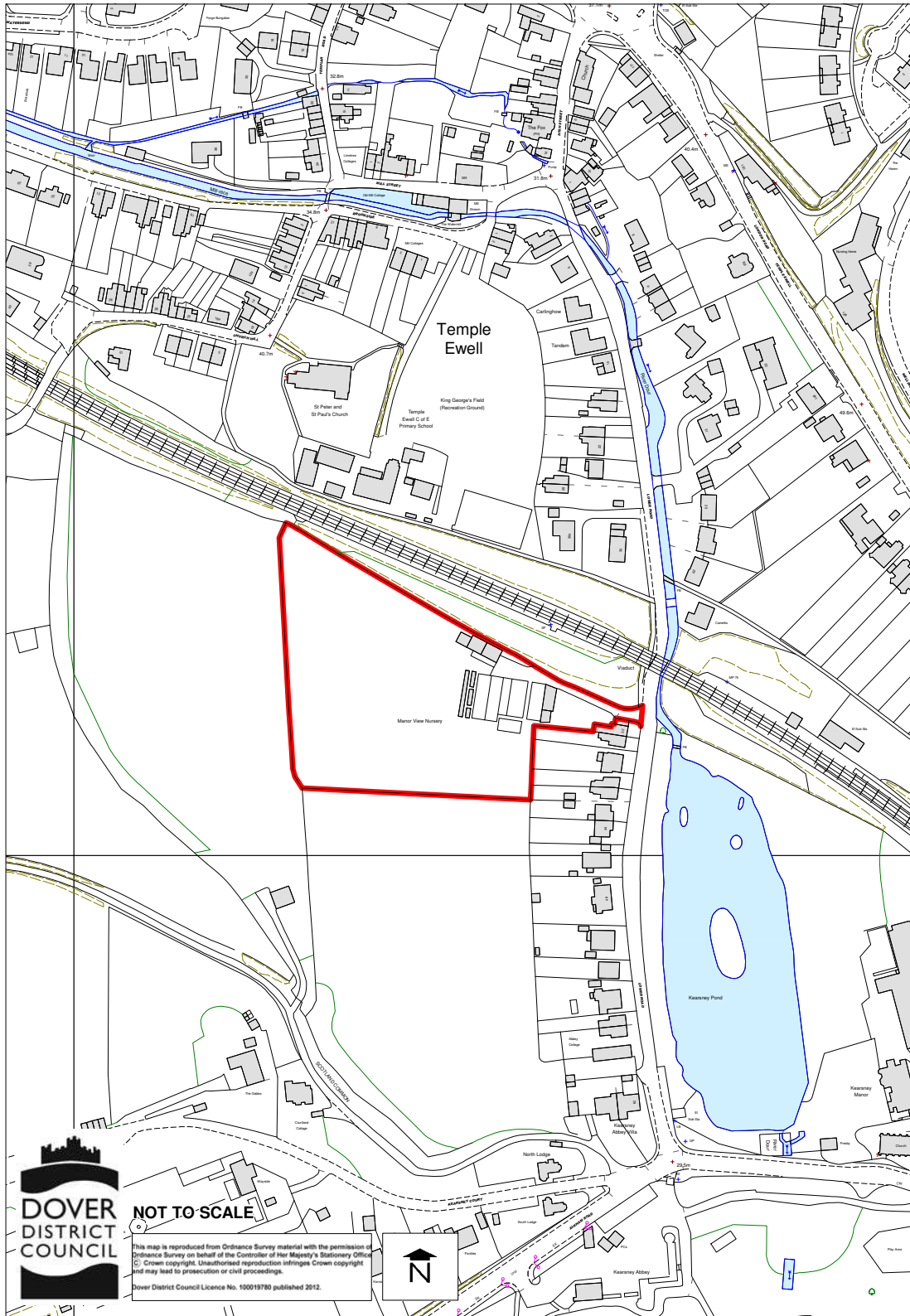
Map 3.1 Policy LA1 - Phases II and III, White Cliffs Business Park, Dover



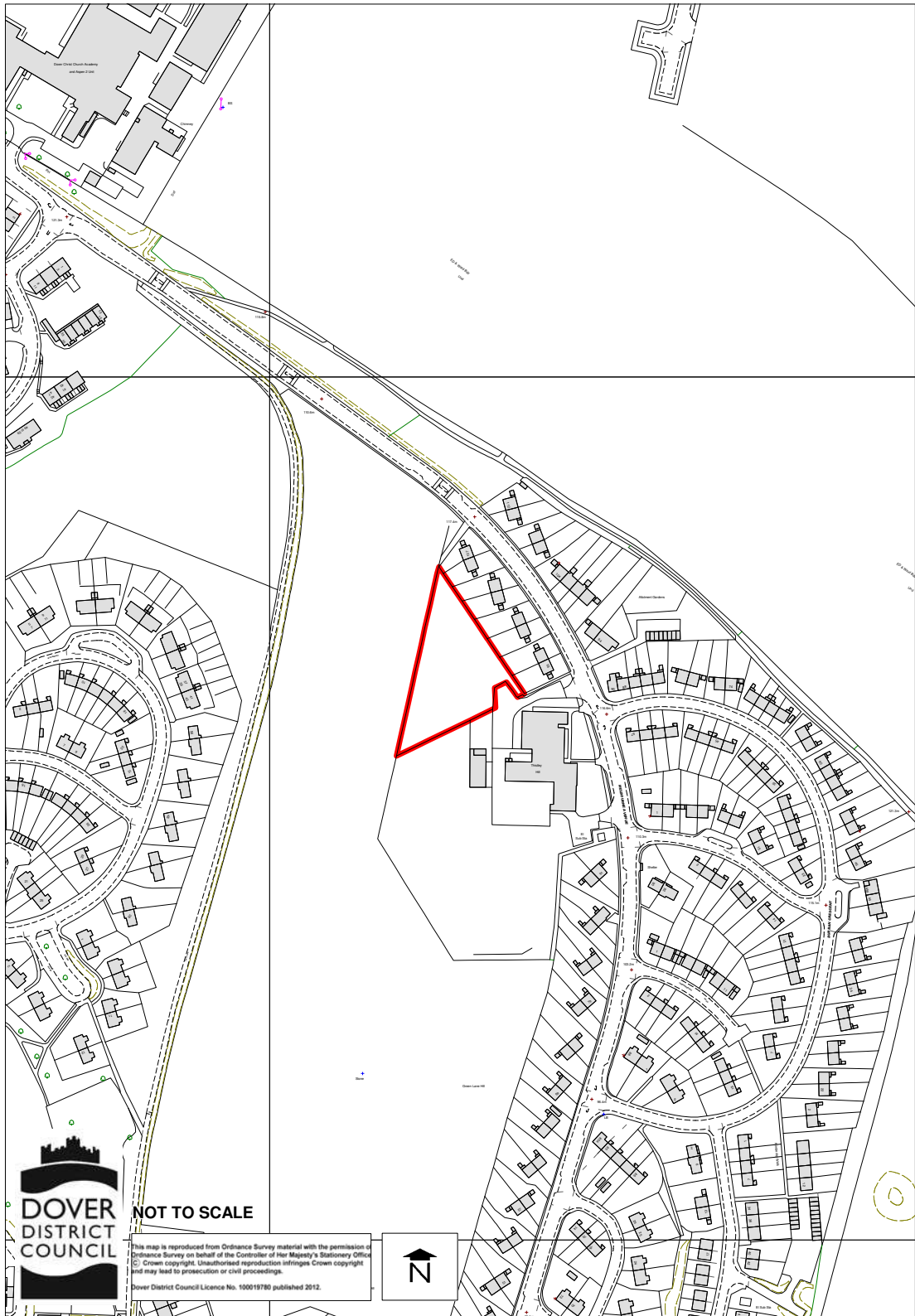
Map 3.2 Albany Place Car Park, Dover



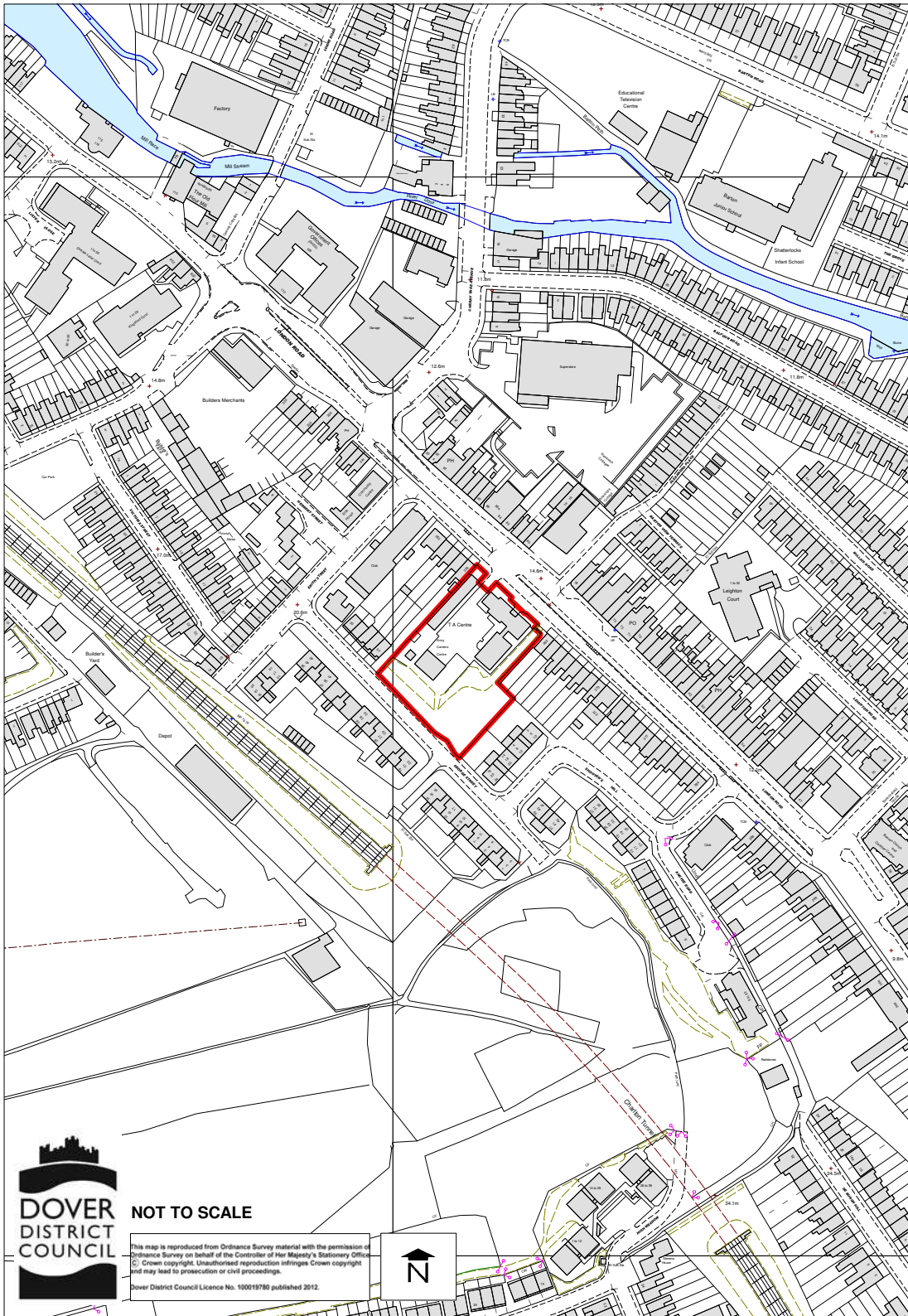
Map 3.3 Charlton Sorting Office, Charlton Green, Dover



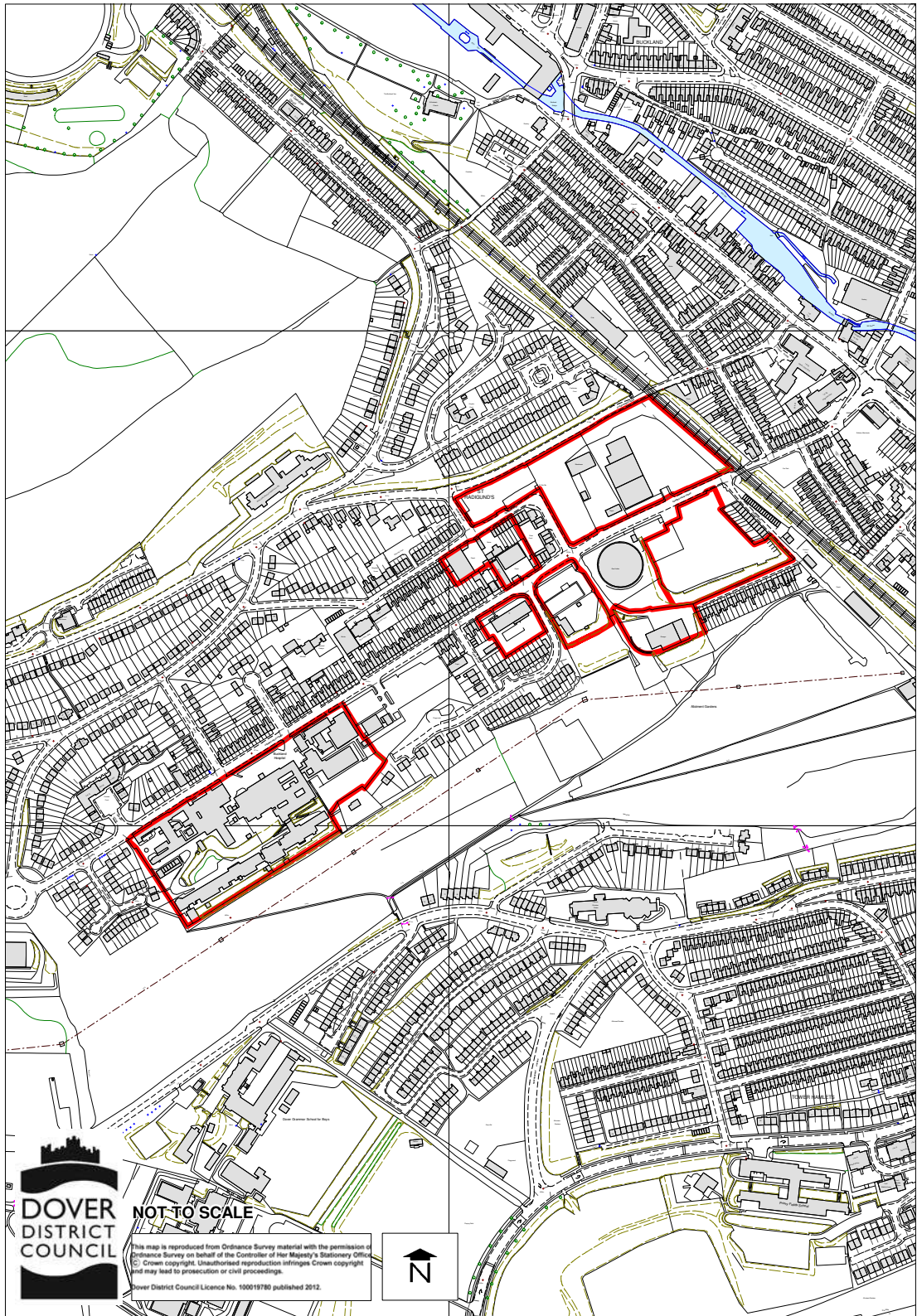
Map 3.4 Manor View Nursery, Lower Road, Temple Ewell



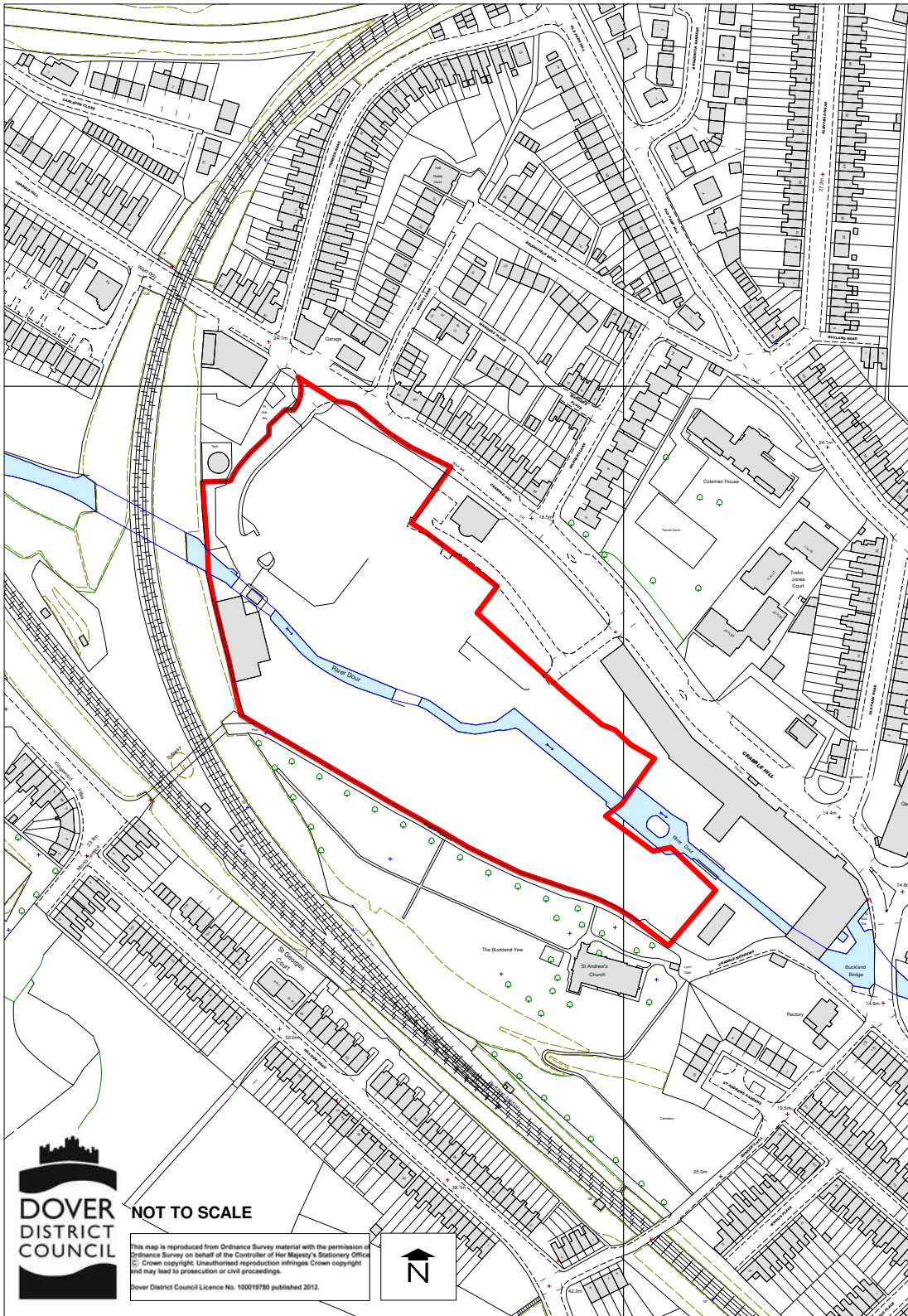
Map 3.5 Adjacent to the Former Melbourne Country Primary School, Dover



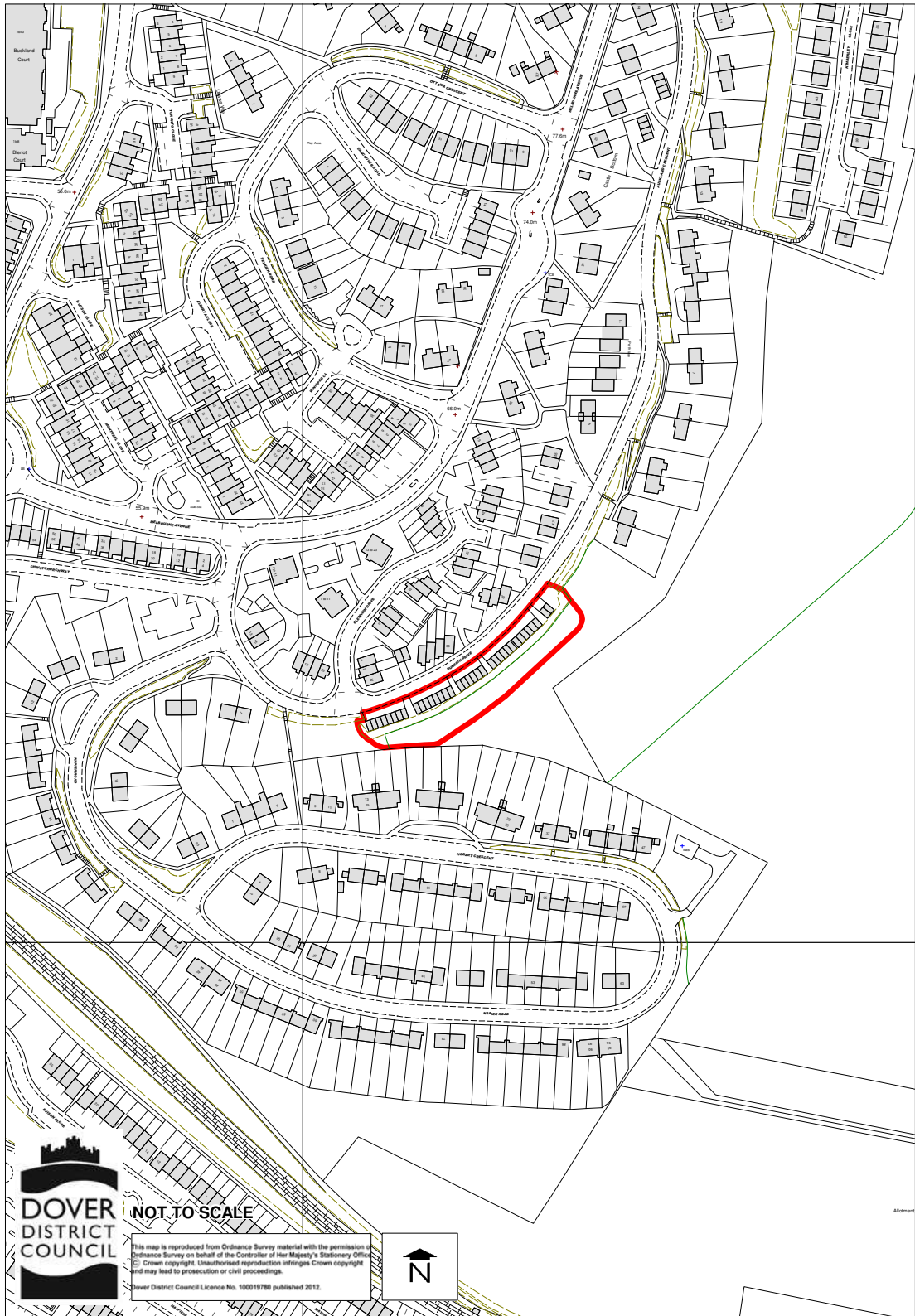
Map 3.6 Former T A Centre, London Road, Dover



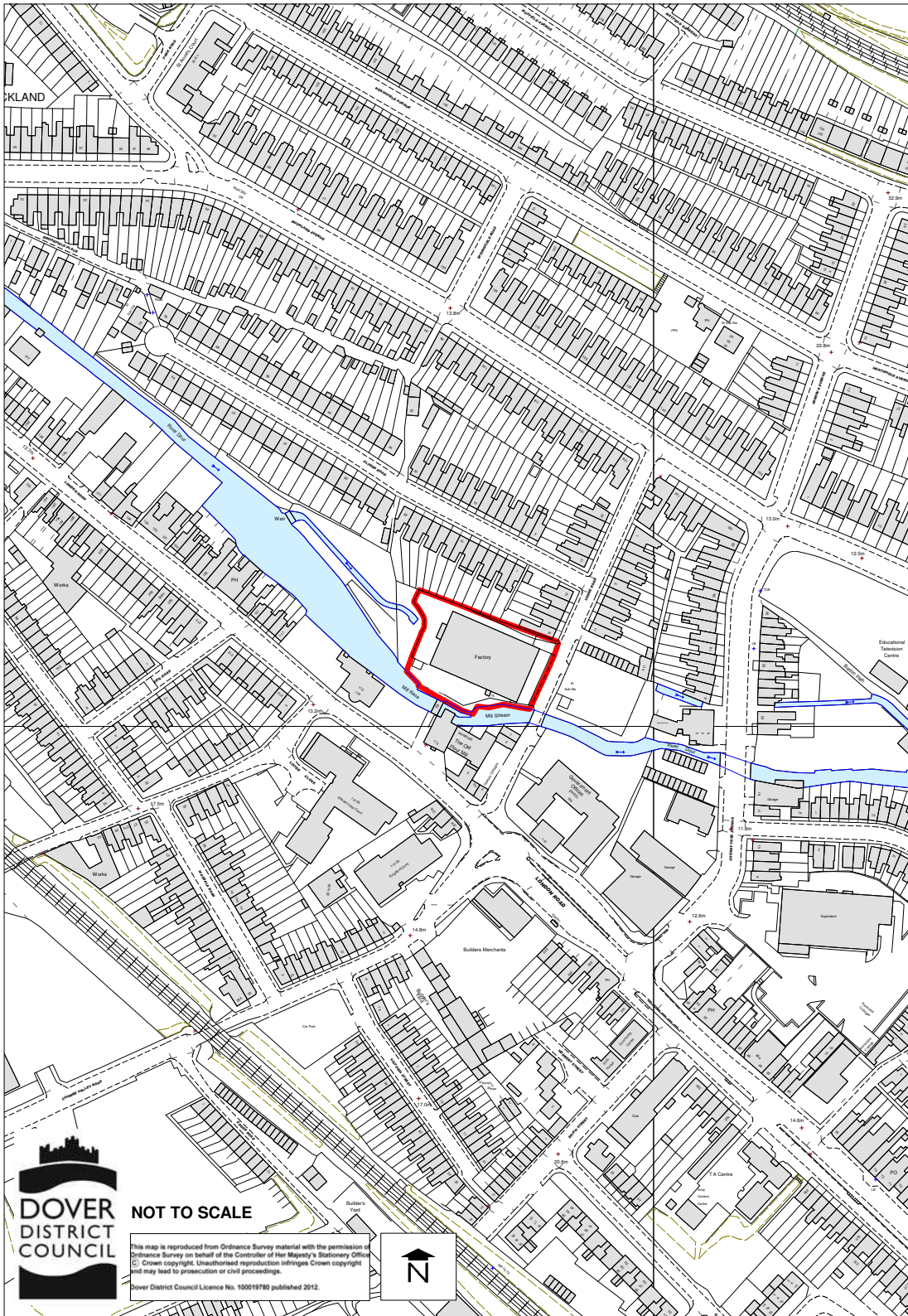
Map 3.7 Coombe Valley Area, Dover



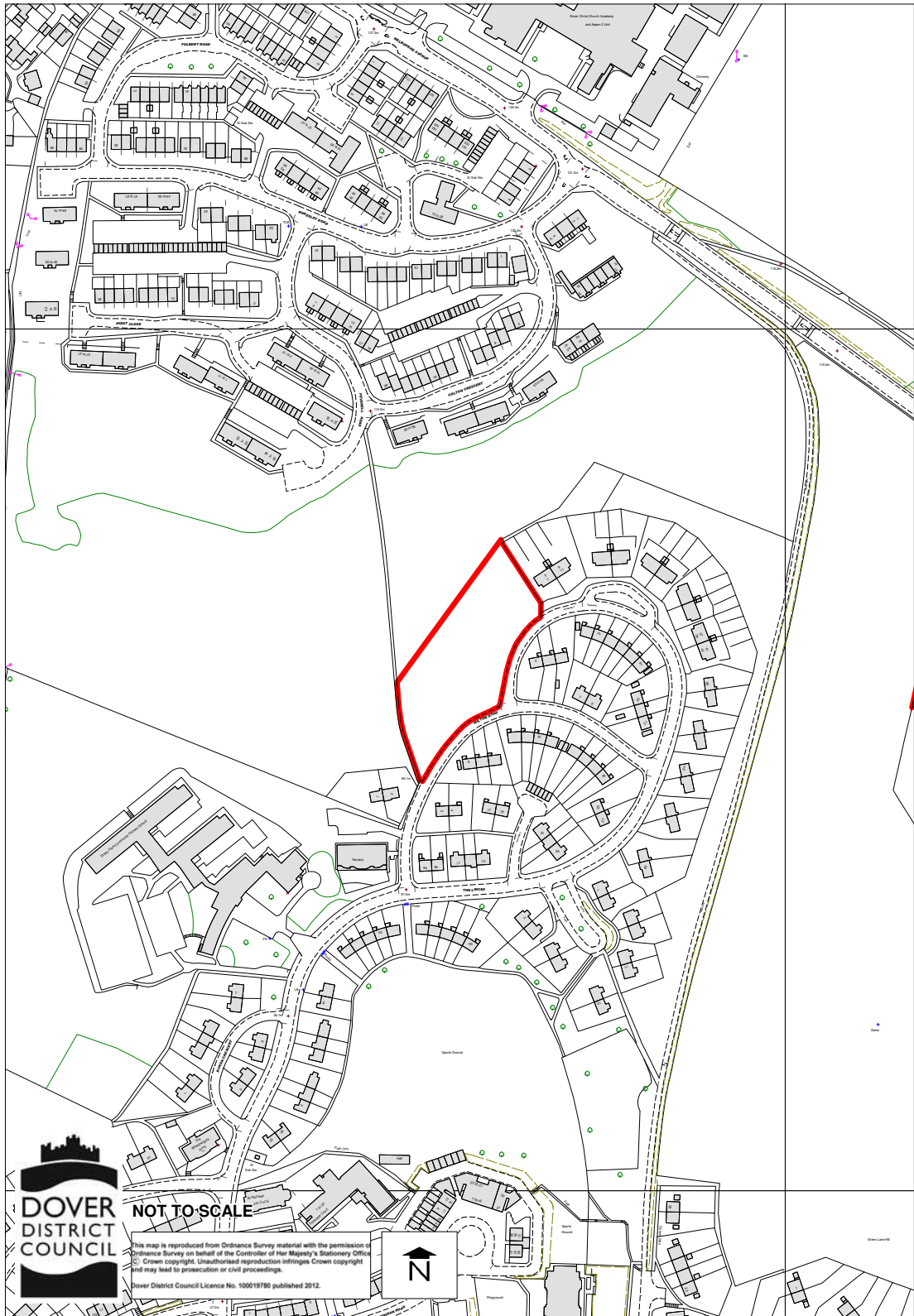
Map 3.8 Buckland Mill, Dover



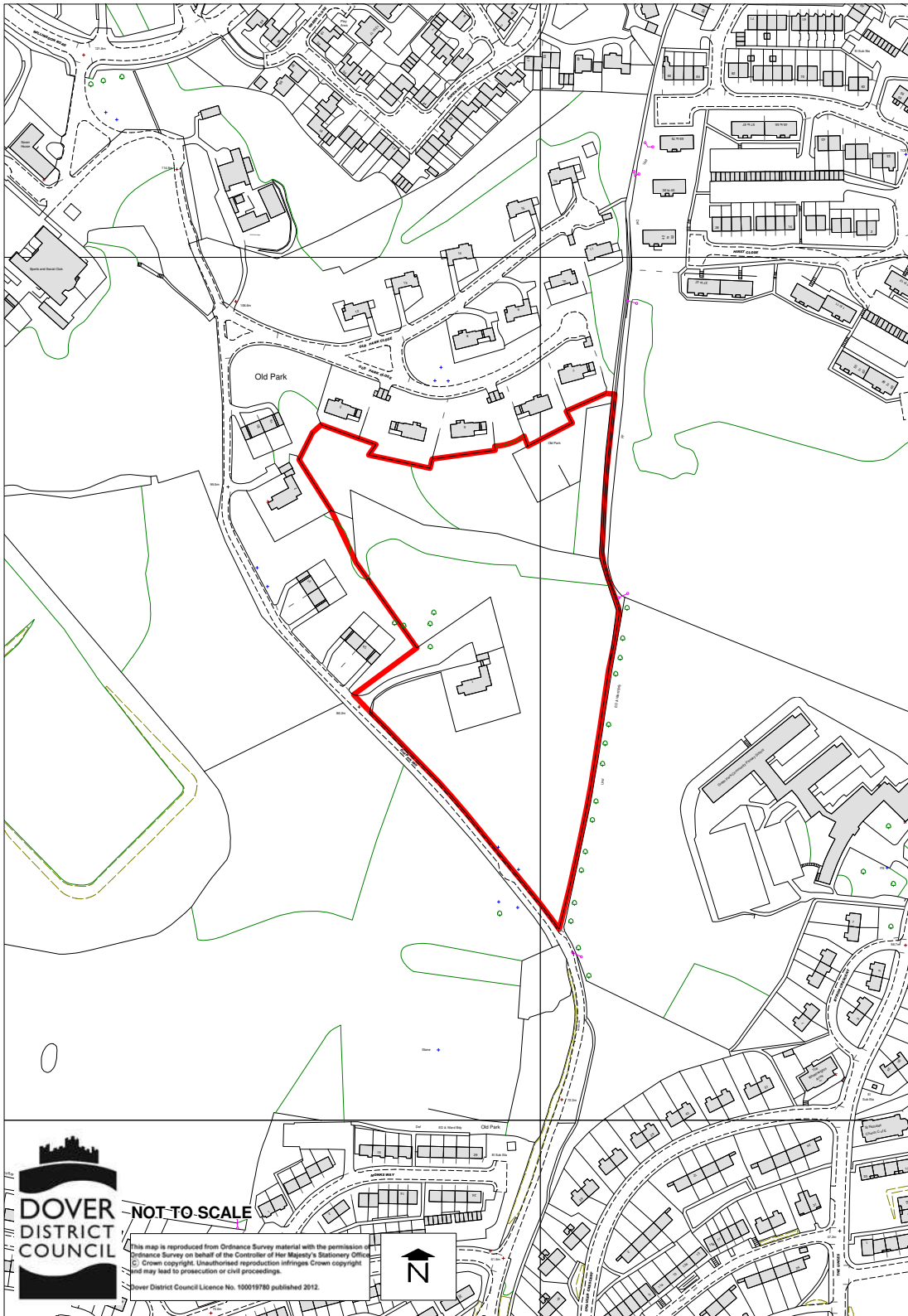
Map 3.9 Land off Dunedin Drive, Whitfield, Dover



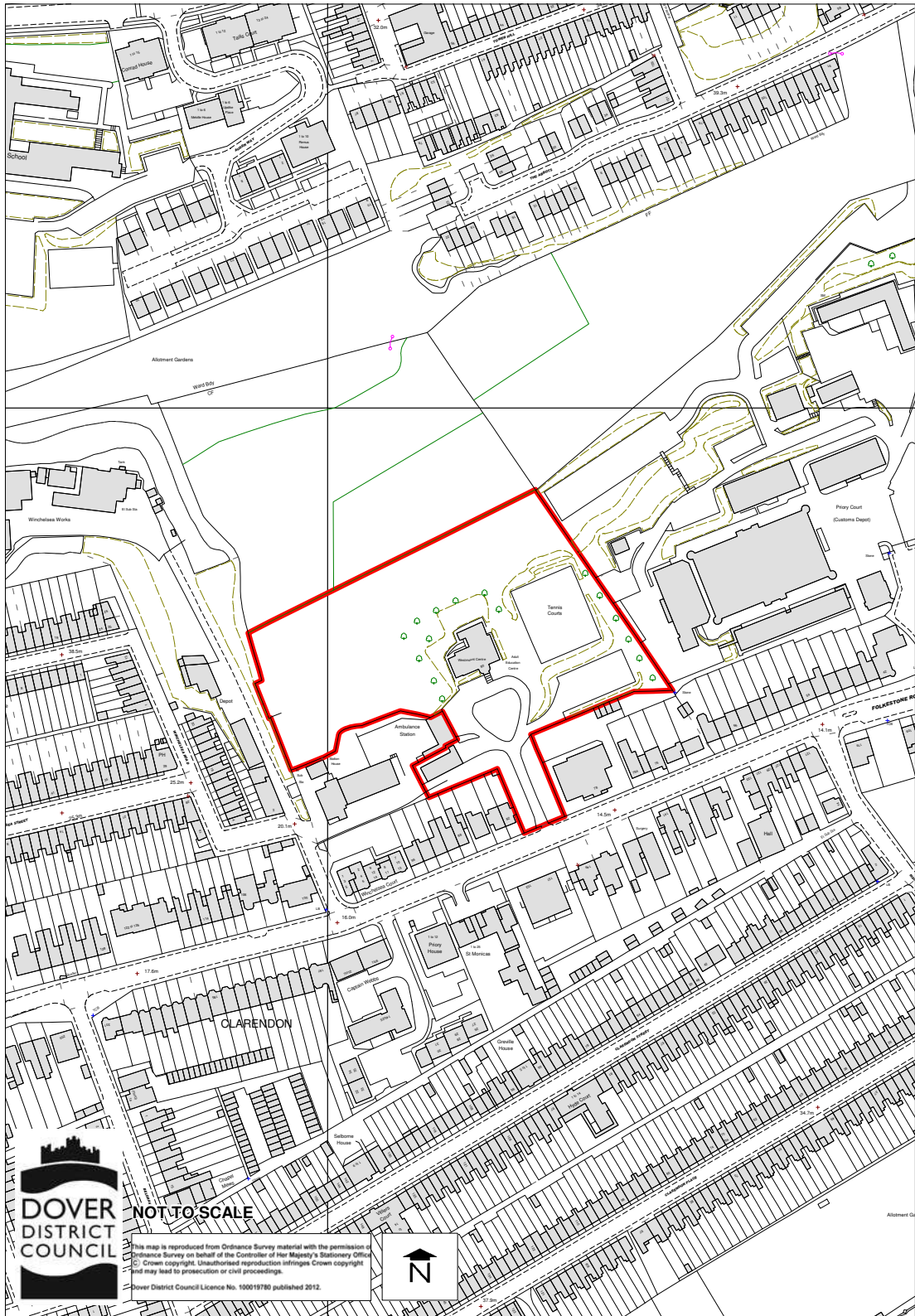
Map 3.10 Factory Building, Lorne Road, Dover



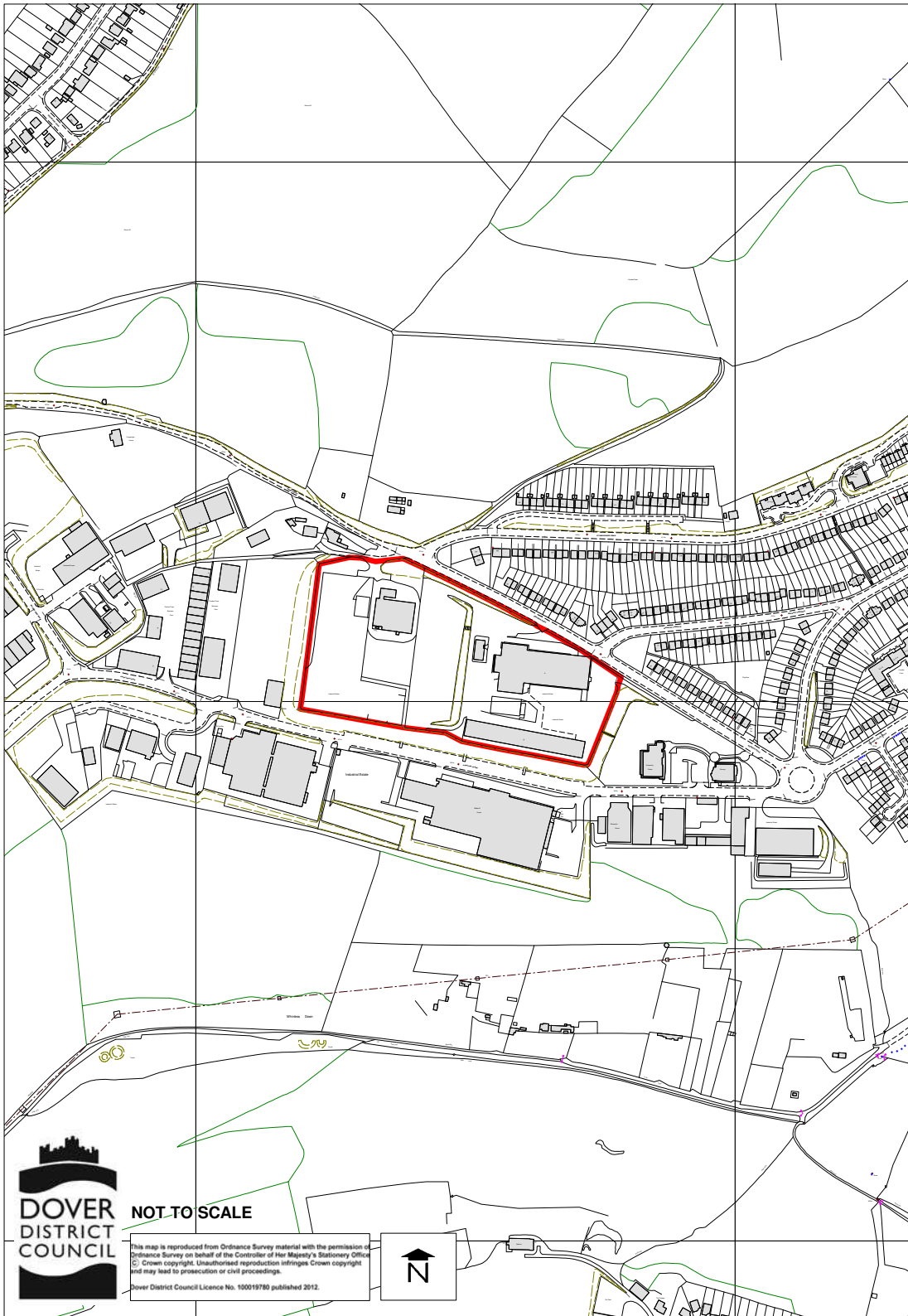
Map 3.11 Land off Wycherley Crescent, Dover



Map 3.12 Old Park, Old Park Hill, Dover

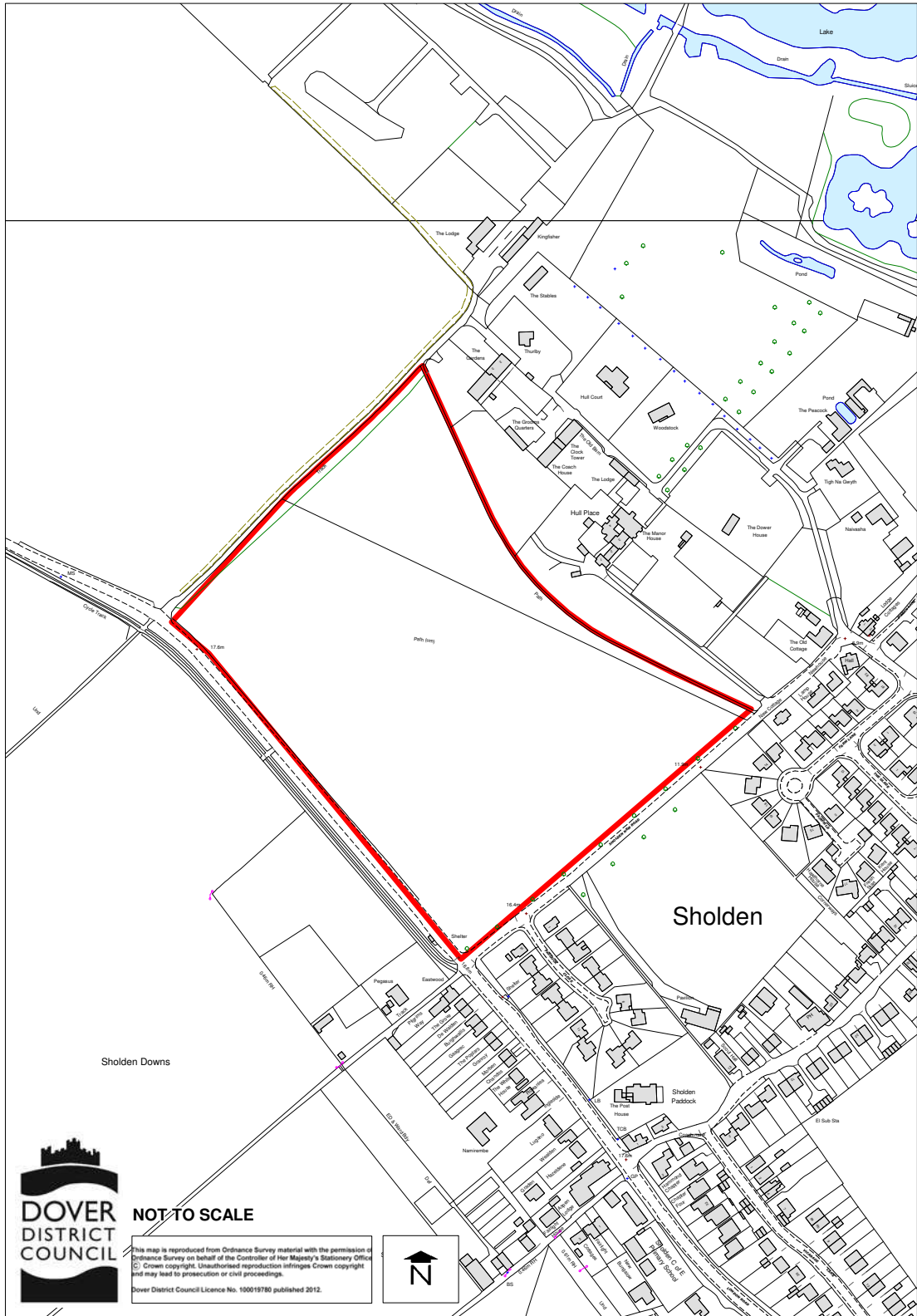


Map 3.13 Westmount College, Folkestone Road, Dover

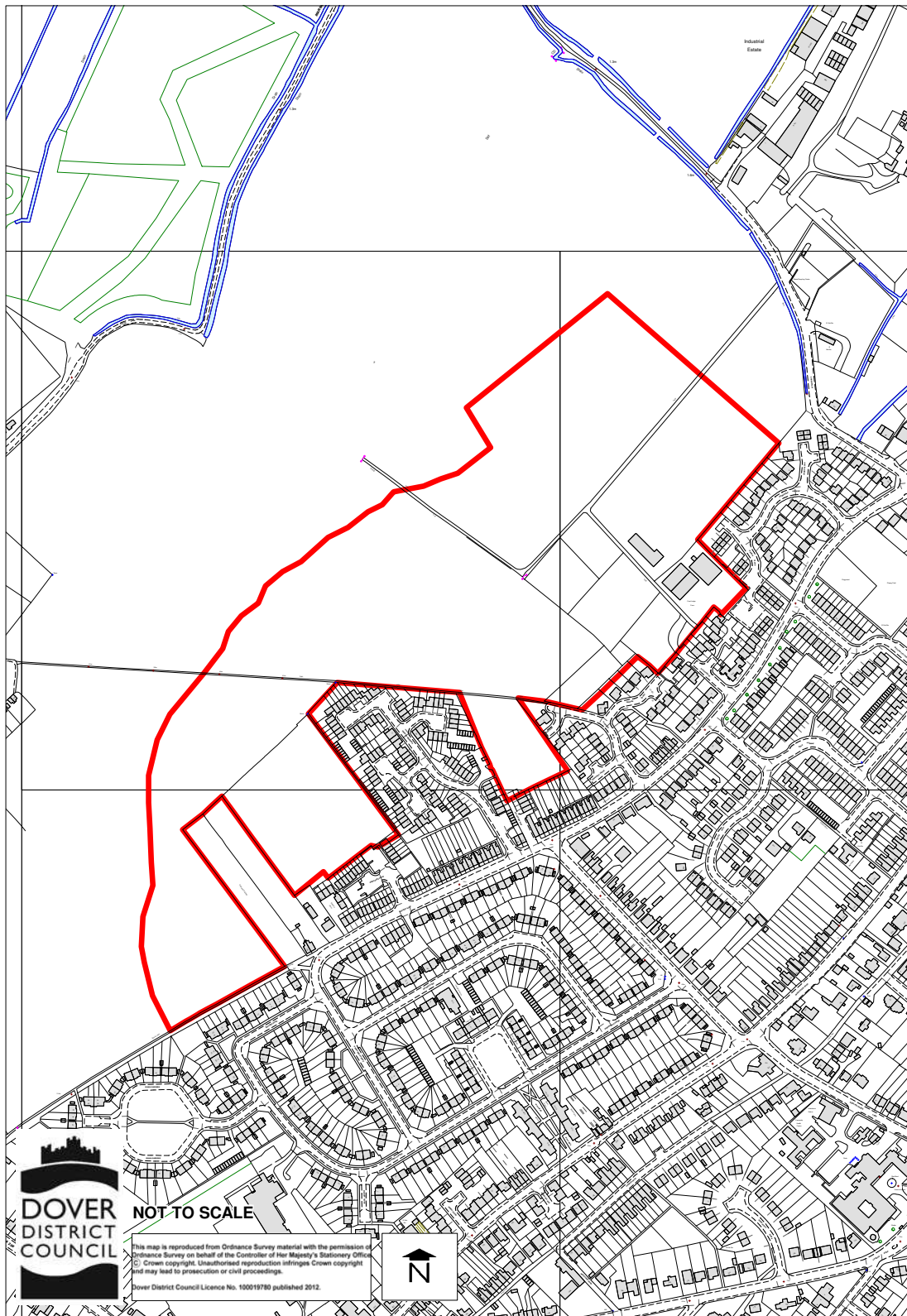


Map 3.14 Barwick Road, Coombe Valley, Dover

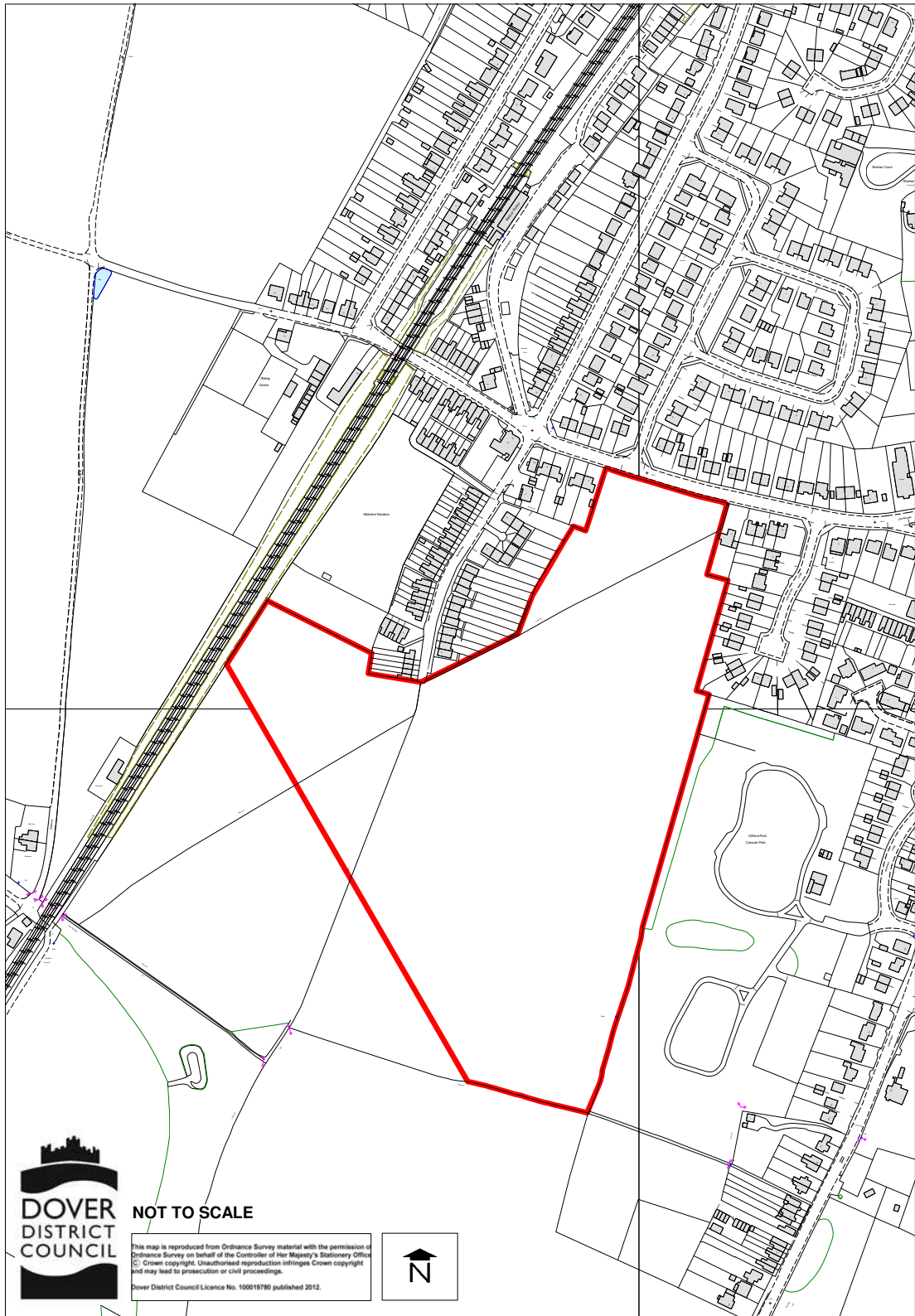
3.2 Deal



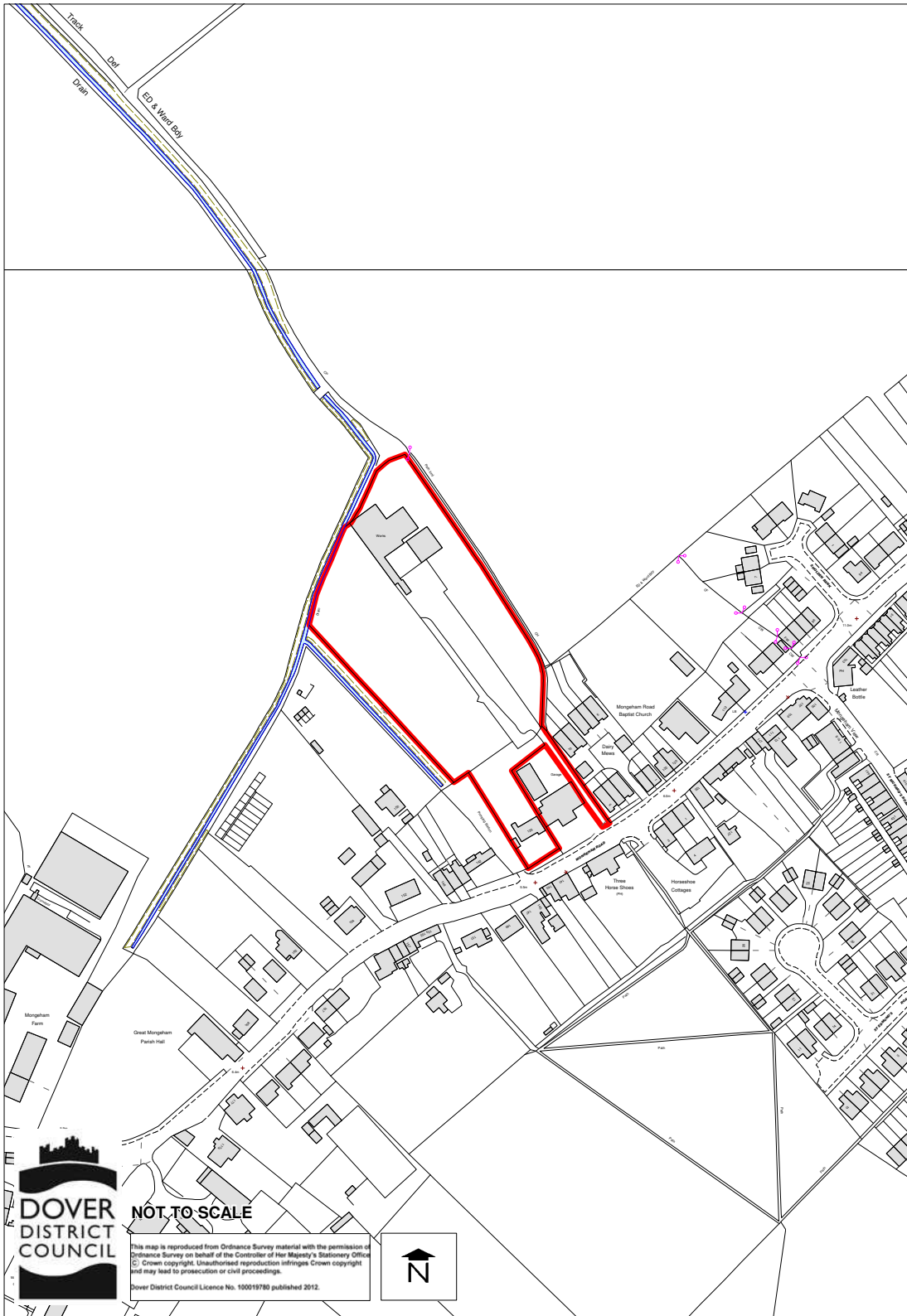
Map 3.15 Land to the north west of Sholden New Road, Sholden



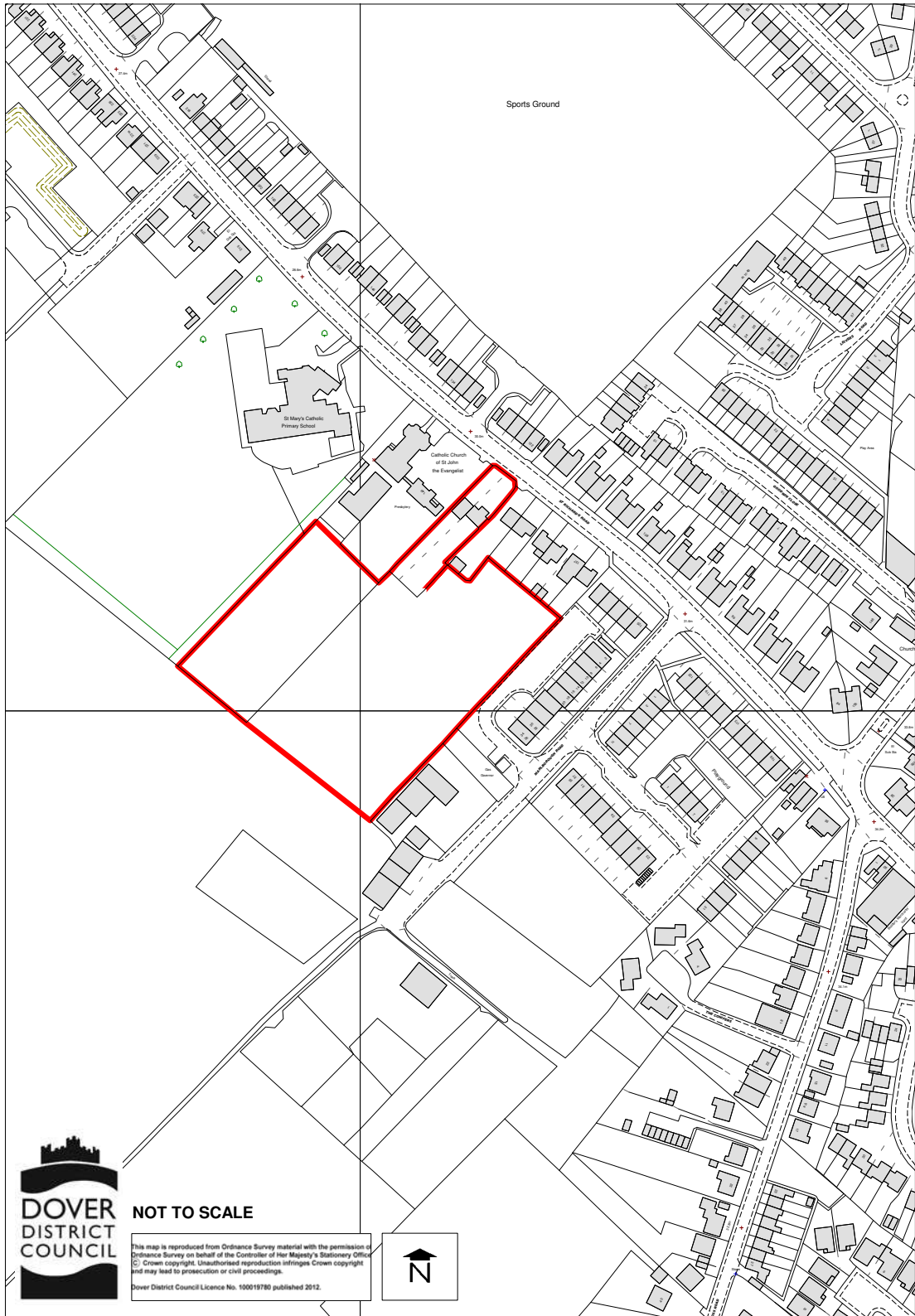
Map 3.16 Land to the North of Middle Deal



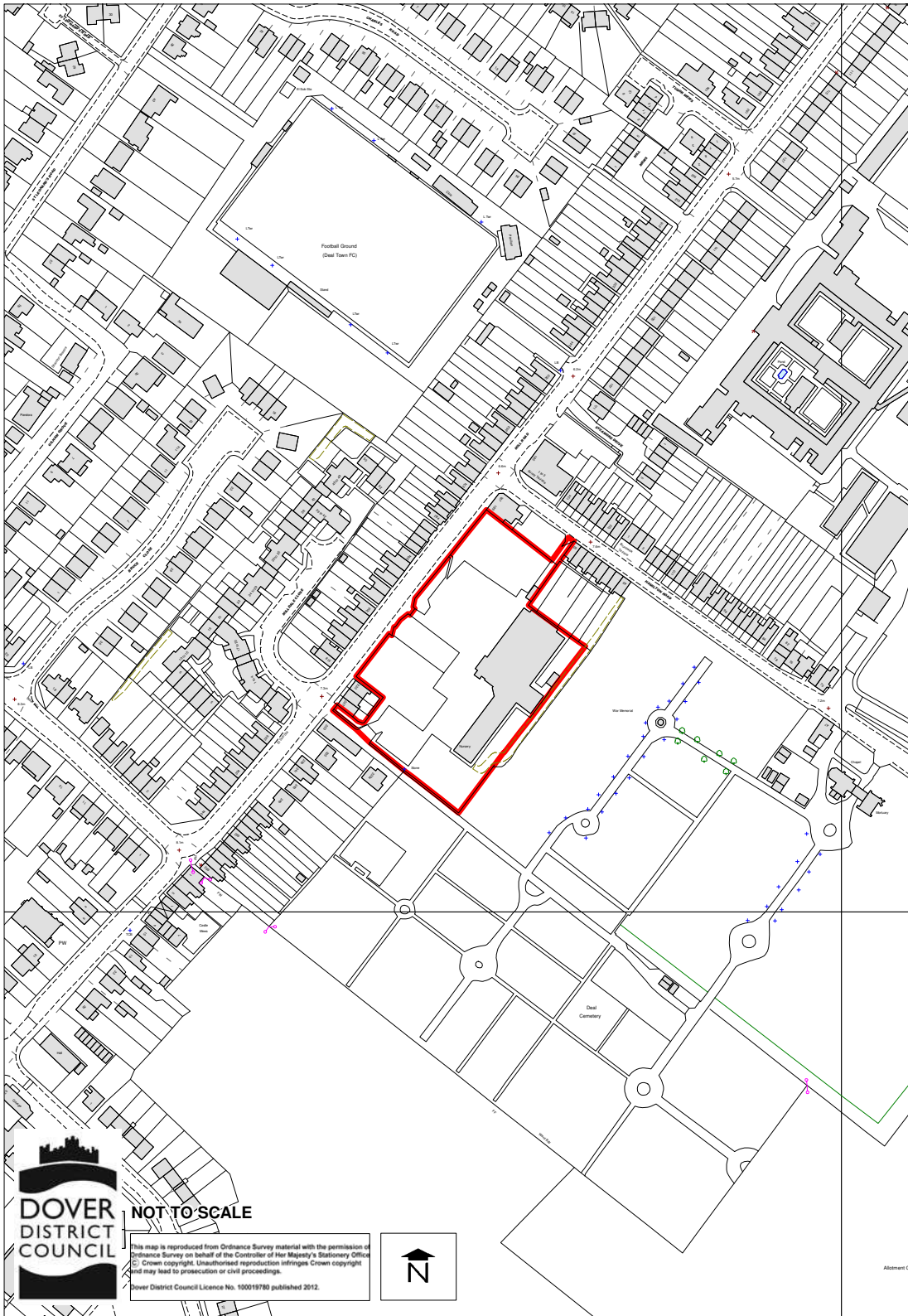
Map 3.17 Land between 51 & 77 Station Road, Walmer



Map 3.18 Stalco Engineering, Mongeham Road, Deal

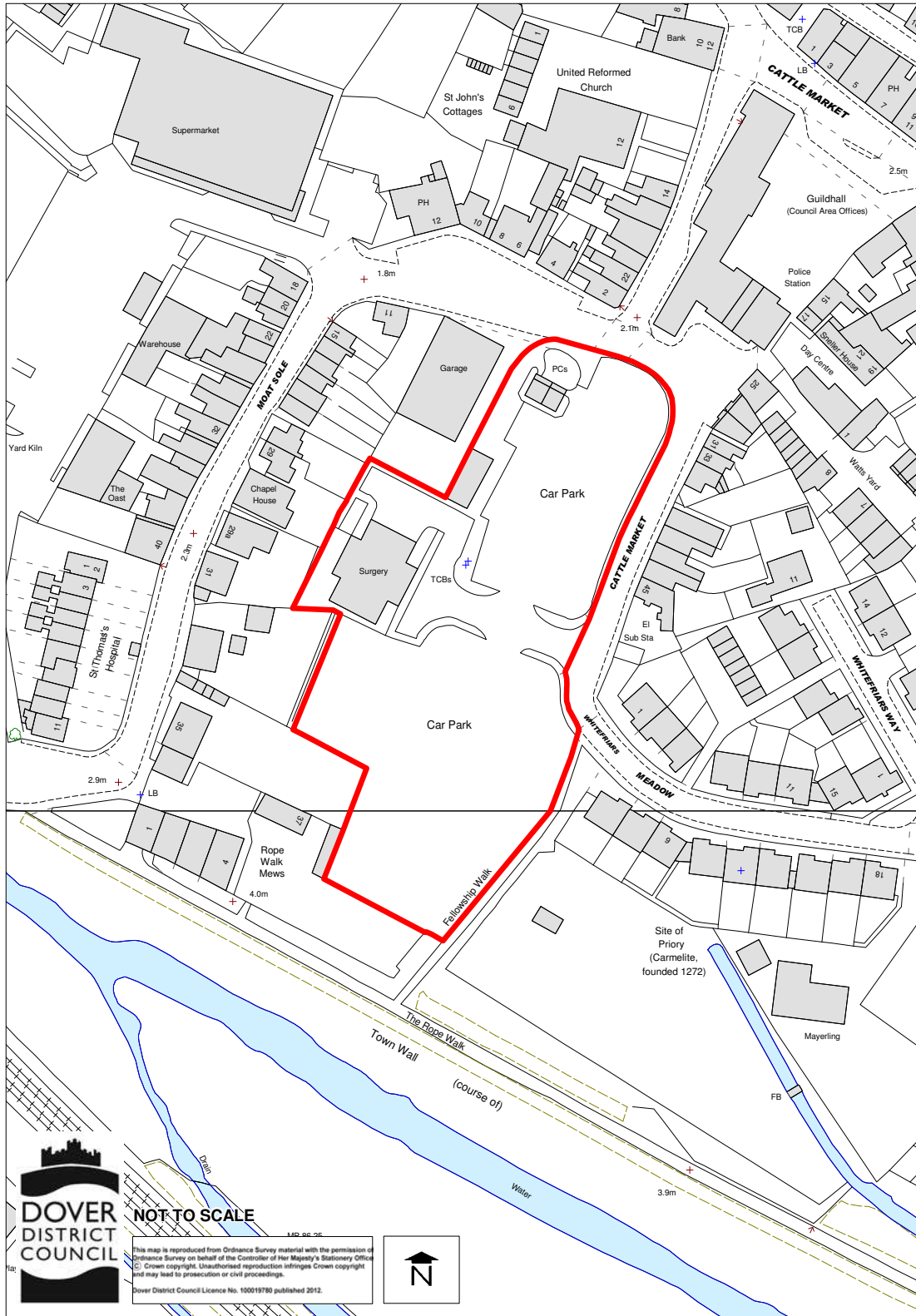


Map 3.19 Land to the rear of 133-147 St Richards Road, Deal

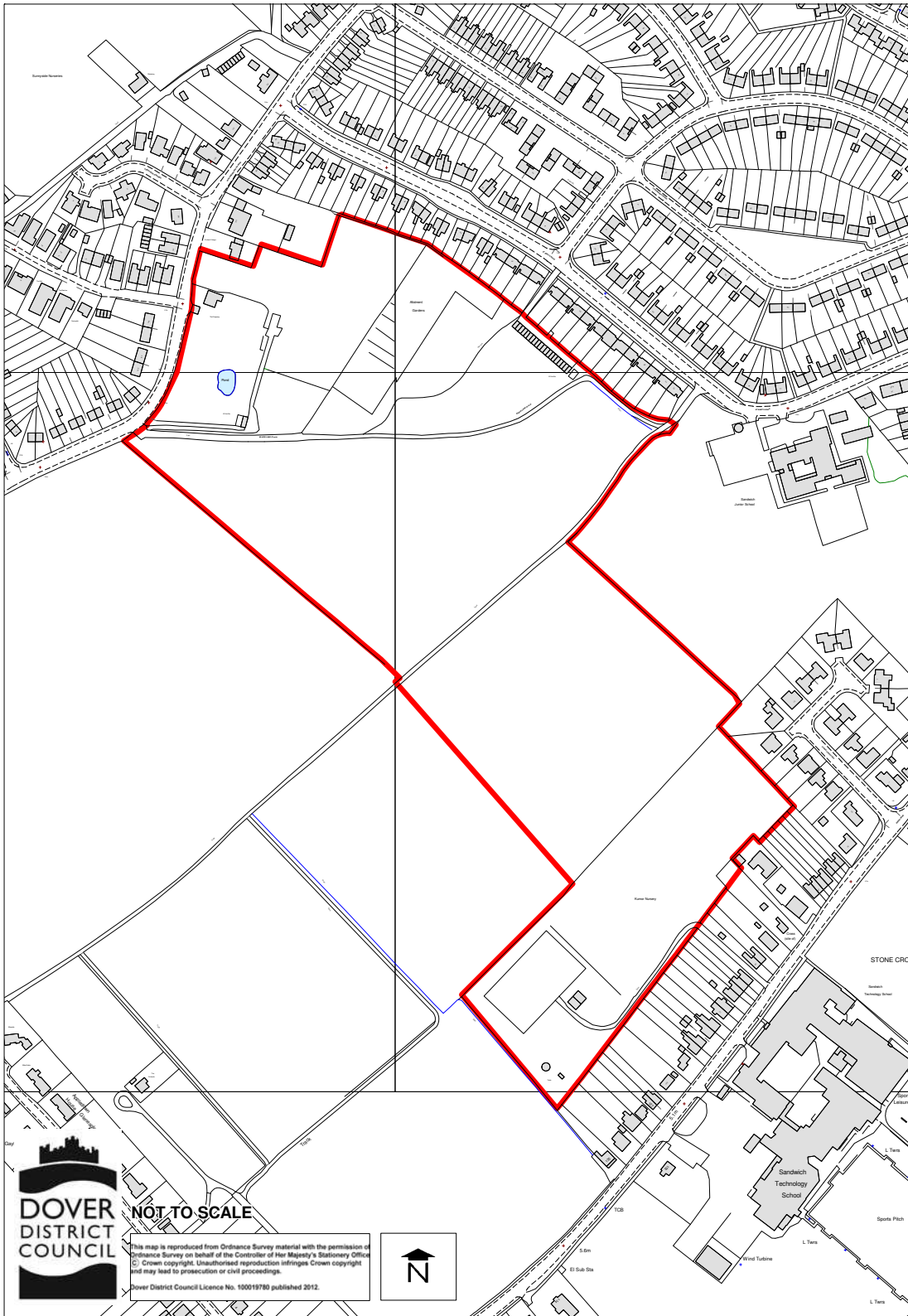


Map 3.20 Former Deal County Primary School

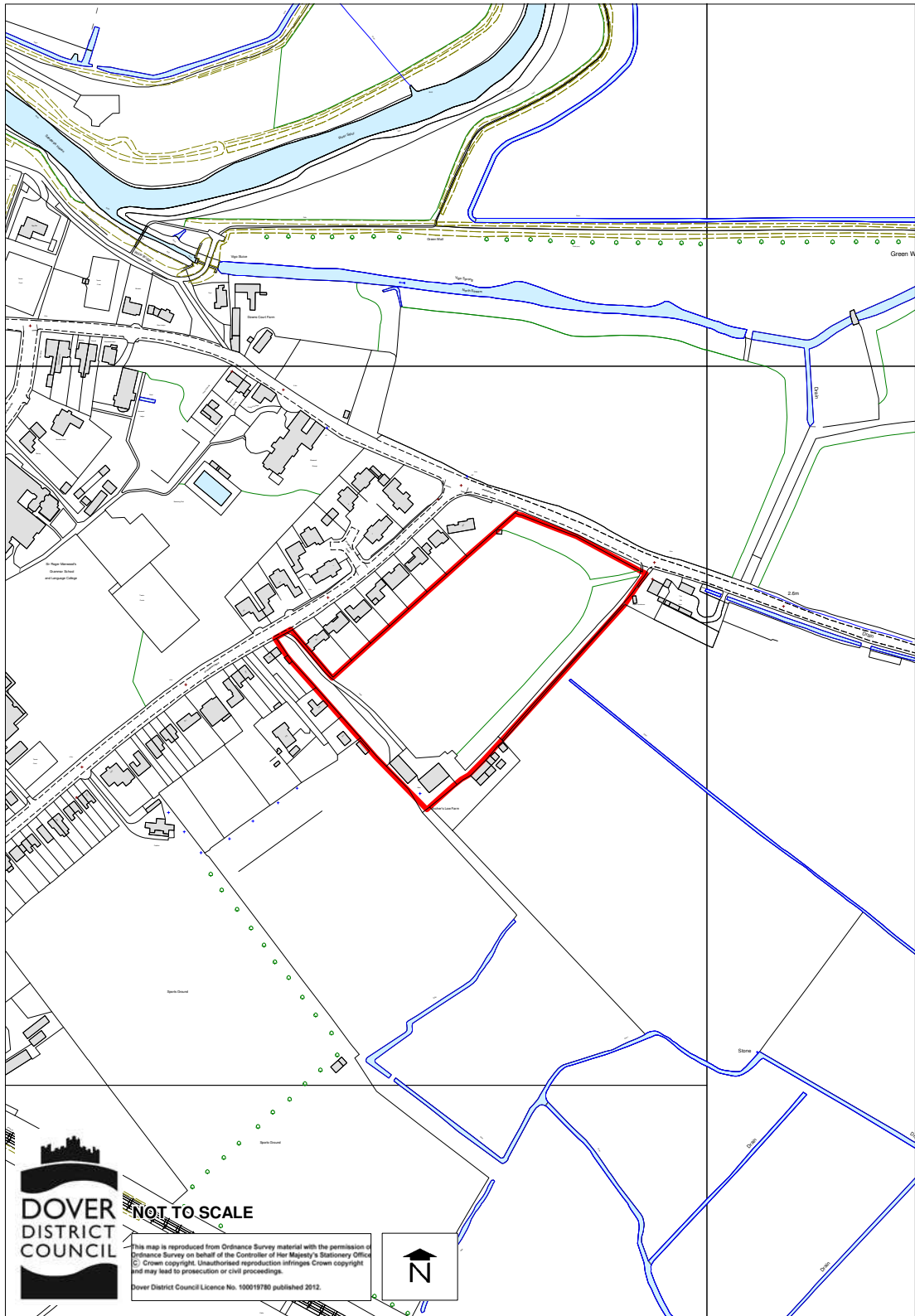
3.3 Sandwich



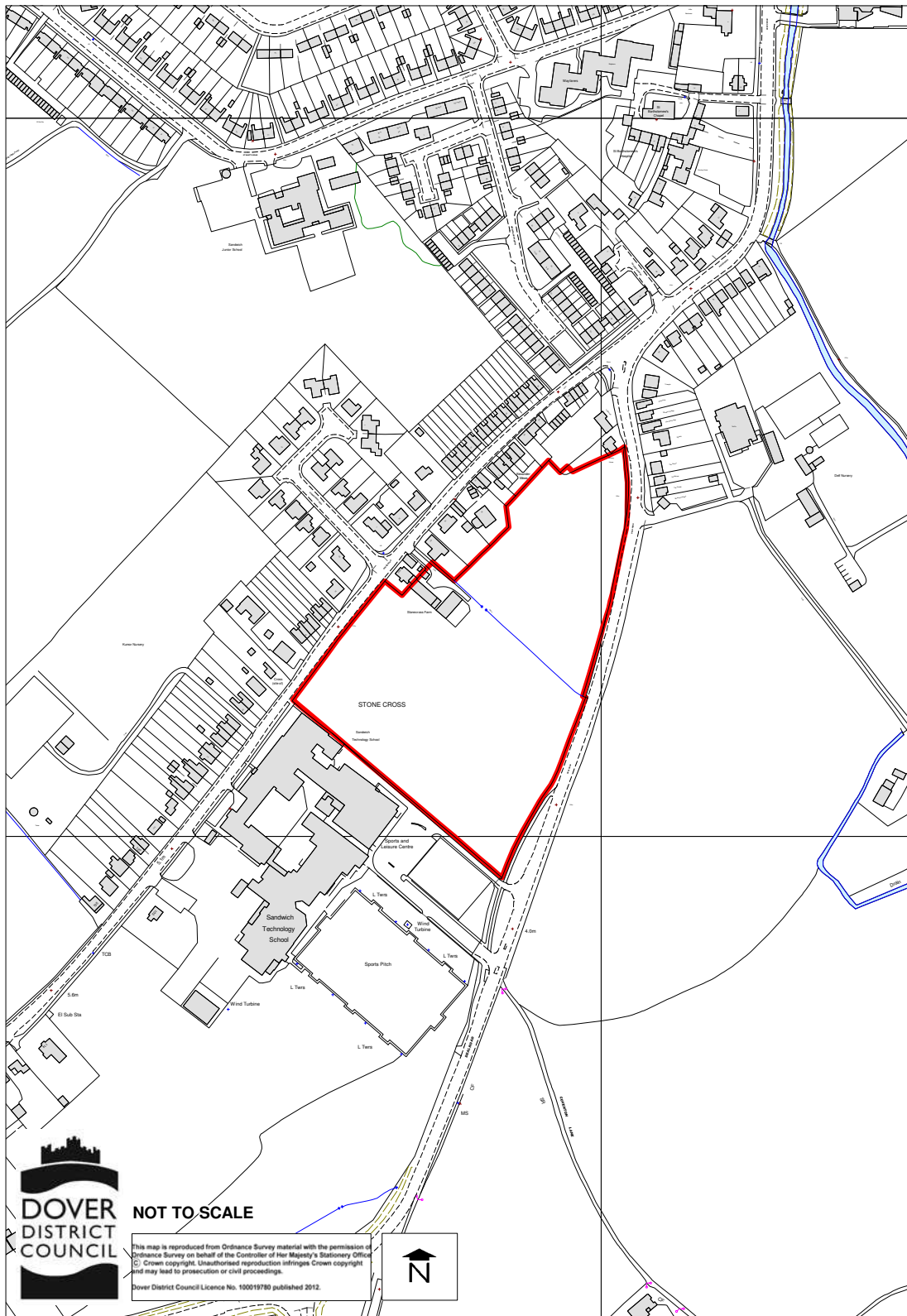
Map 3.21 Area allocated for a new convenience store in Sandwich



Map 3.22 Land to the west of St Bart's Road, including Kumar Nursery, Sandwich

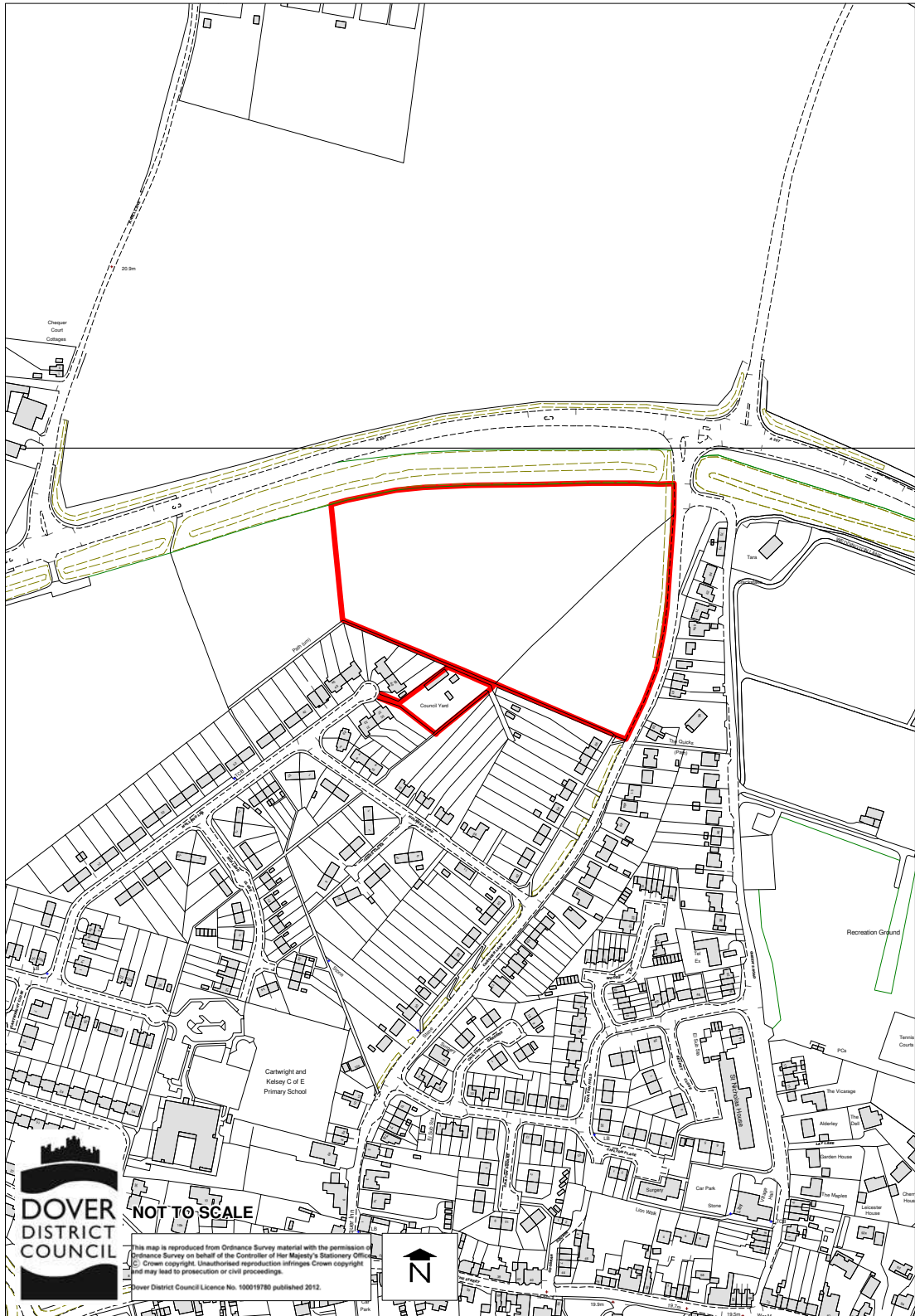


Map 3.23 Land at Archer's Low Farm, St George's Road, Sandwich

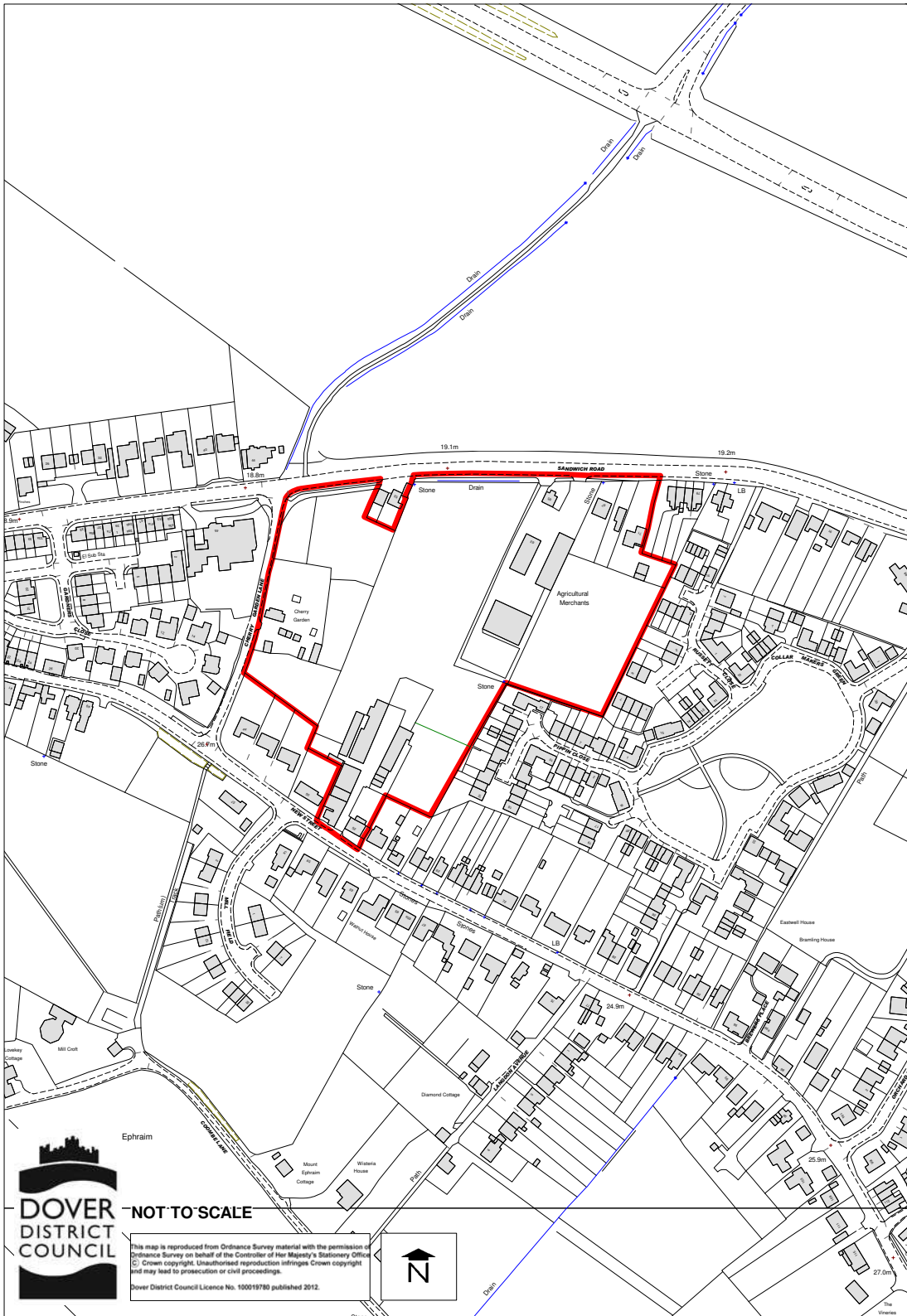


Map 3.24 Land adj Sandwich Technology School, Deal Road

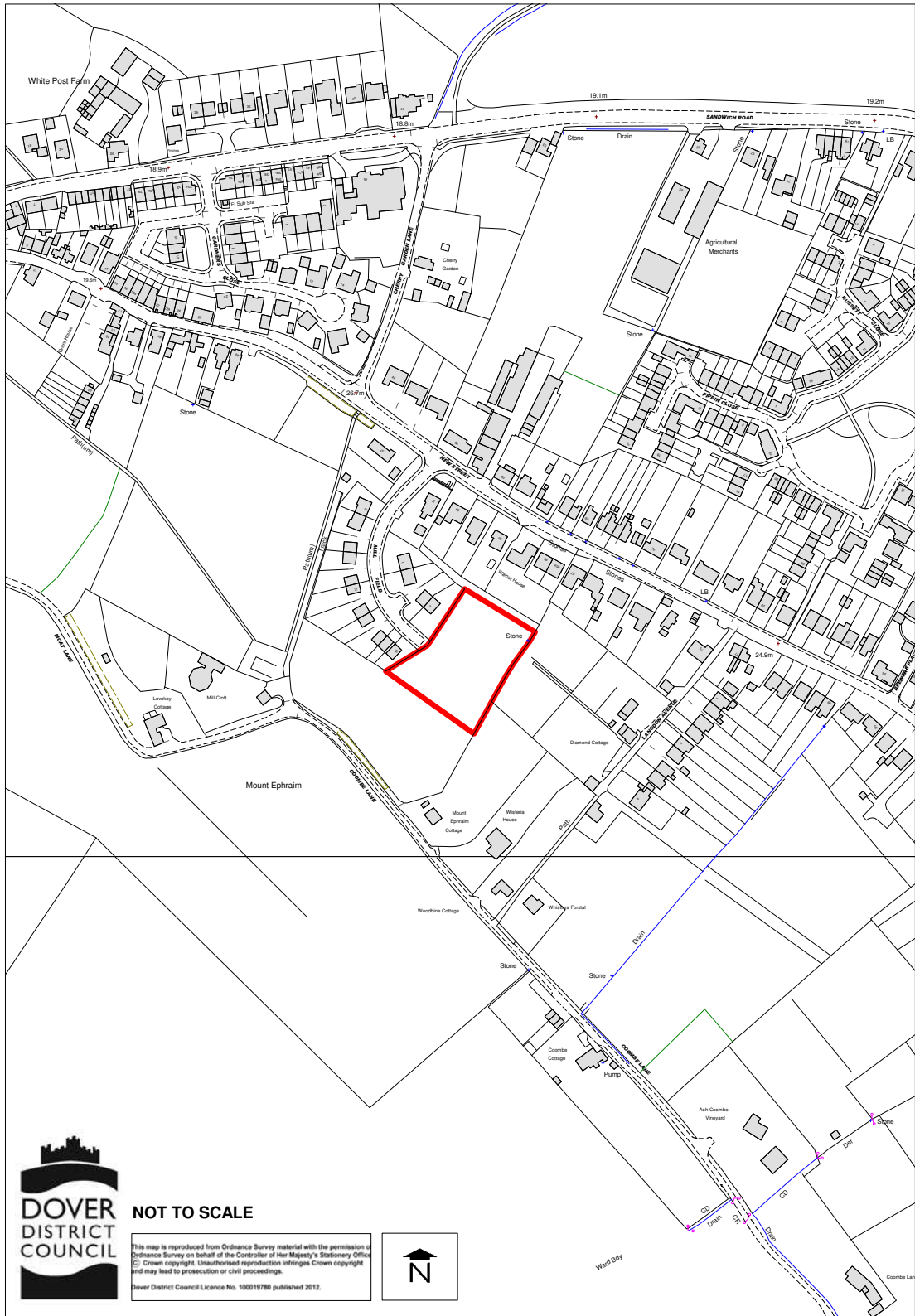
3.4 Local Centres



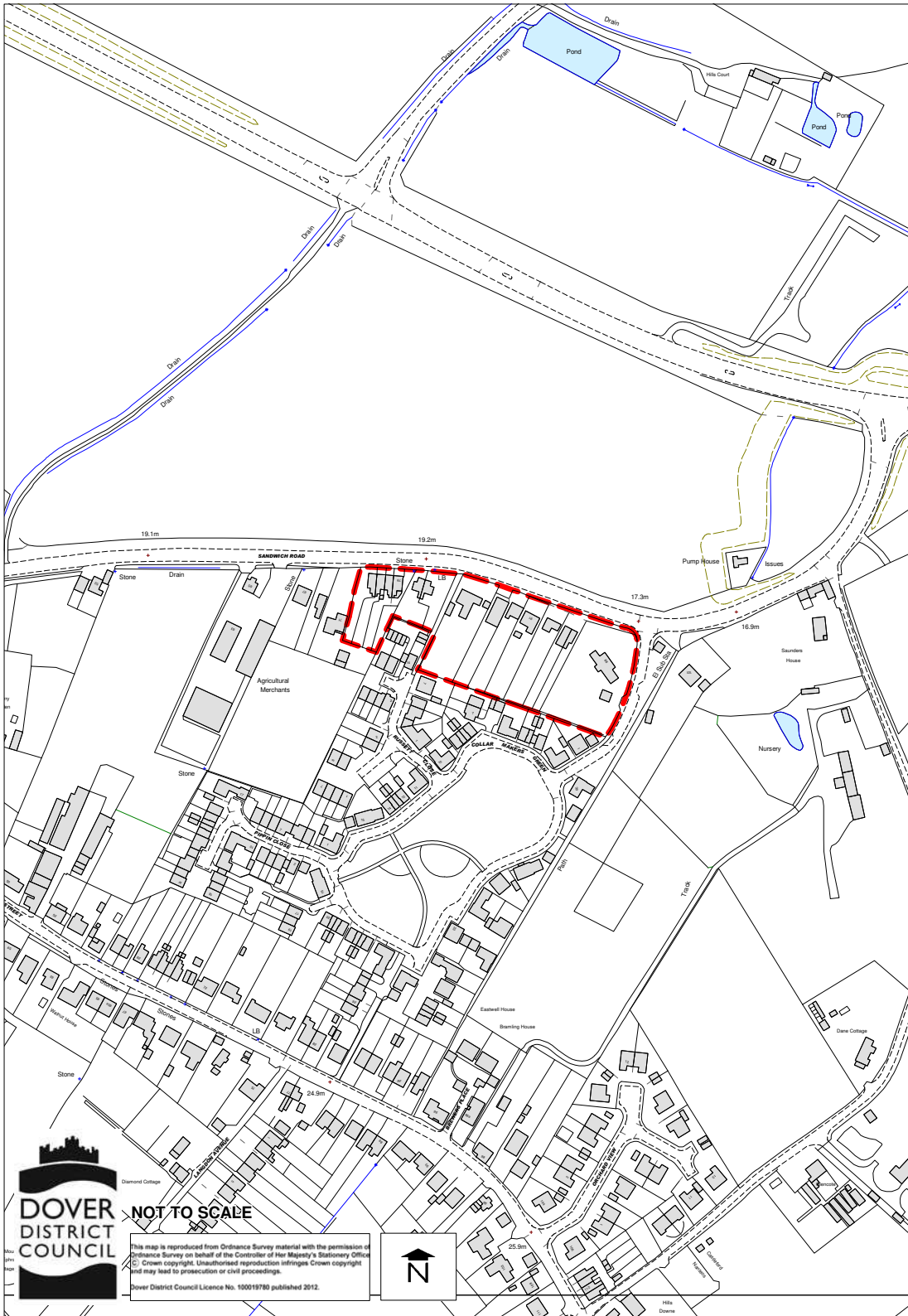
Map 3.25 Land at Chequer Lane & former Council Yard, Molland Lea, Ash



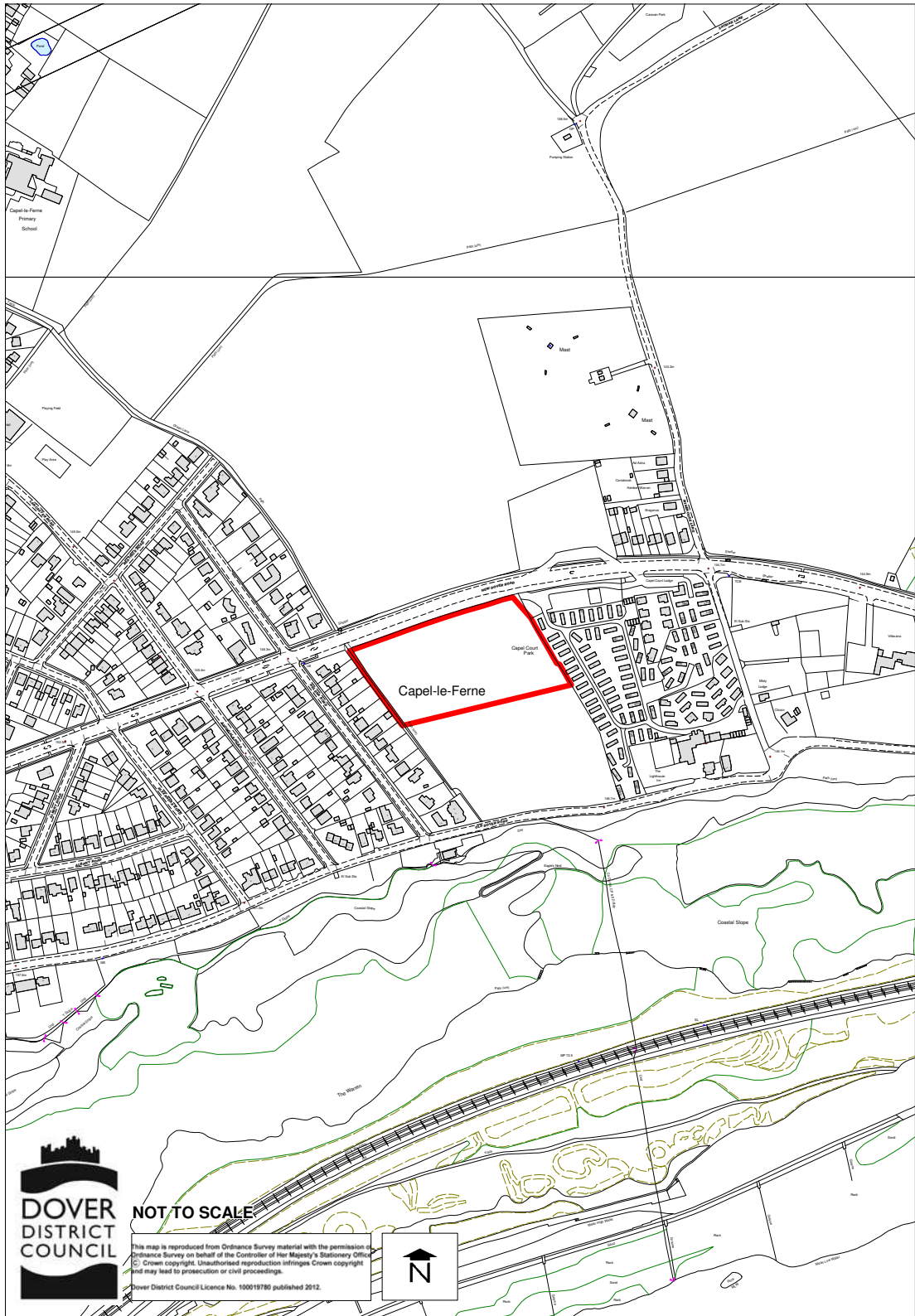
Map 3.26 Land between Cherry Garden Lane and 79 Sandwich Road, Ash



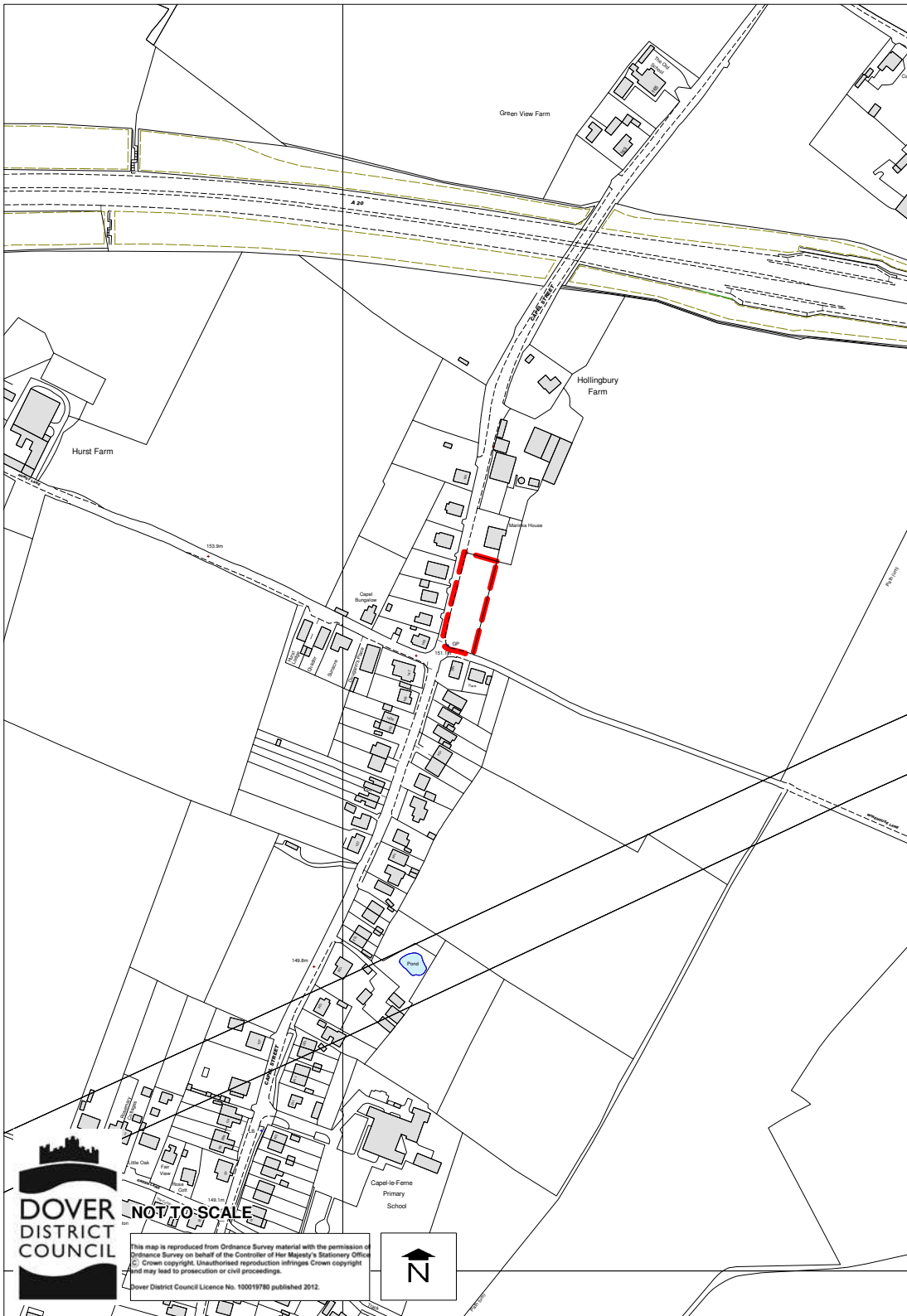
Map 3.27 Land at Millfield, Ash



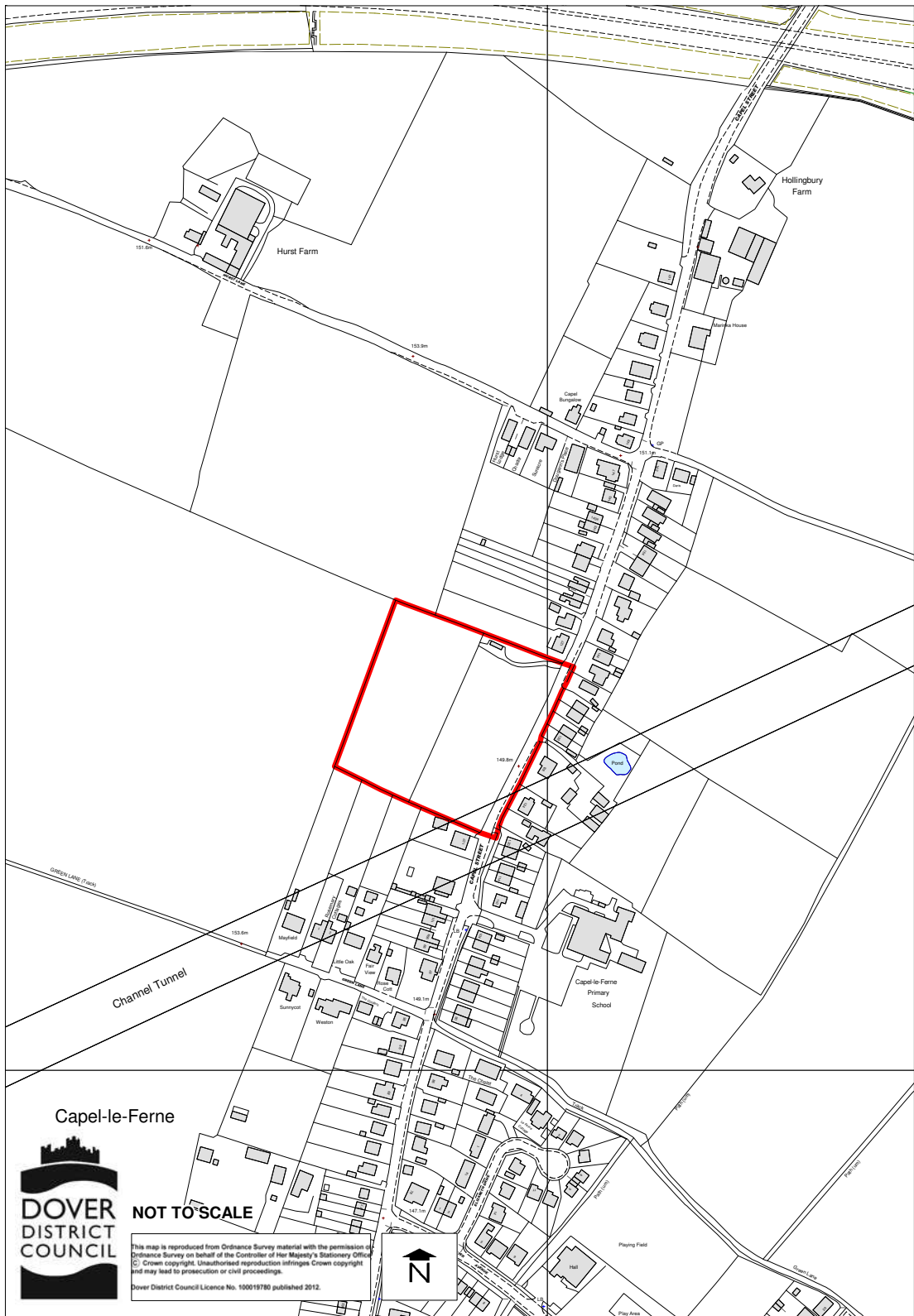
Map 3.28 67-99 Sandwich Road, Ash



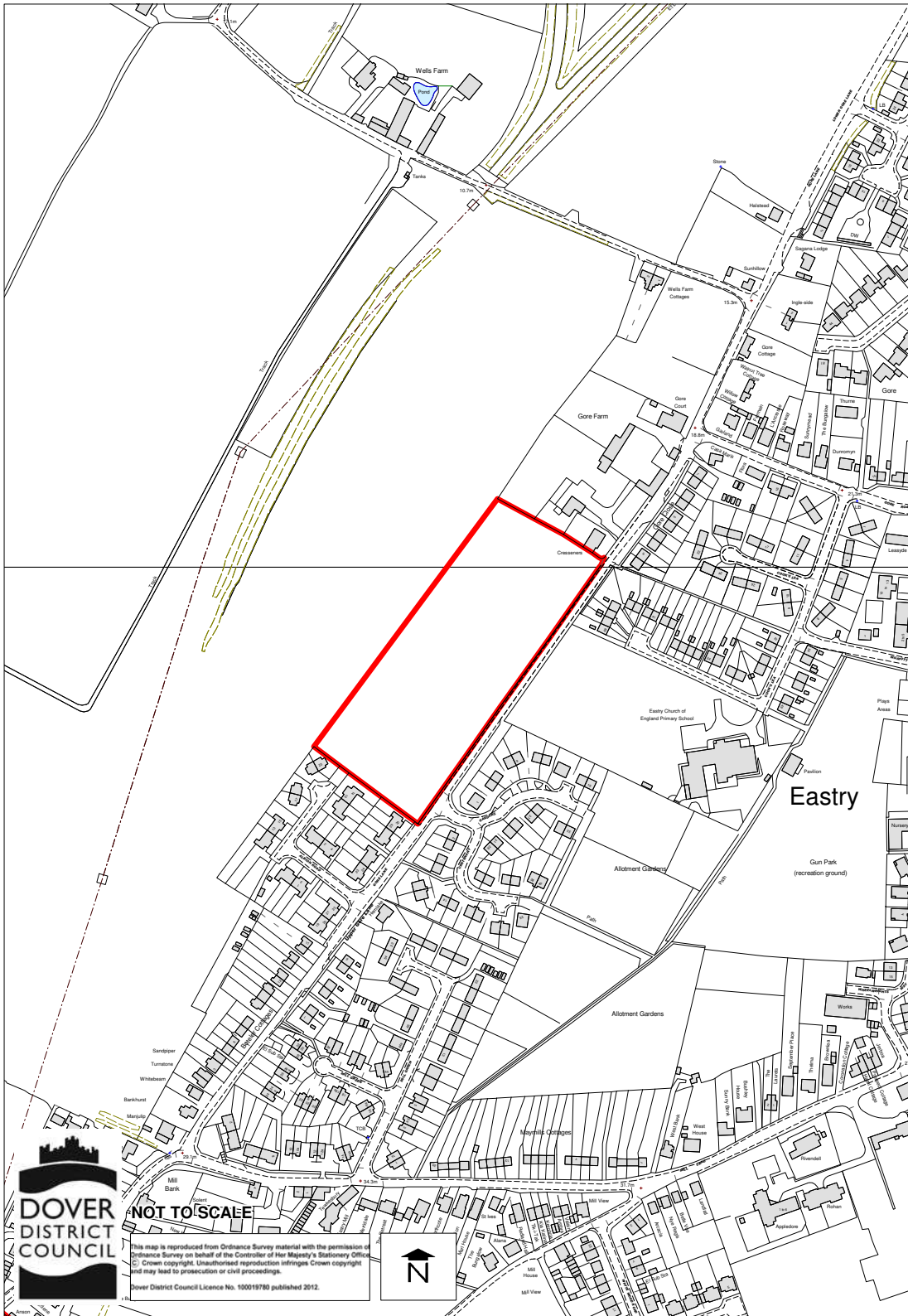
Map 3.29 Land to the south of New Dover Road, between Capel Court Caravan Park and Helena Road, Capel le Ferne



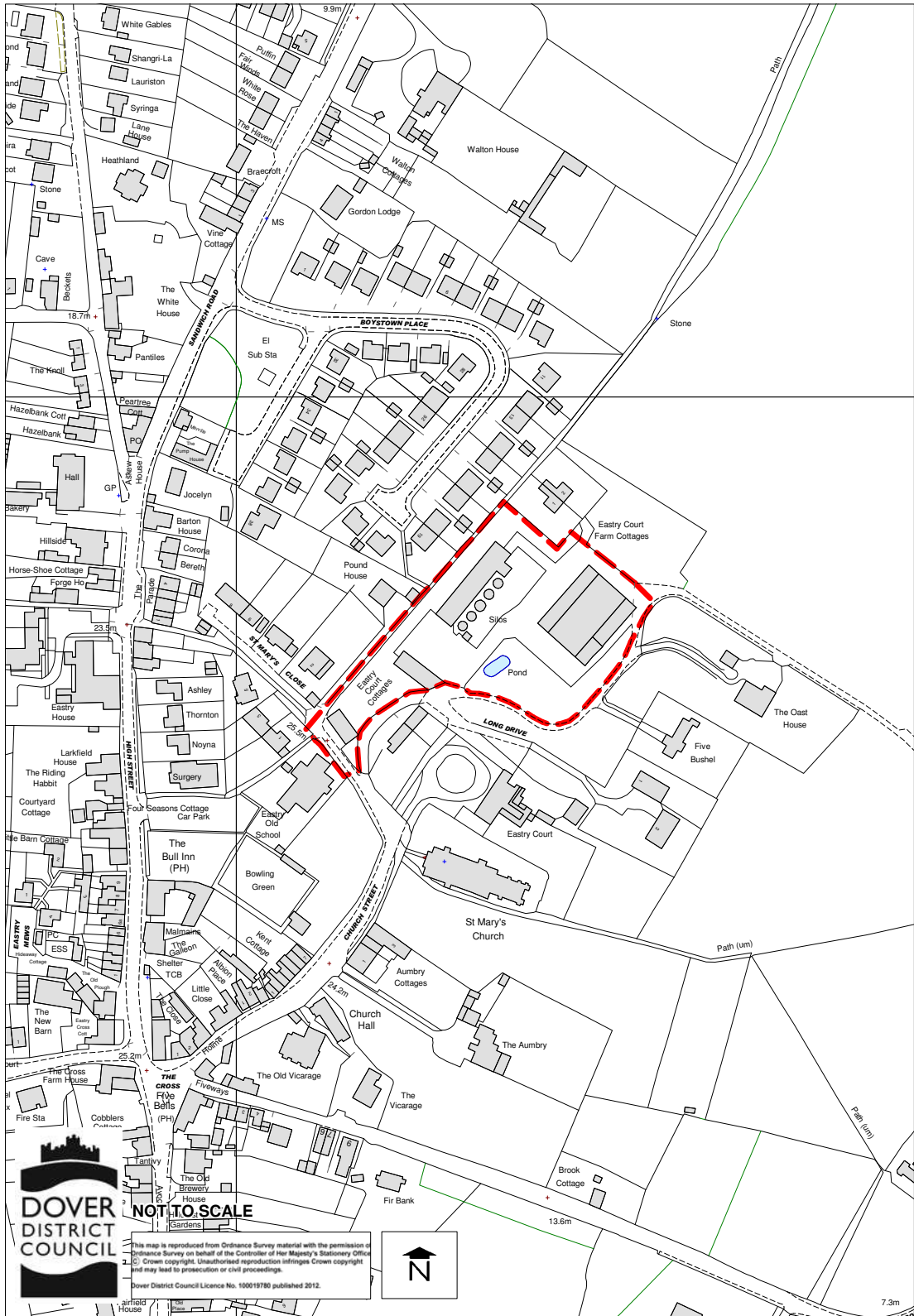
Map 3.30 Land to the north of the junction of Capel Street and Winehouse Lane, Capel le Ferne



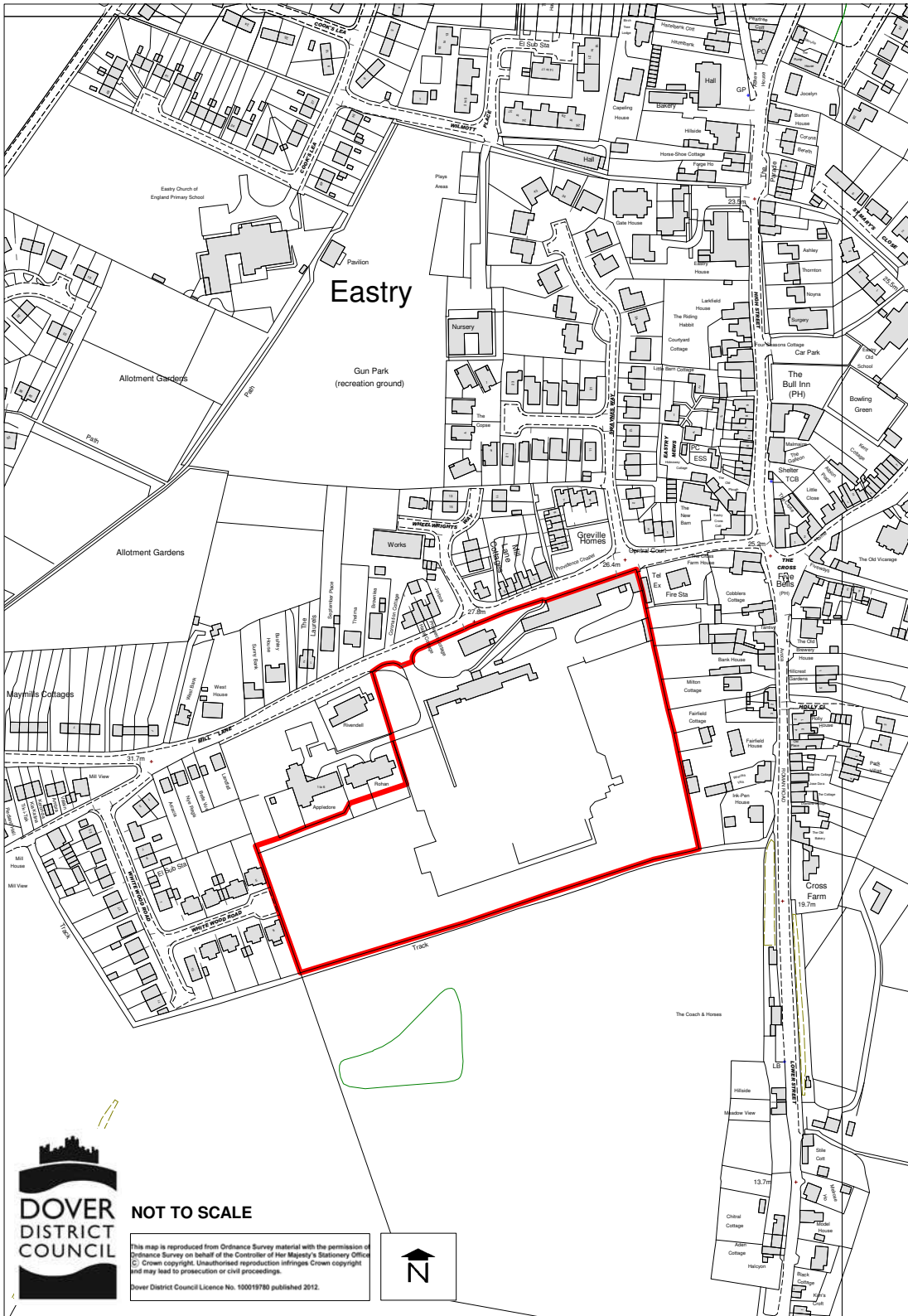
Map 3.31 Land between 107 and 127 Capel Street, Capel le Ferne



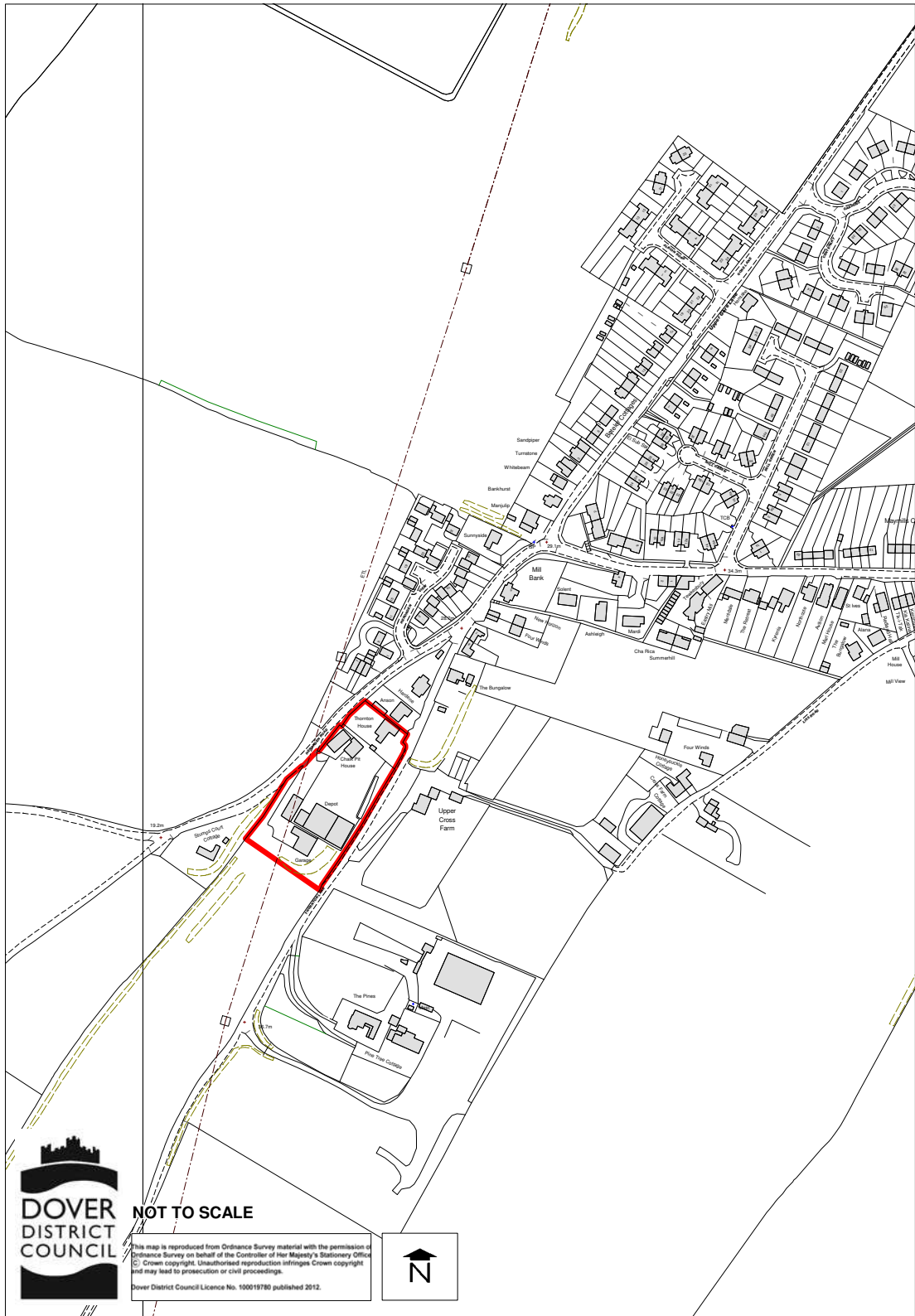
Map 3.32 Gore Field, Gore Lane, Eastry



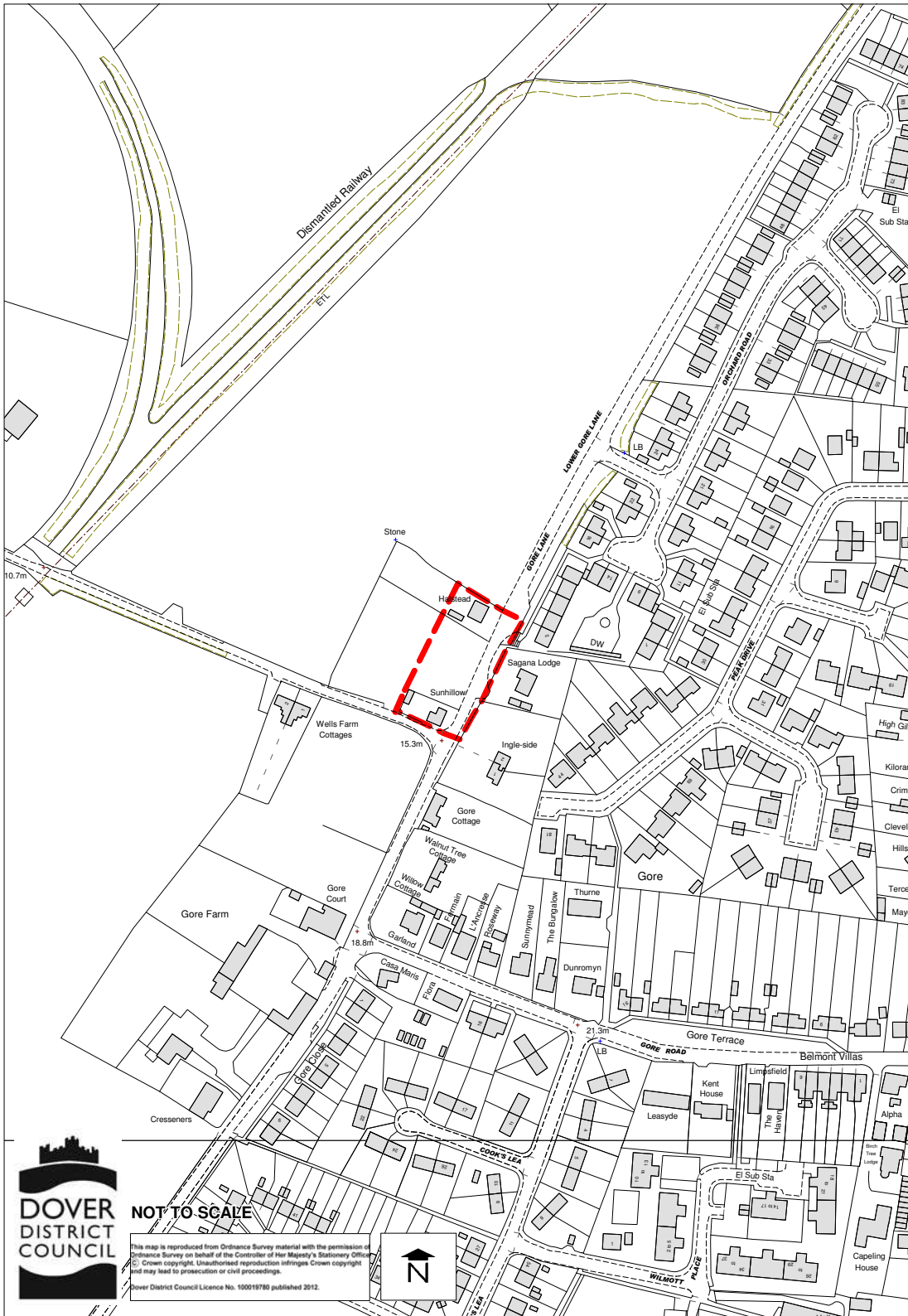
Map 3.33 Eastry Court Farm, St Mary's Close, Eastry



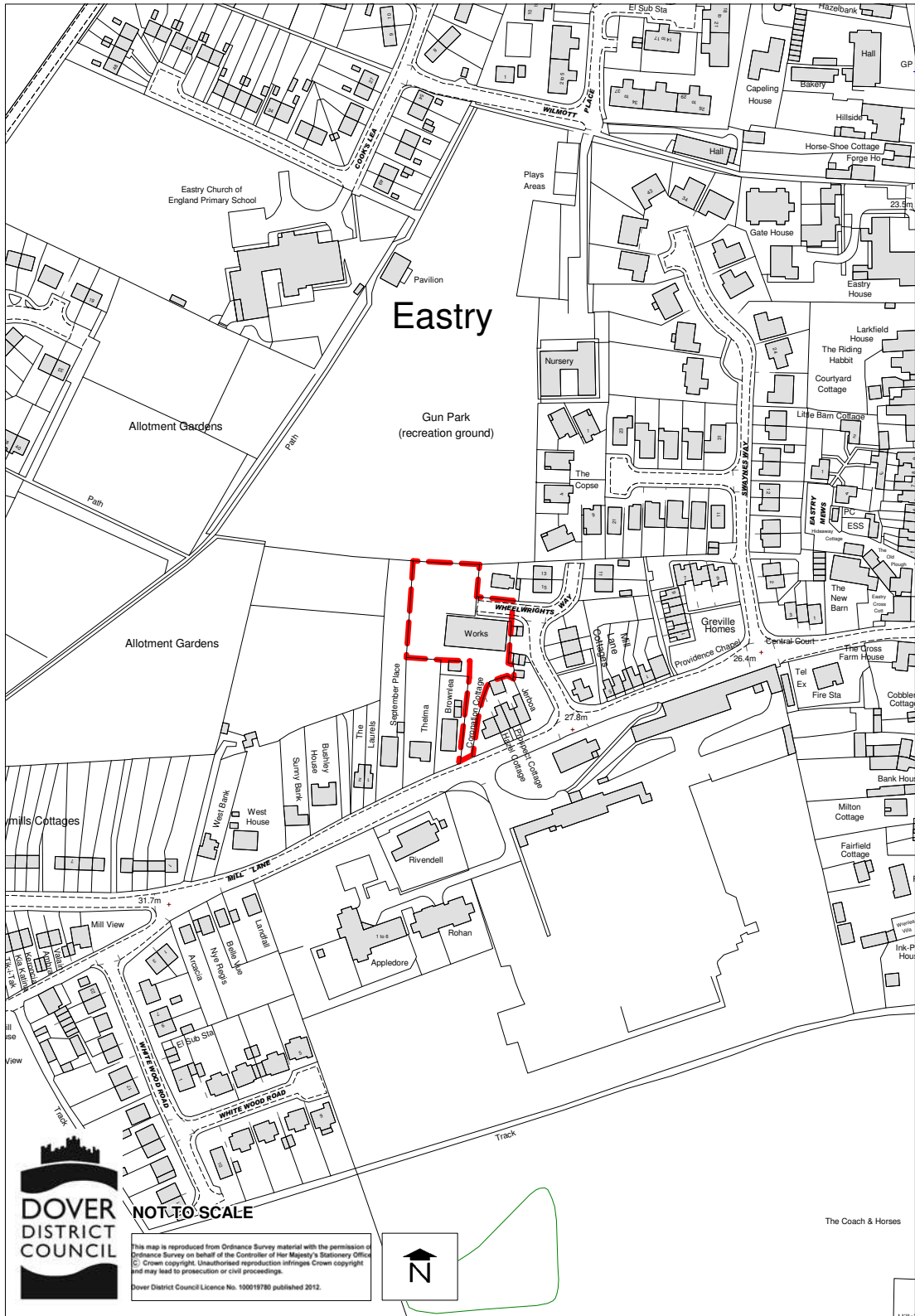
Map 3.34 Eastry Hospital, Mill Lane, Eastry



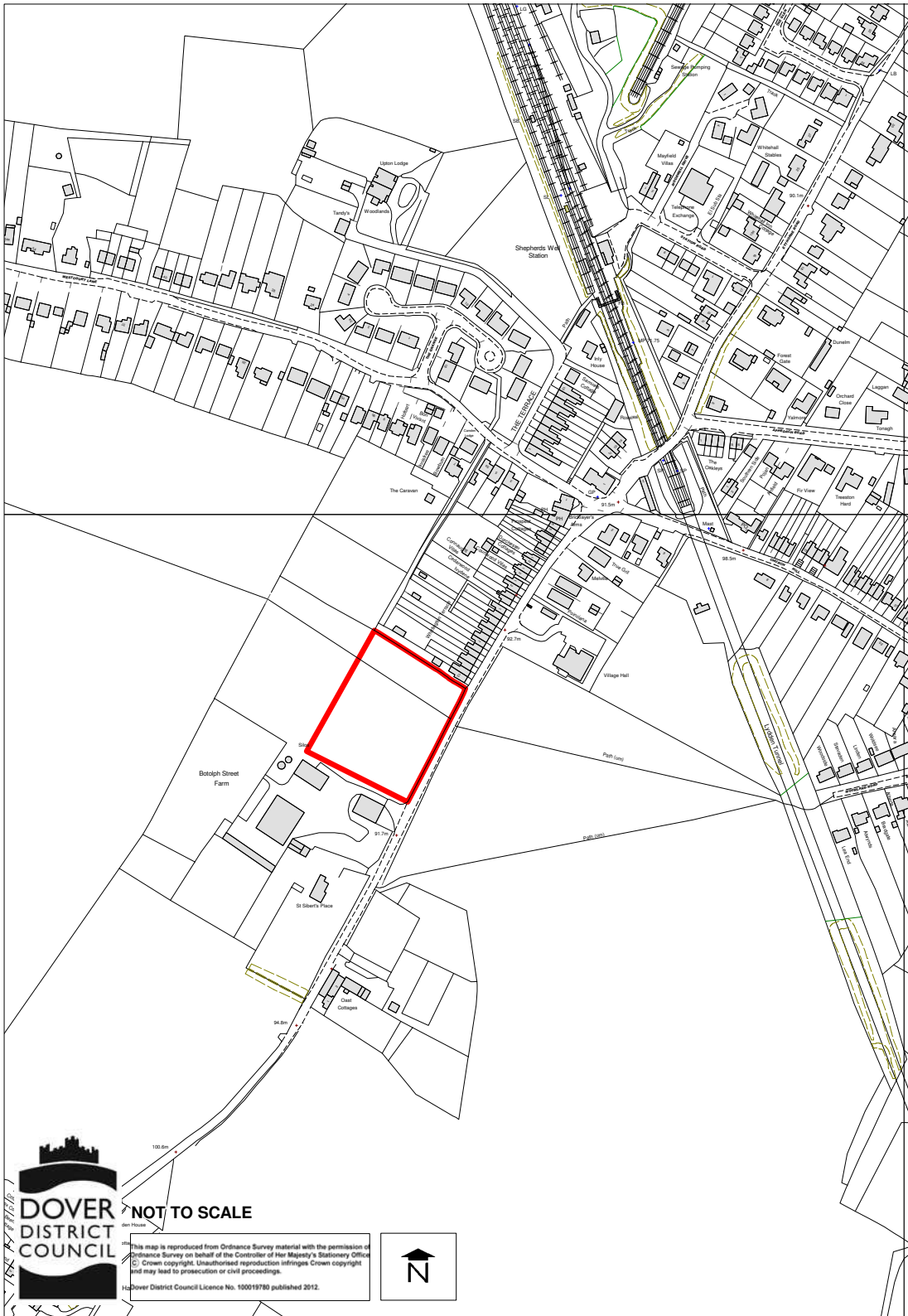
Map 3.35 The Old Chalk Pit, Heronden Road, Eastry



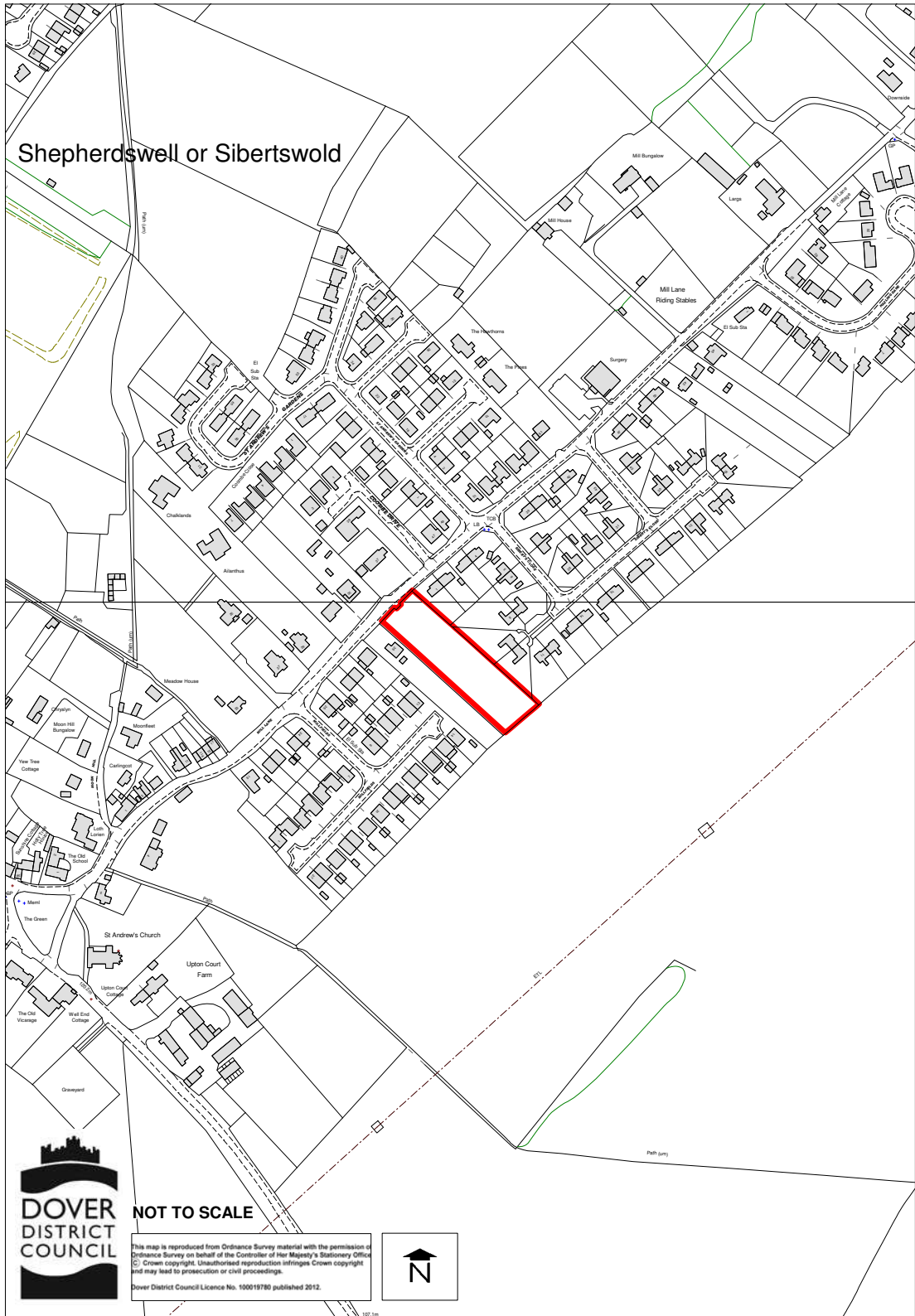
Map 3.36 Land to the west of Gore Lane, Eastry



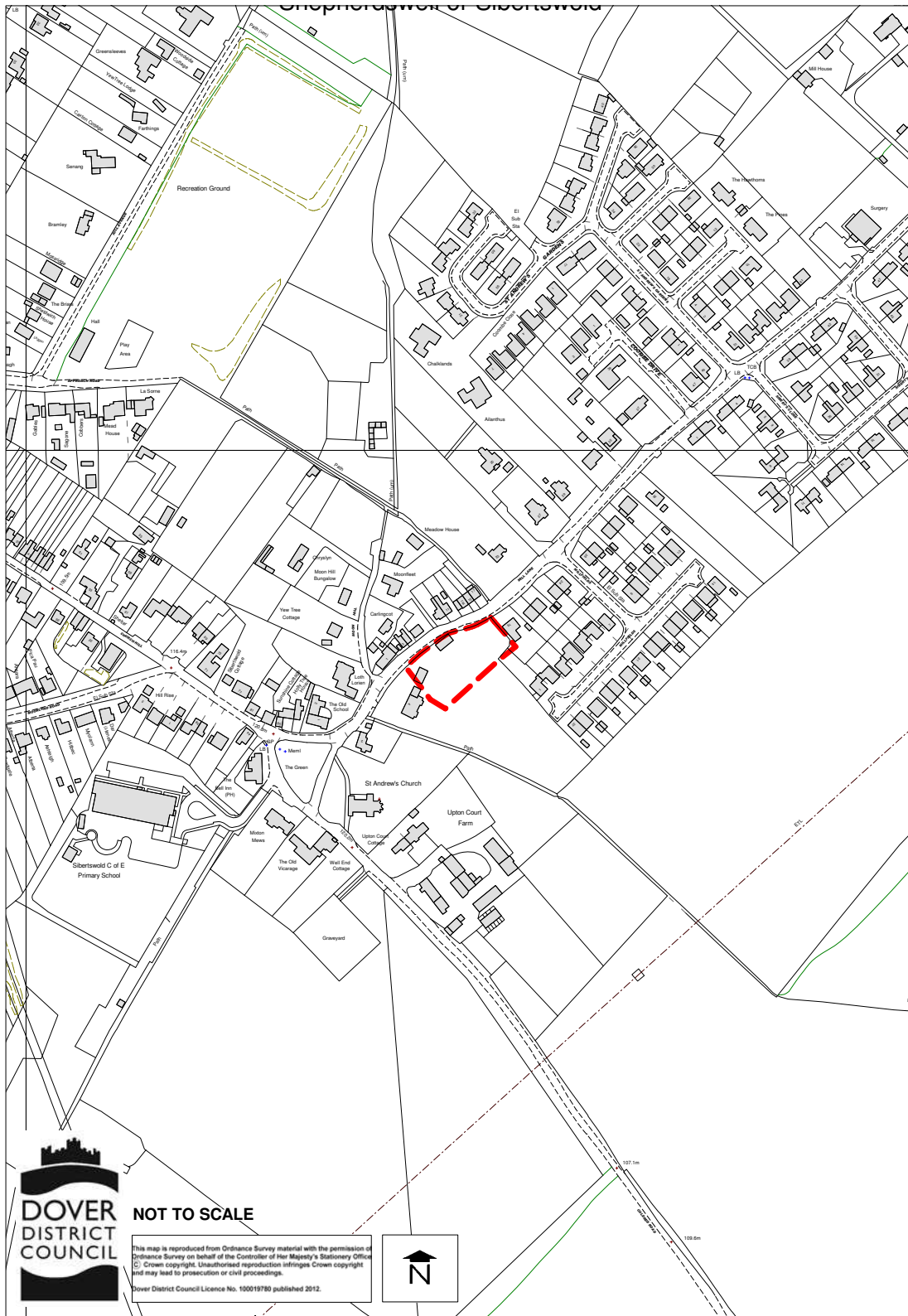
Map 3.37 Units to the rear of Coronation Cottage, Mill Lane, Eastry

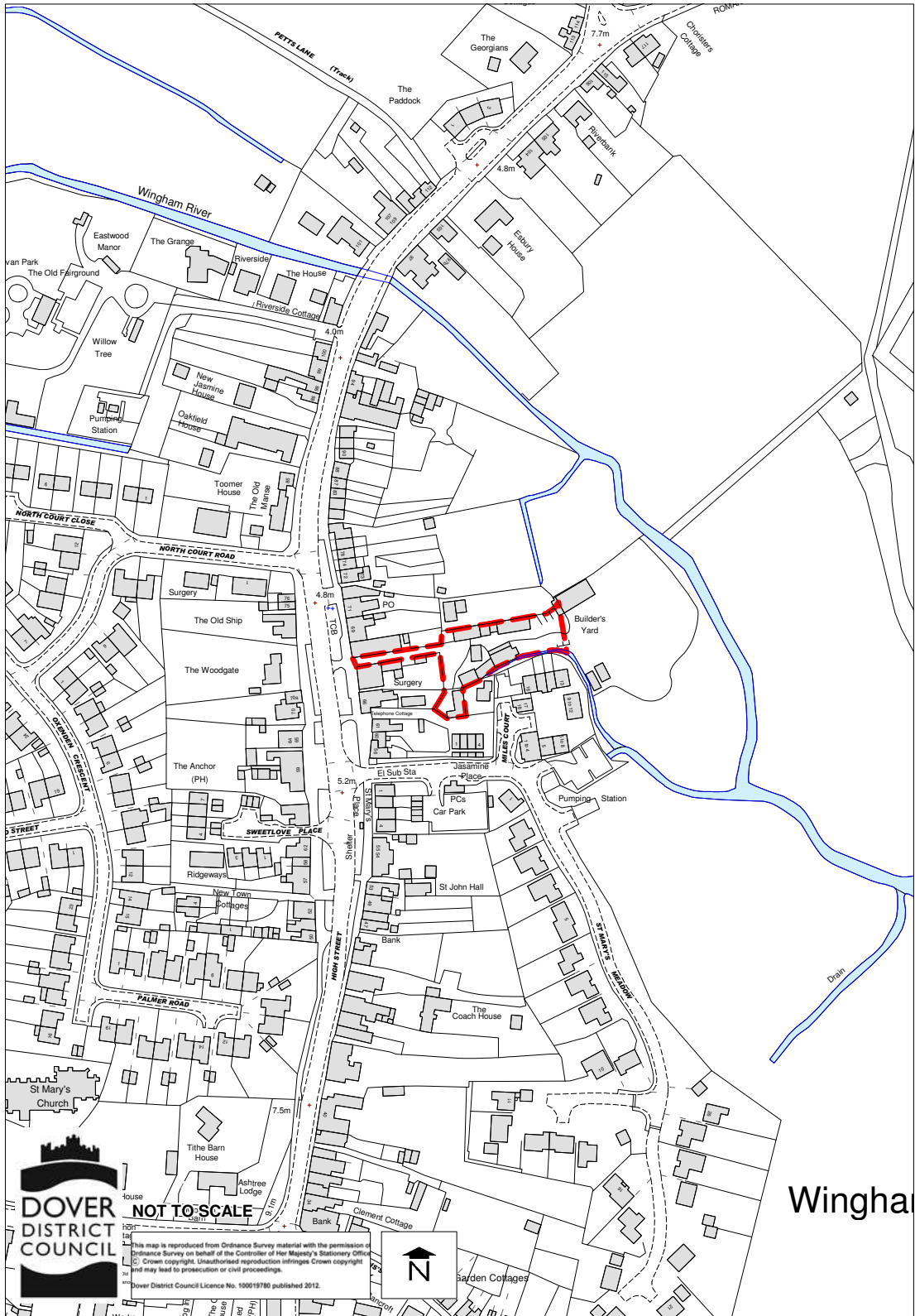


Map 3.38 Land to the west of Coxhill, Shepherdswell



Map 3.39 Land off Mill Lane, Shepherdswell



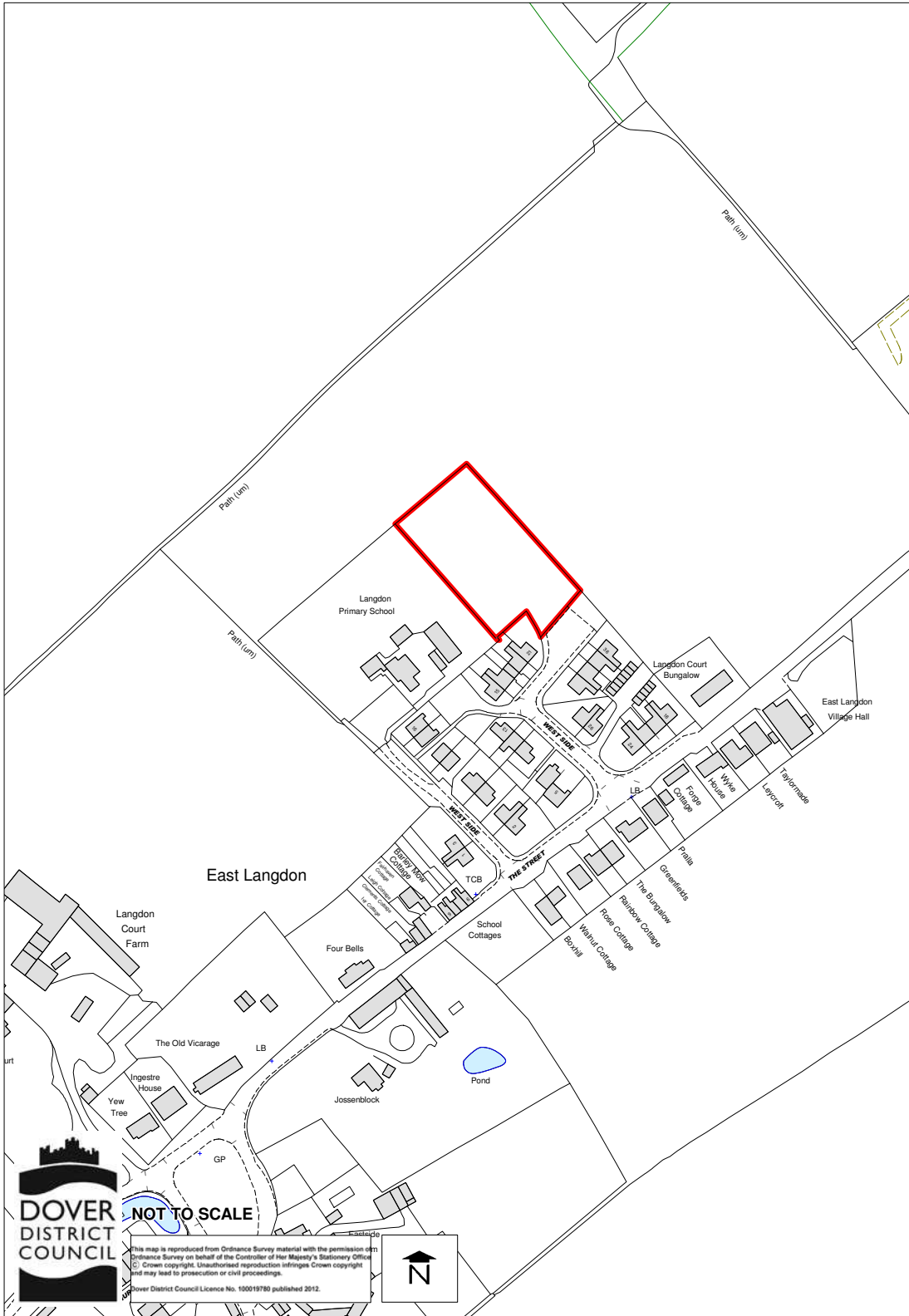


Map 3.41 Builder's Yard, 67 High Street, Wingham

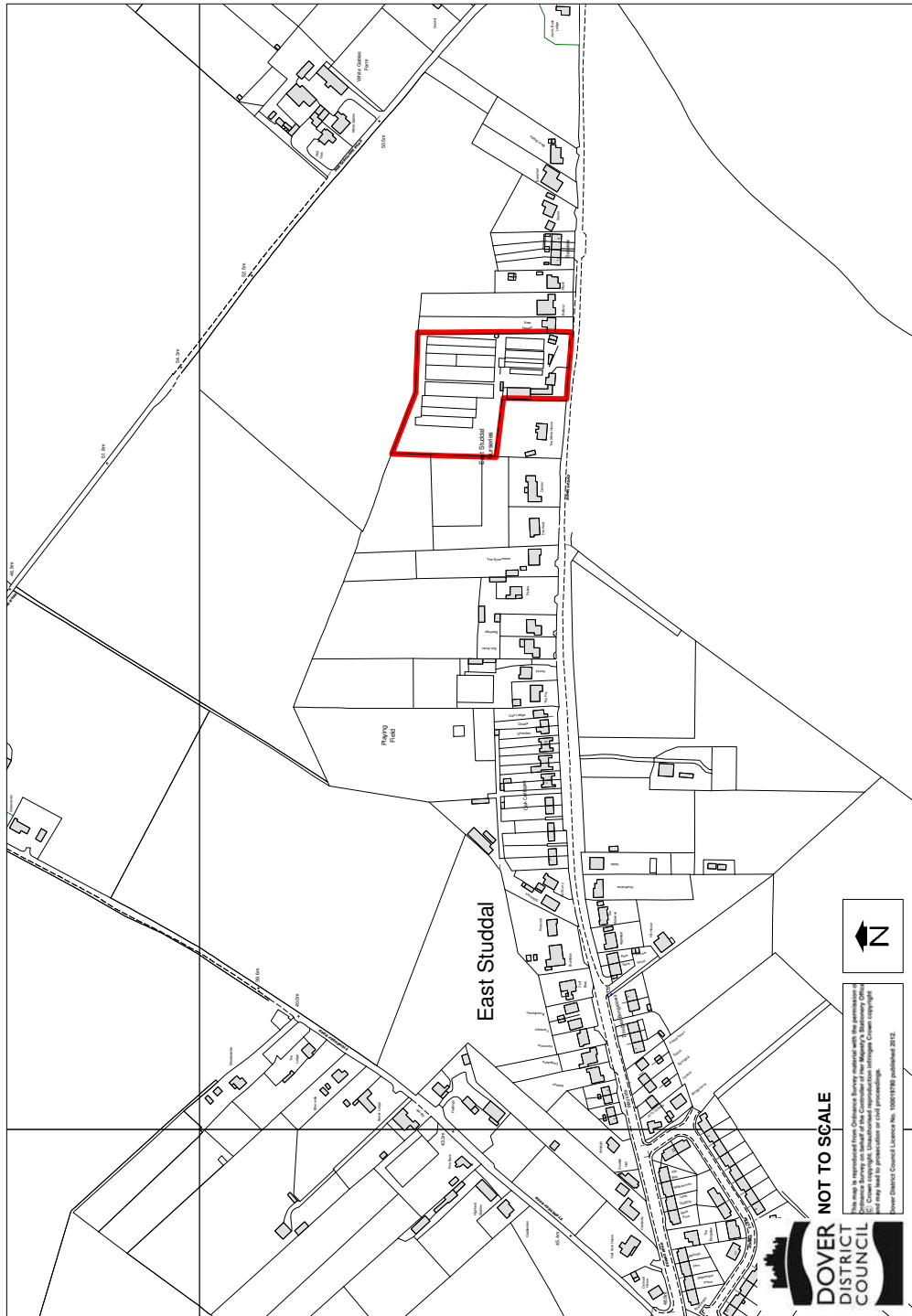


Map 3.42 Land north of College Way, Wingham

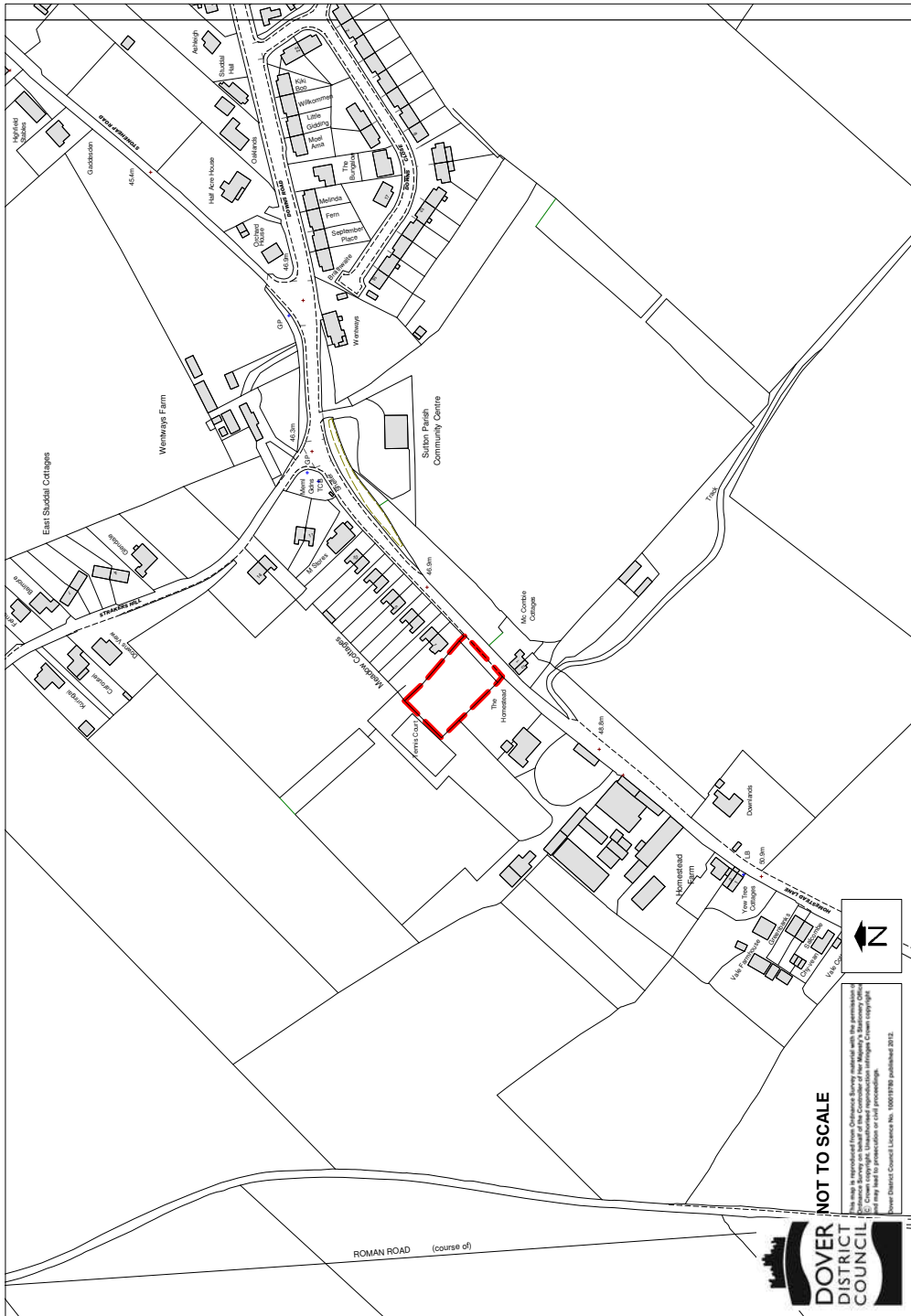
3.5 Villages



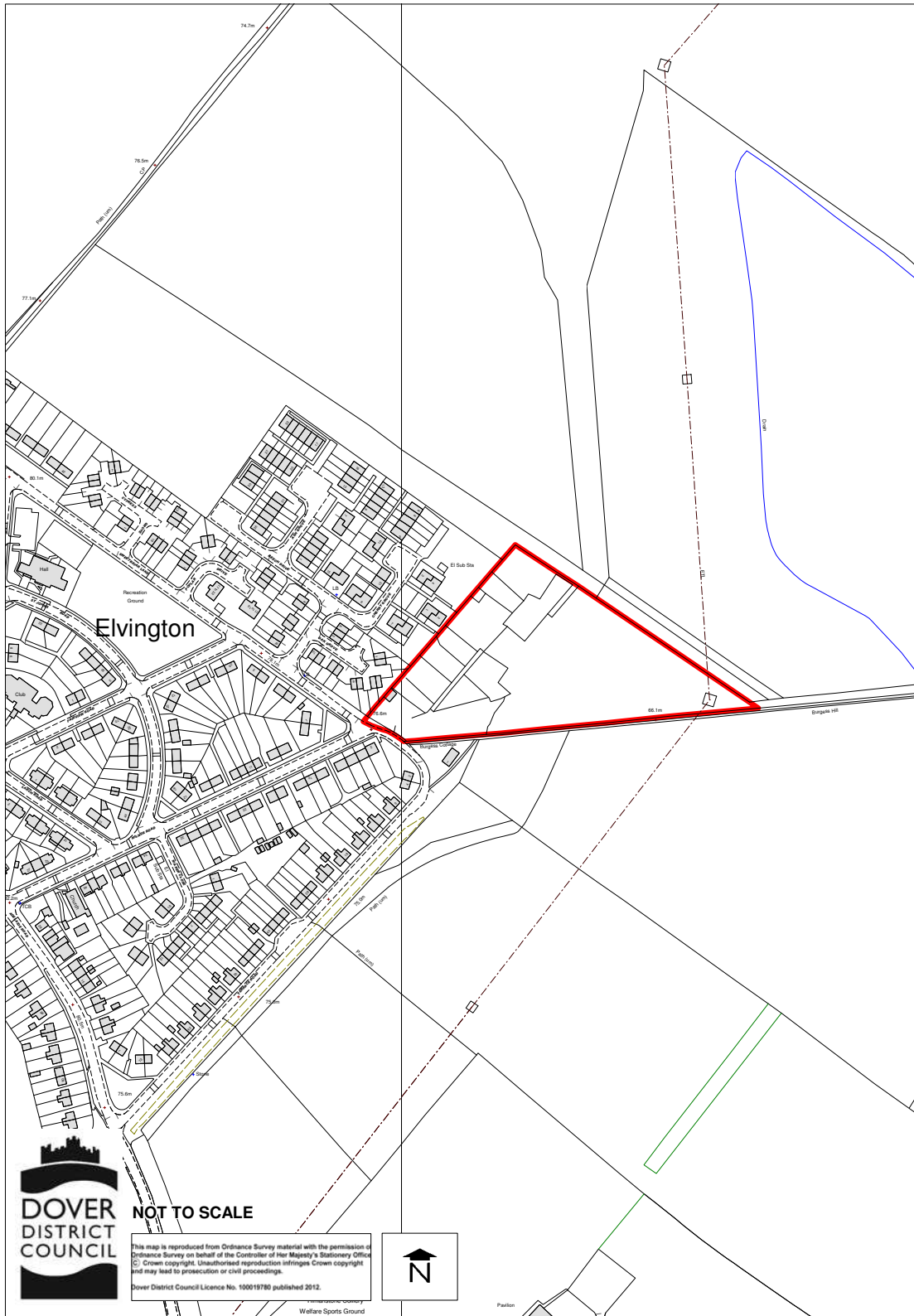
Map 3.44 North of Langdon Primary School, East Langdon



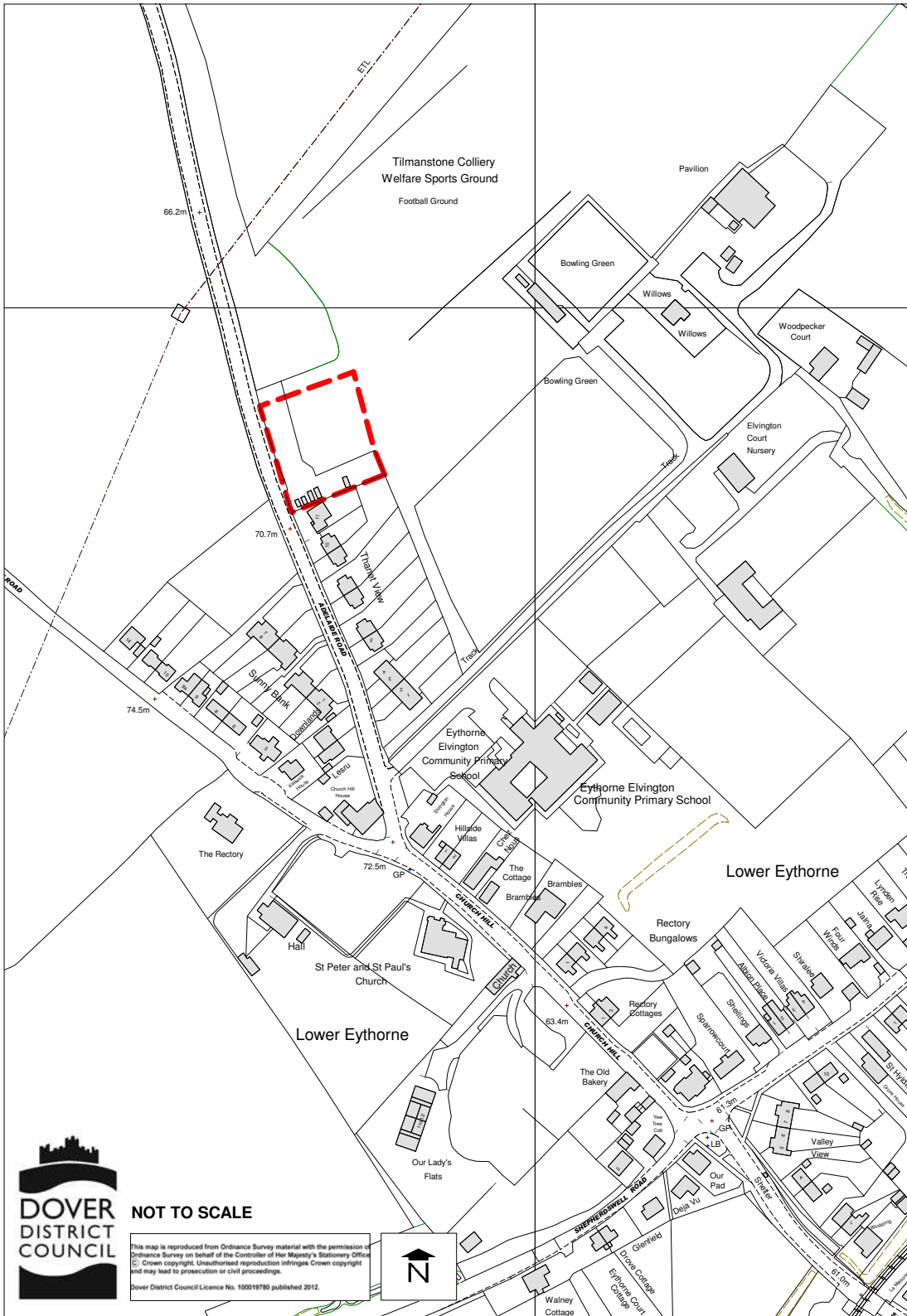
Map 3.45 East Studdal Nursery, Downs Road, East Studdal



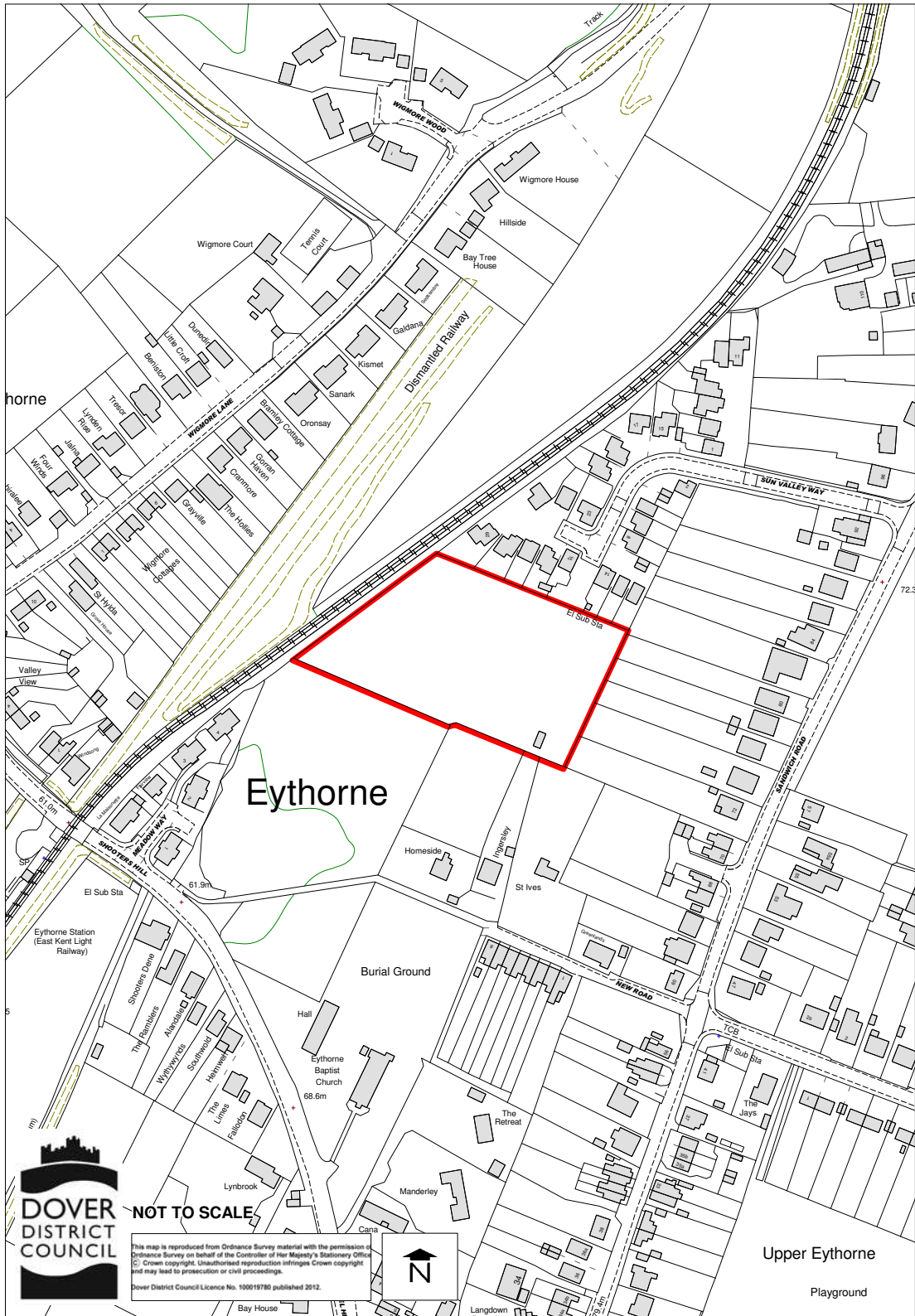
Map 3.46 Homestead Lane, East Studdal



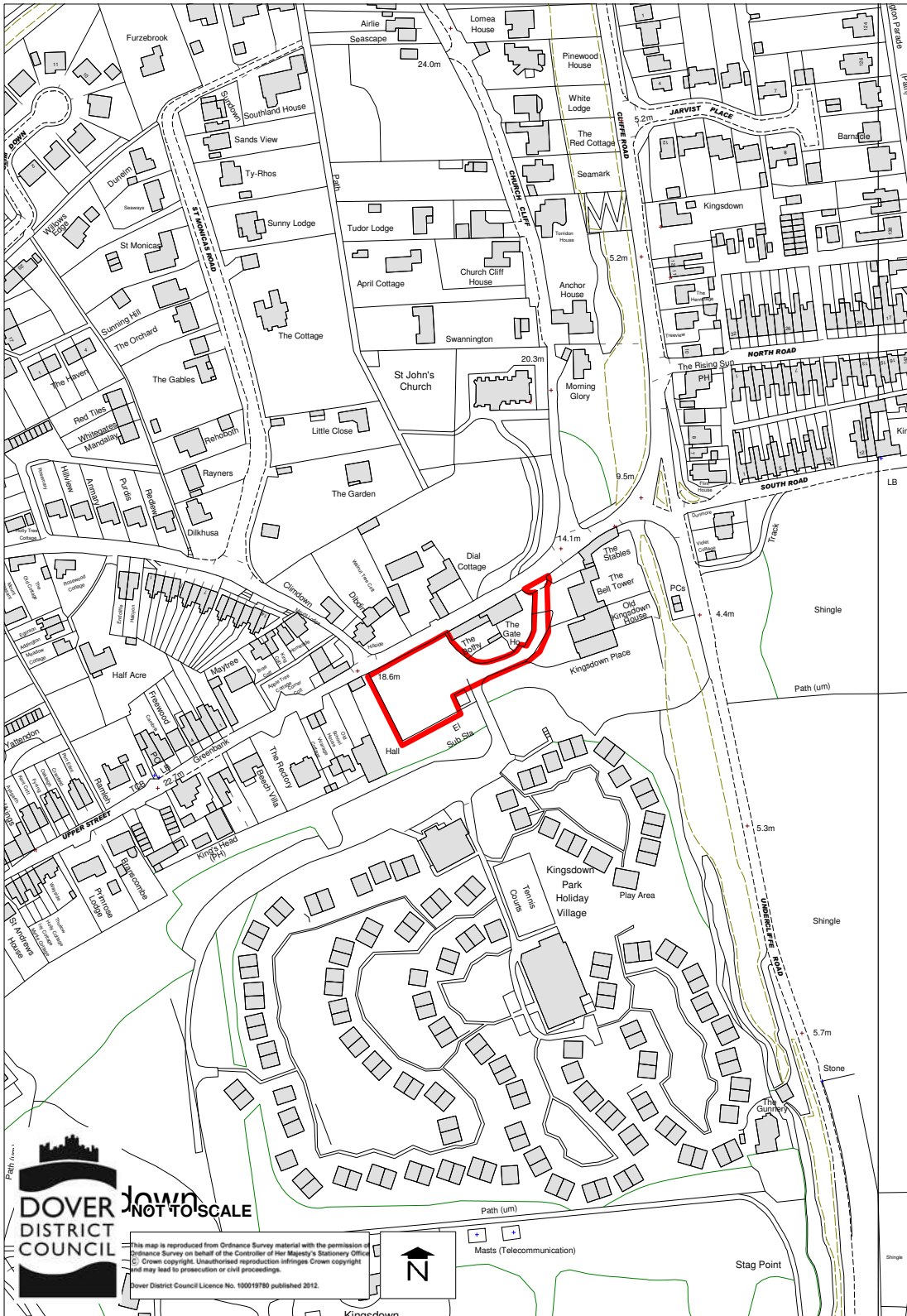
Map 3.47 Sweetbriar Lane, Elvington



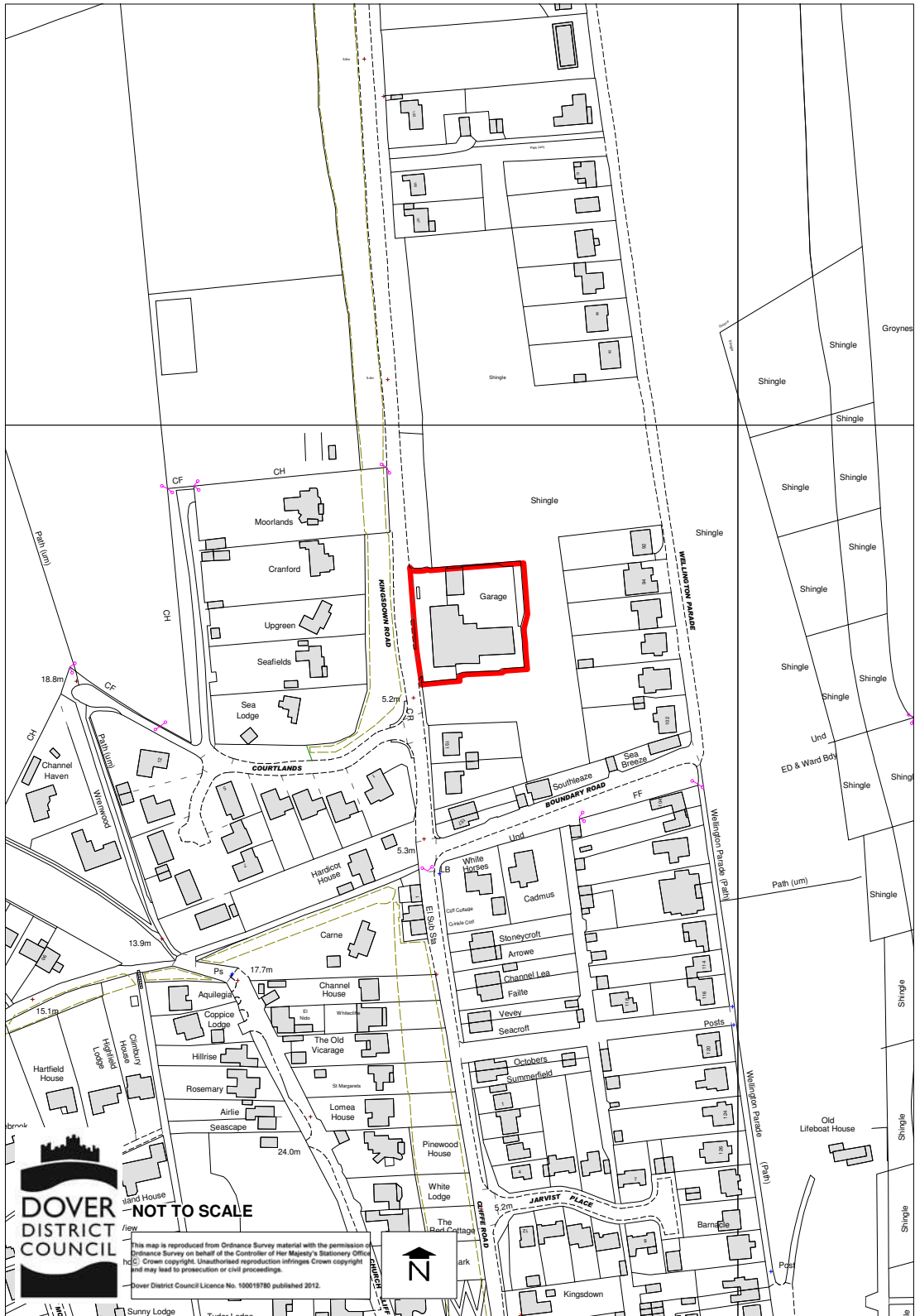
Map 3.48 Land to the east of Adelaide Road, Eythorne



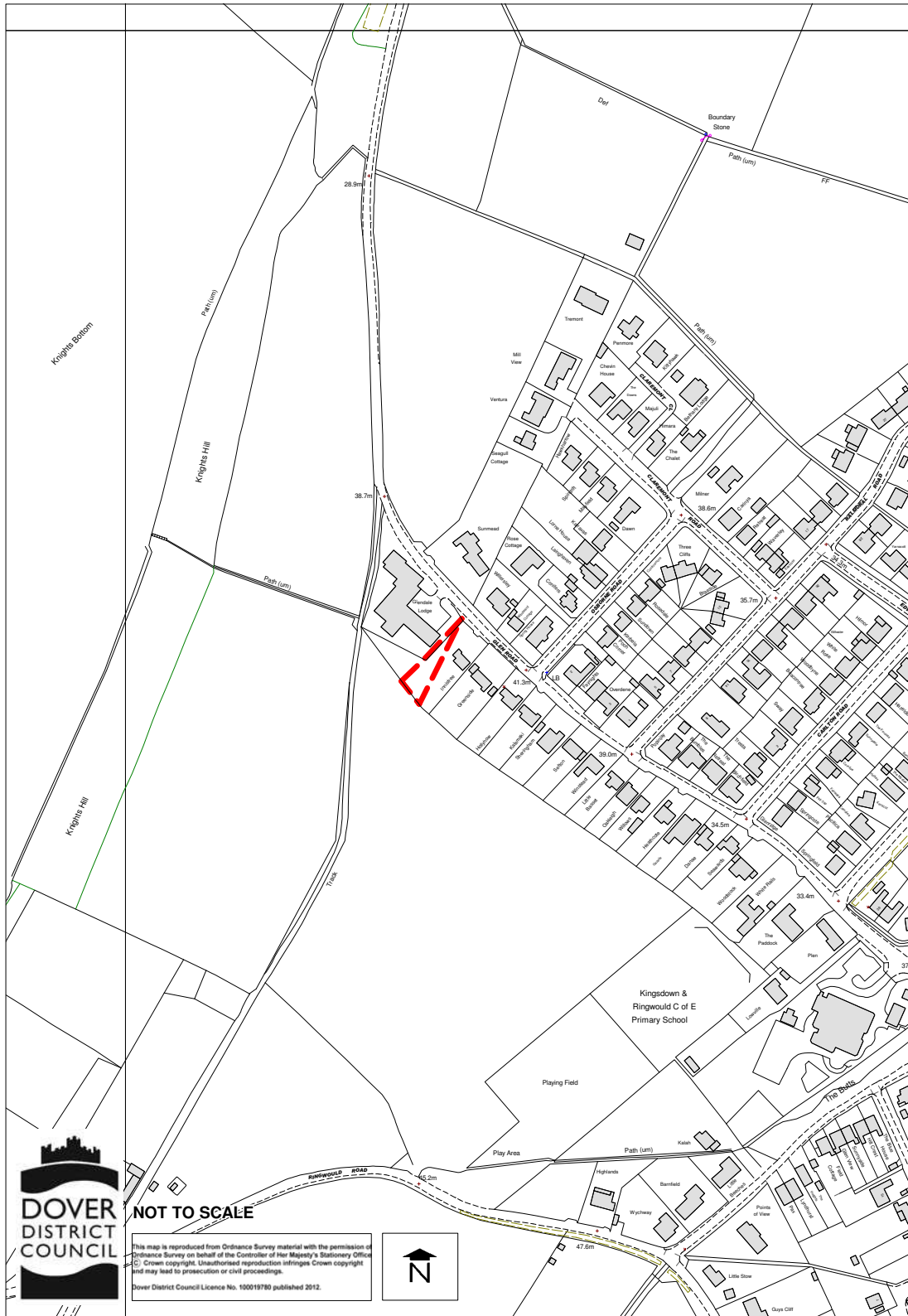
Map 3.49 Land at Homeside, Eythorne



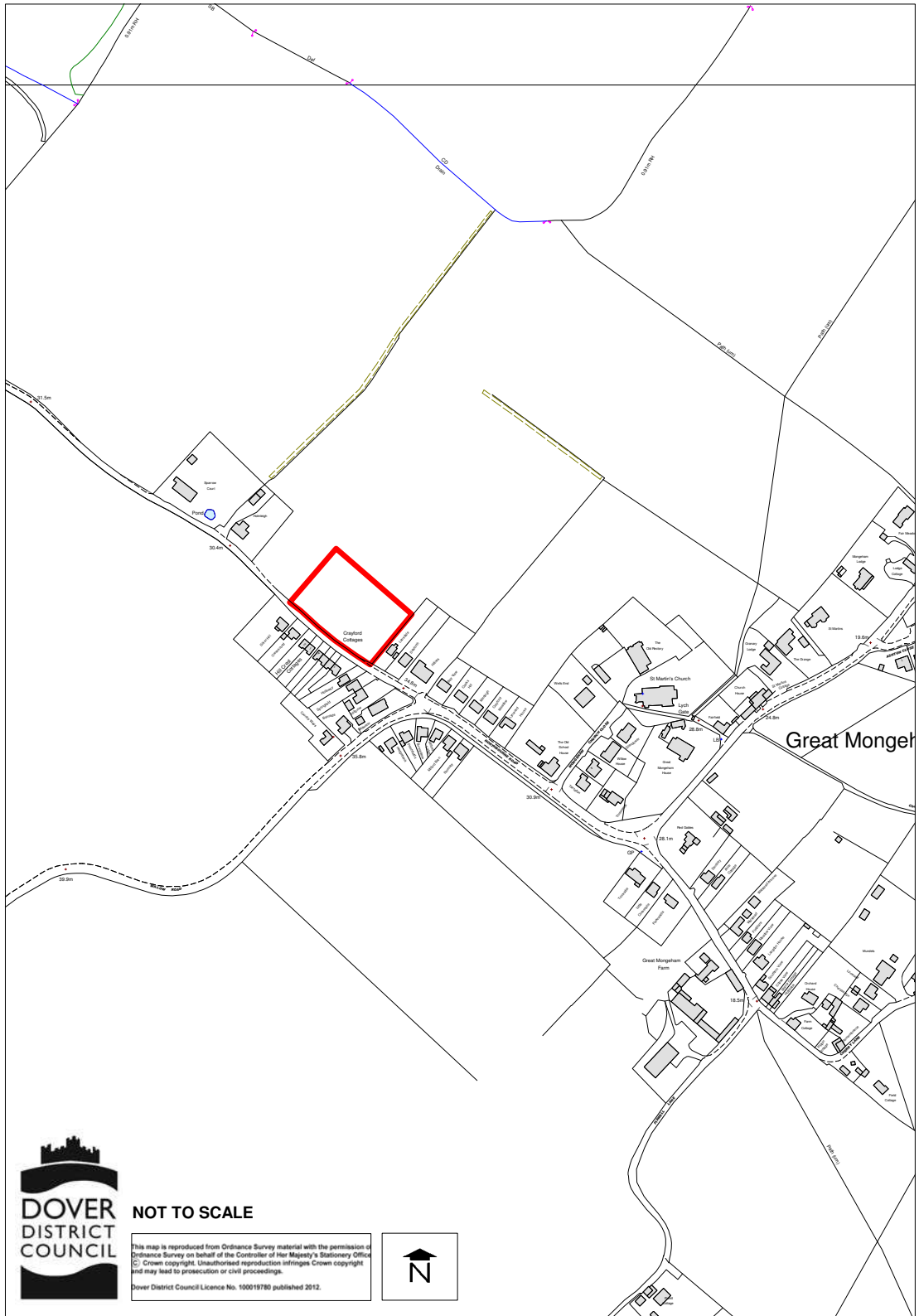
Map 3.50 Land between the village hall and The Bothy, Upper Street, Kingsdown



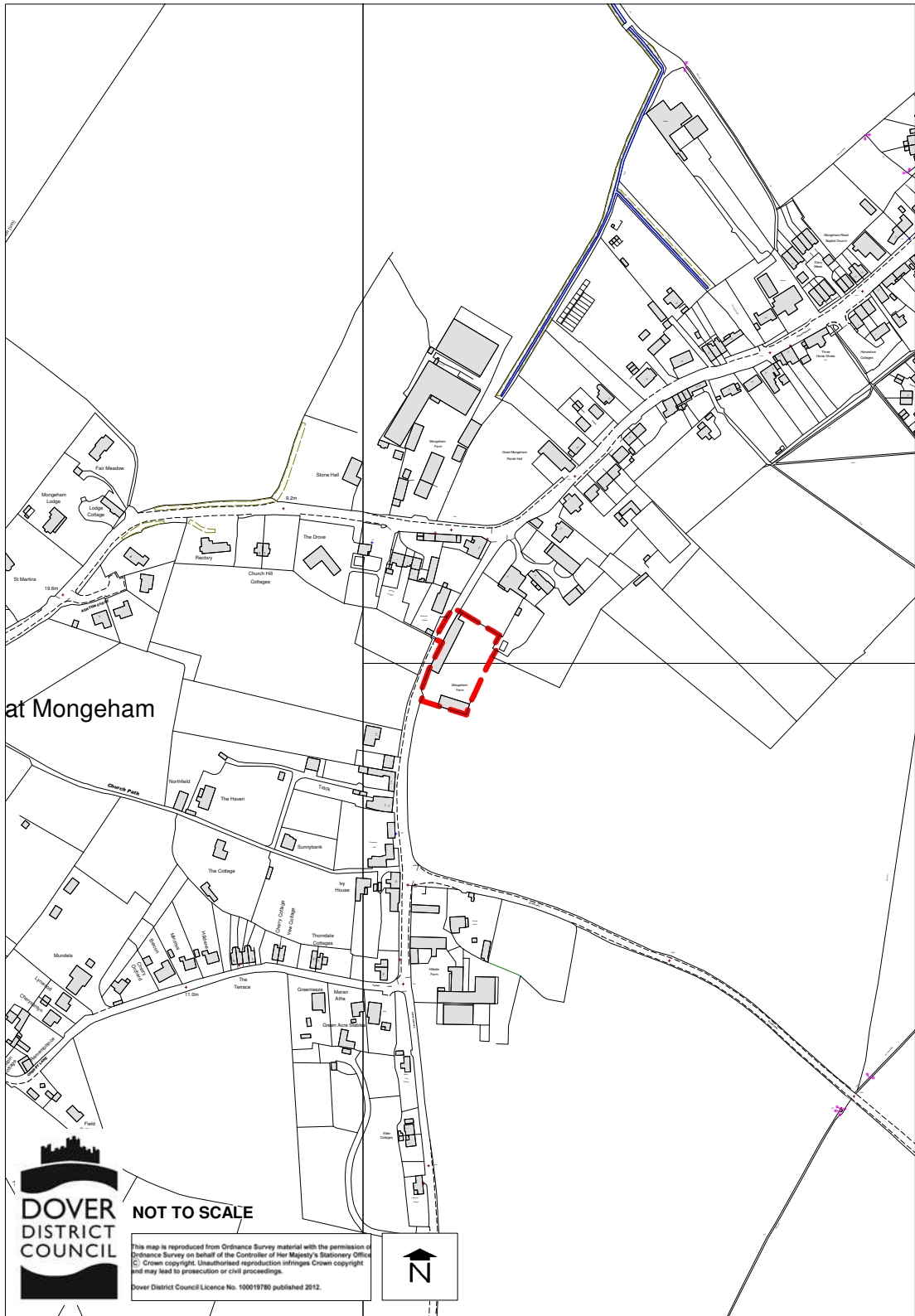
Map 3.51 Garage site, Kingsdown Road, Kingsdown



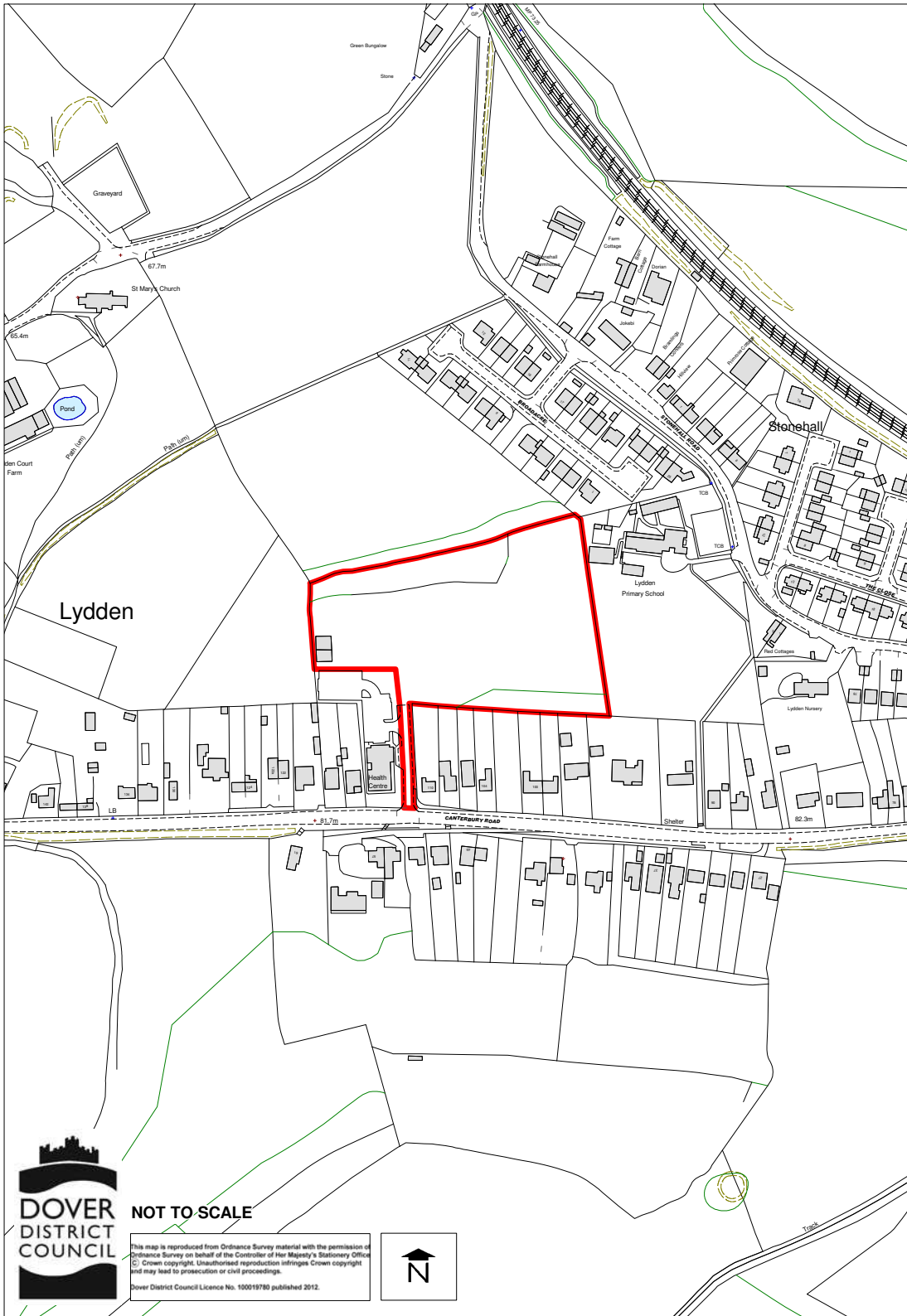
Map 3.52 Land between Innisfree and Glen Lodge, Glen Road, Kingsdown



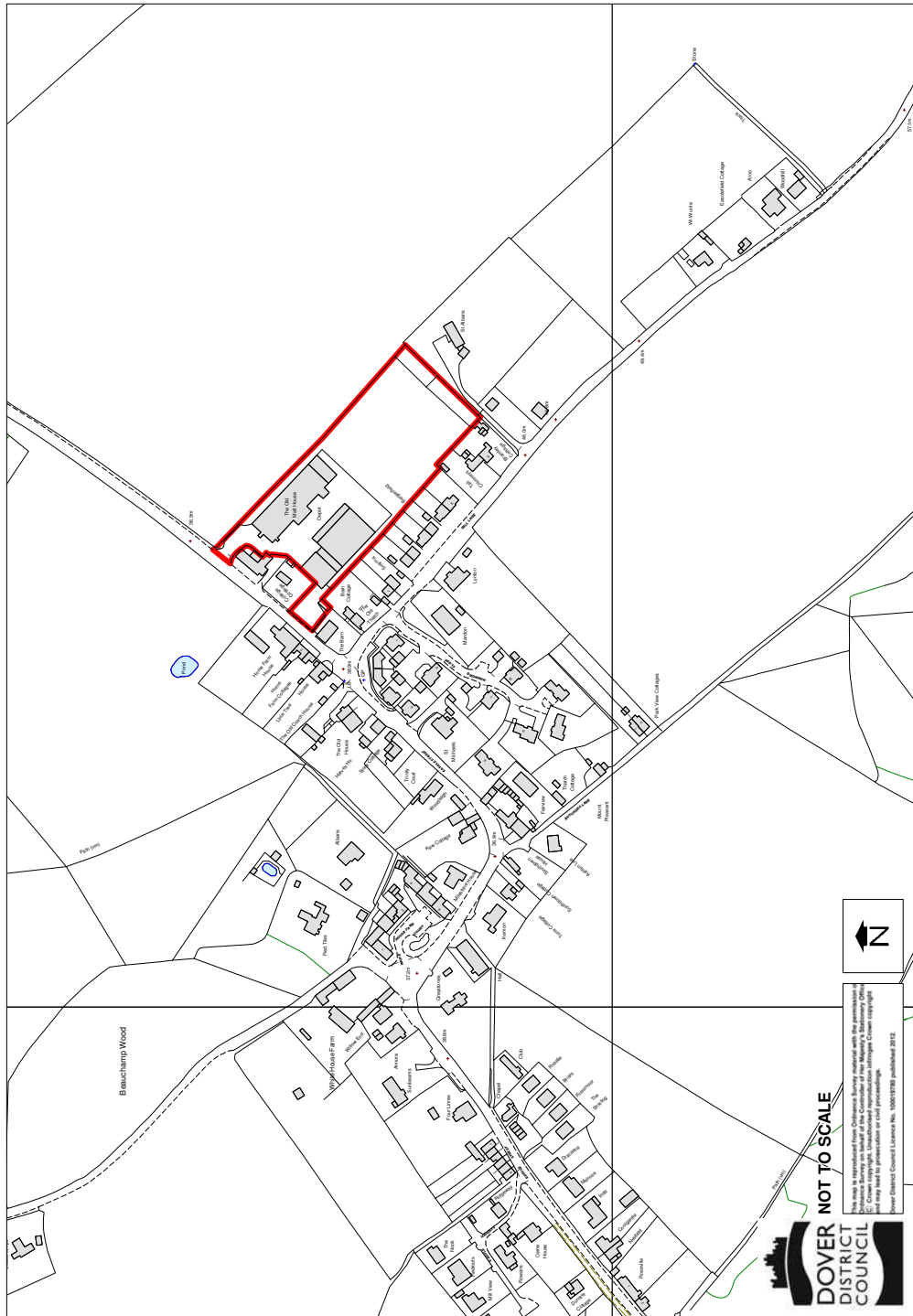
Map 3.53 Land at Northbourne Road, Great Mongeham



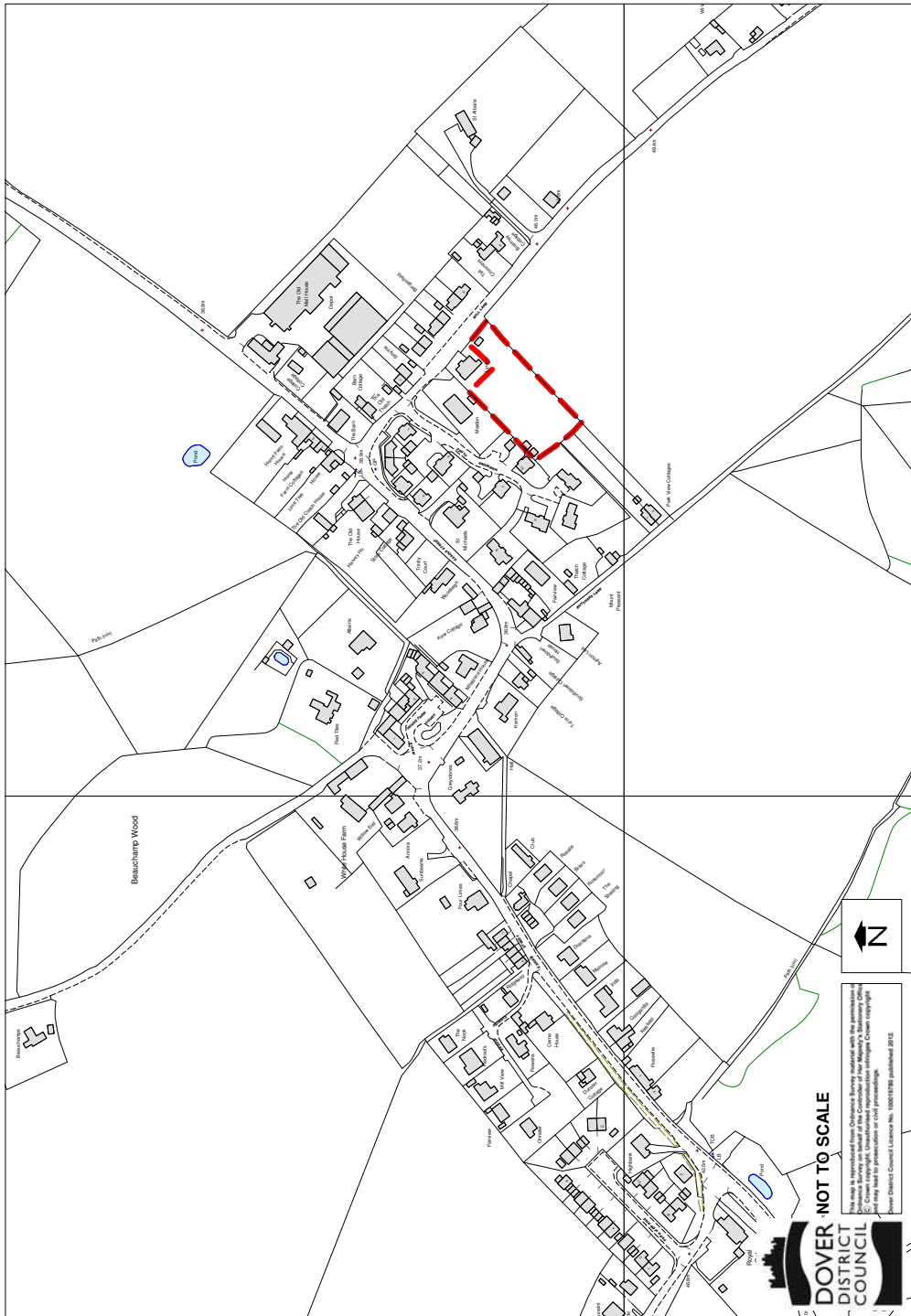
Map 3.55 Mongeham Farm, Mongeham Road, Great Mongeham



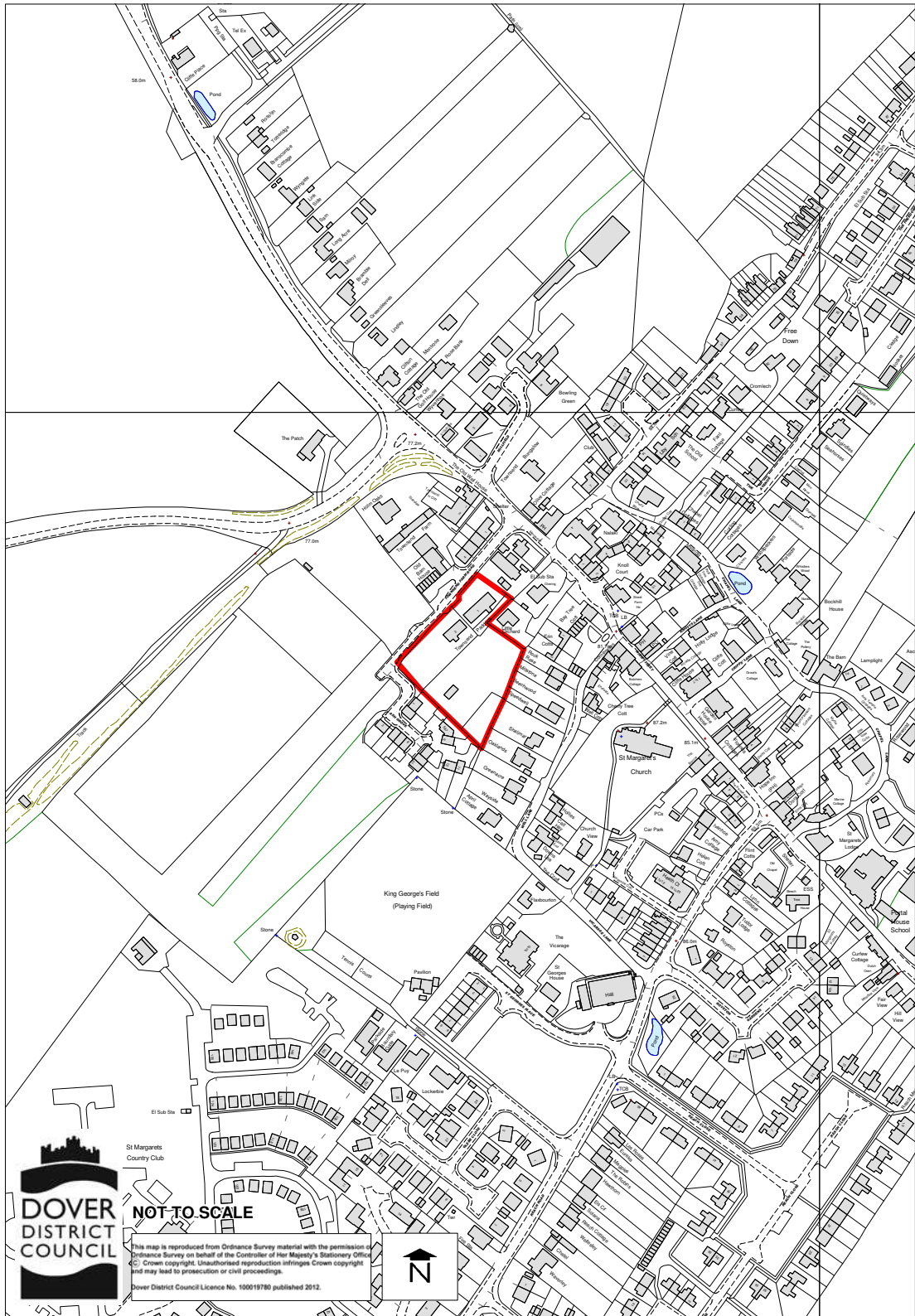
Map 3.56 Land at Canterbury Road, Lydden



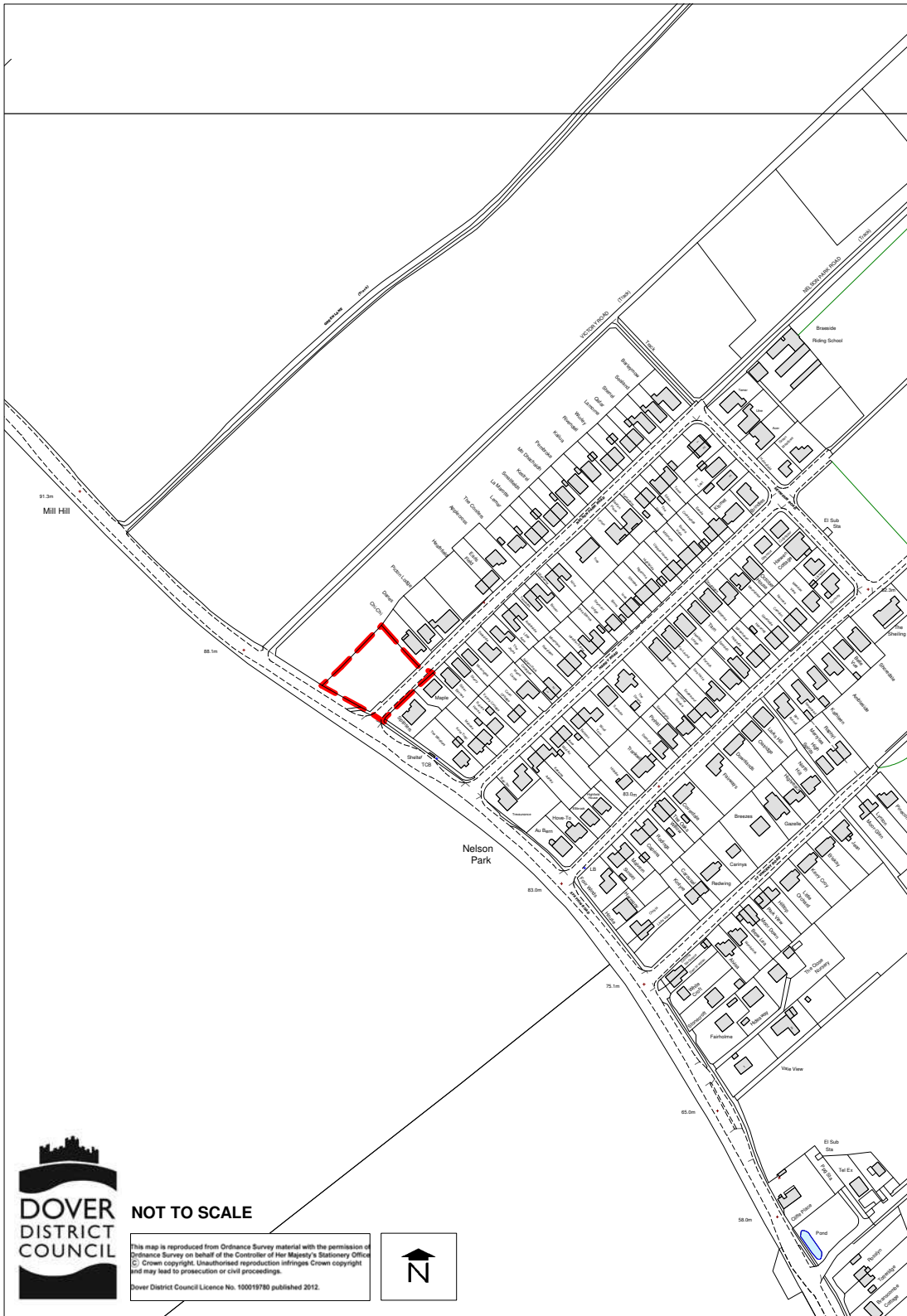
Map 3.57 Prima Windows, Easole Street, Nonington



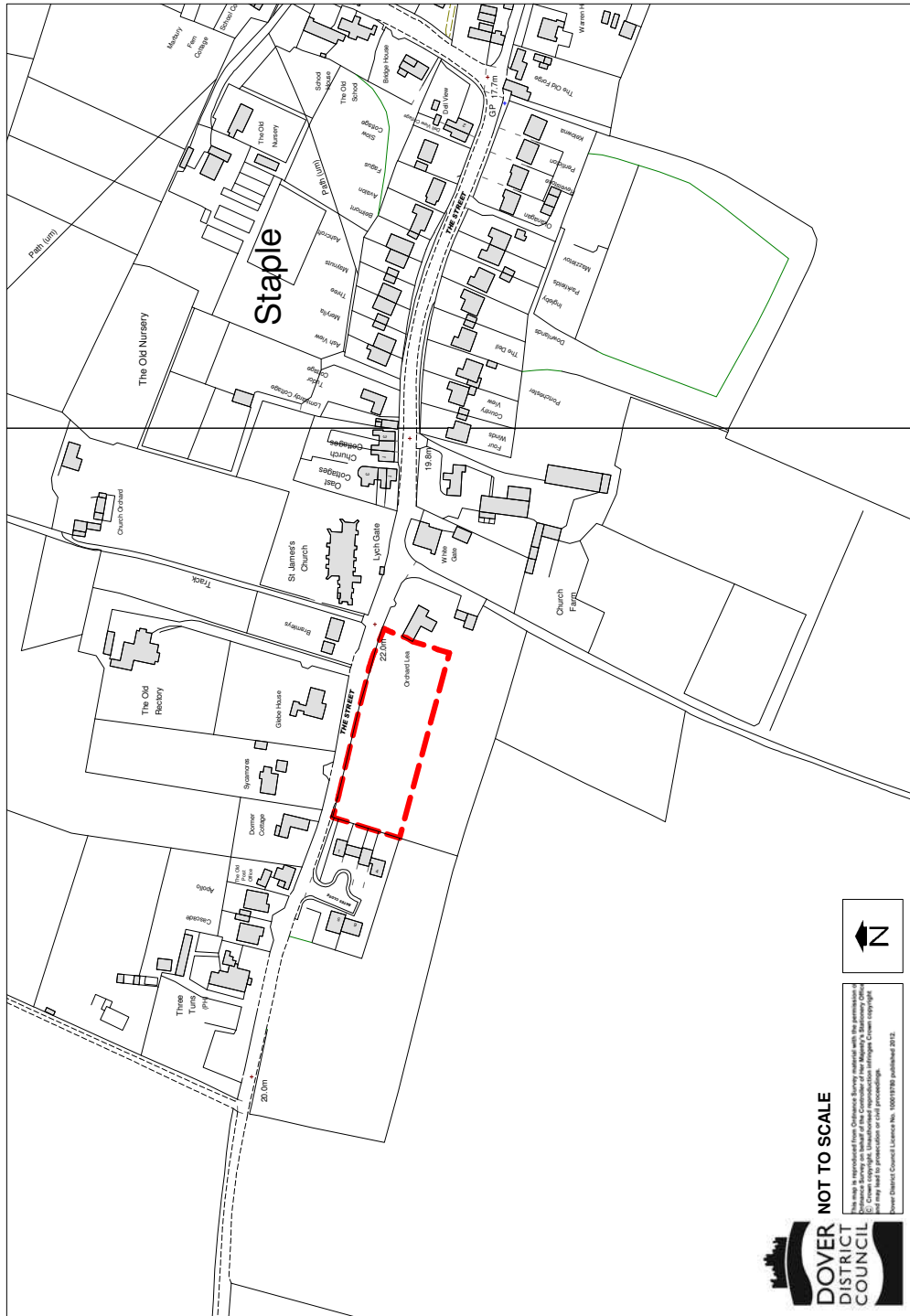
Map 3.58 Land at Lynton, Mill Lane, Nonington



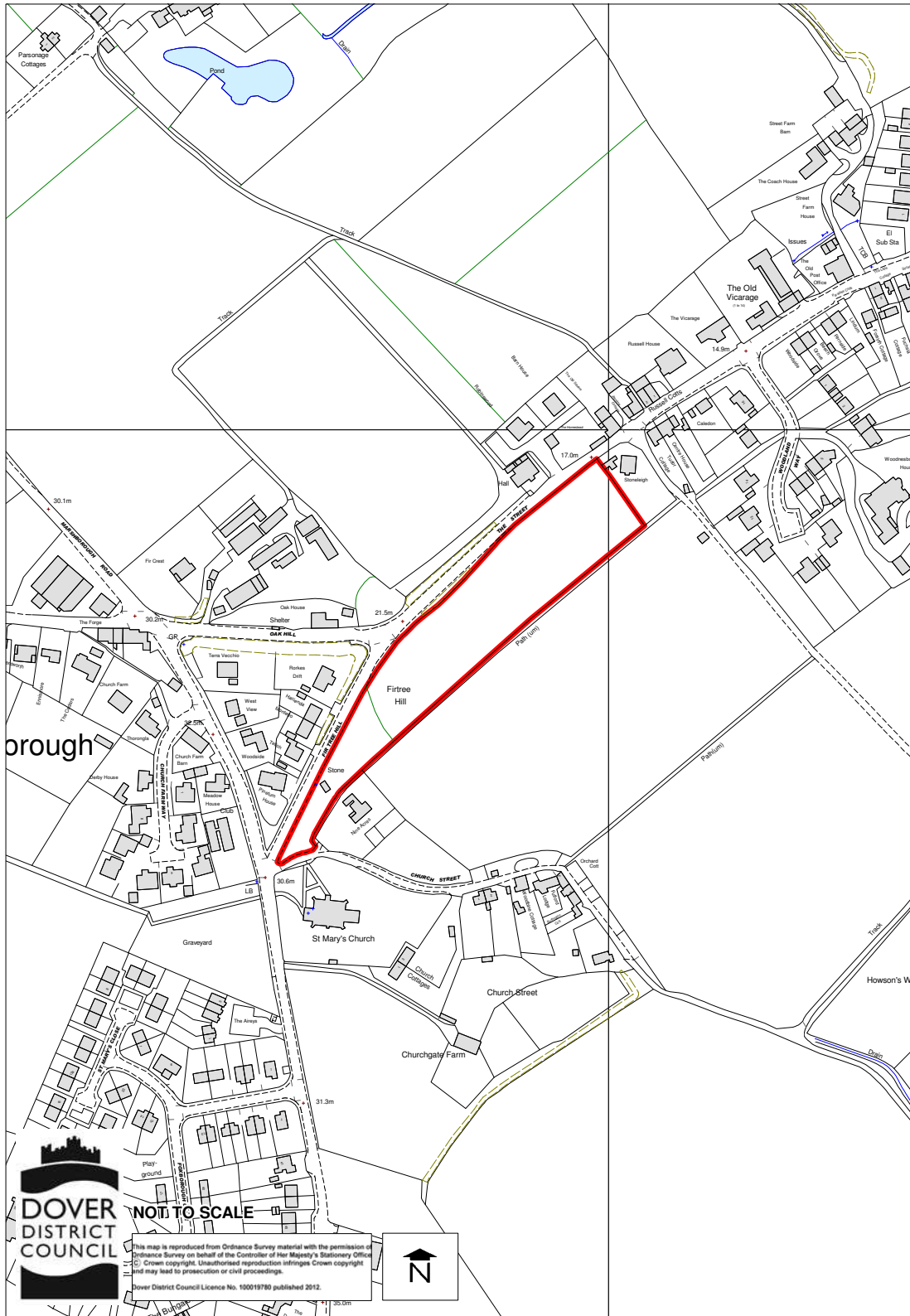
Map 3.59 The Paddock, Townsend Farm Road, St Margaret's at Cliffe



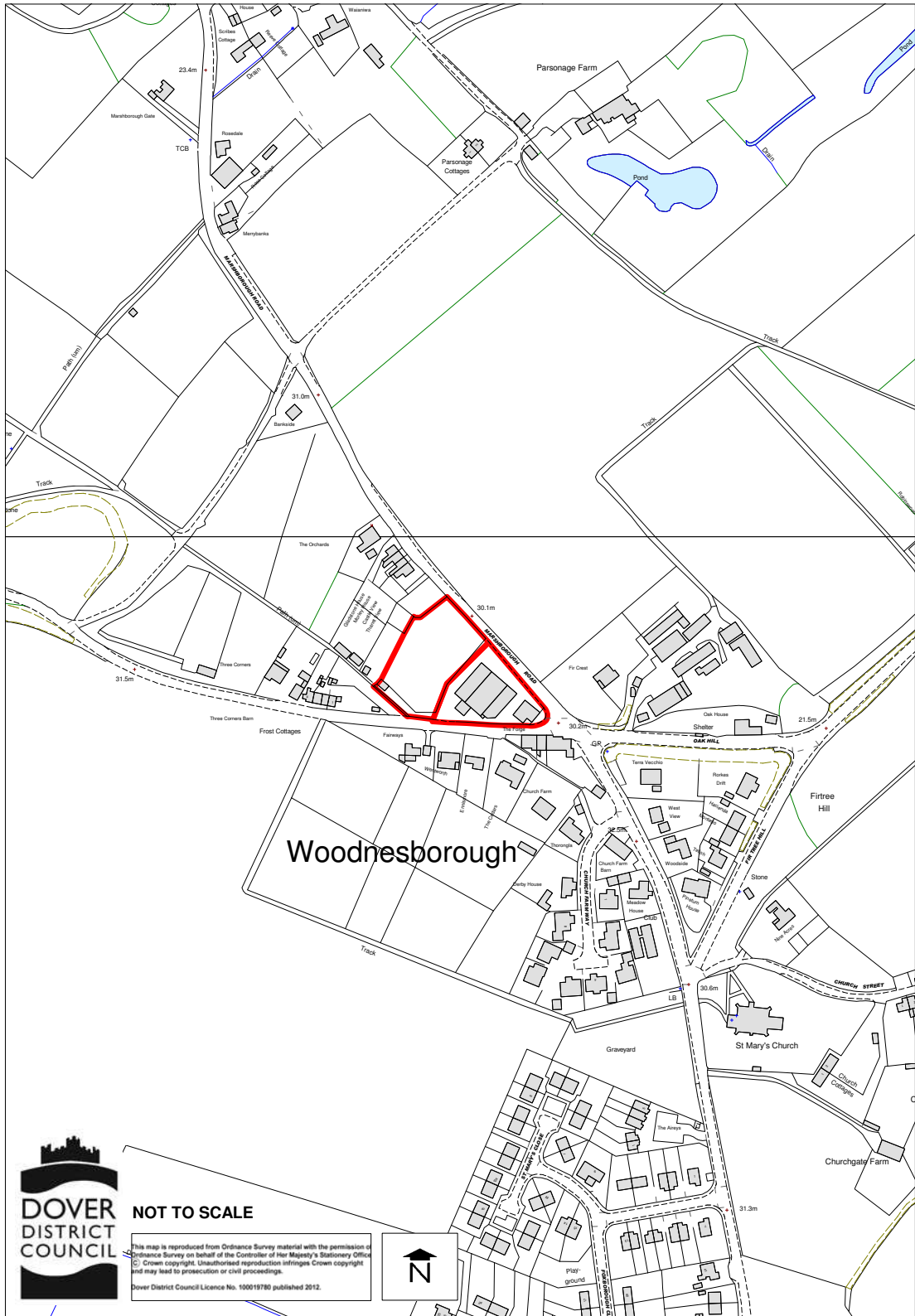
Map 3.60 Land at the junction of Station Road and Nelson Park Road, St Margaret's at Cliffe



Map 3.61 Land to the west of Orchard Lea, The Street, Staple



Map 3.62 Land between Stoneleigh and Nine Acres, The Street, Woodnesborough



Map 3.63 Land at Laslett's Yard and adjacent land, Woodnesborough

Appendix 4 Open Space Amendments

4.1 Policy DM 25 in the Core Strategy protects open space from alternative uses unless there is no quantitative or qualitative loss to the open space network, or the use is ancillary to the open space. Most of the open spaces in the district are identified on the Local Development Framework Proposals Map, but the policy applies to any open space even if it is not identified on the map. Designated open space includes publicly accessible facilities such as parks, outdoor sports facilities, children's play areas, allotments and operational cemeteries, as well as a smaller number of non-publicly accessible sites. School playing fields make up the majority of the non-publicly accessible protected open spaces, but there are also examples of protected undeveloped land with potential amenity value in private ownership.

4.2 The current version of the Proposals Map was adopted in February 2010, at the time the Core Strategy was adopted. This replaced the proposals map that was produced in 2002 with the Local Plan. A consultation was carried out in 2008 on the Core Strategy, Land Allocations and open space amendments. The Core Strategy was adopted in 2010 and results for the consultation on the Land Allocations and Open Space are now being dealt with. Most of the proposed changes were factual updates, and most of them were additions:

Additions

- School grounds where that had previously been omitted in error - map numbers 4.7, 4.8, 4.10, 4.15, 4.22, 4.24, 4.25, 4.29, 4.37 and 4.39.
- Accessible open space facilities that had previously been omitted in error
 - amenity green space - Whitfield 4.1 & 4.2, Aycliffe 4.3, Western Heights 4.4, Burgoyne Heights 4.10, Deal 4.12, Walmer 4.13, Sandwich 4.18, Elvington 4.27 and West Langdon 4.32
 - formal park – Russell Gardens 4.39
 - childrens play space - Whitfield 4.2, Ringwould 4.38, River 4.39
 - closed churchyard - St Peters in Aylesham 4.22
 - allotments - East Langdon 4.31 and Preston 4.37
 - sports facilities – Kearsney Camping Ground (contains a rugby pitch) 4.39 and St Margarets Bowling Green 4.41
- Amendments to boundaries, that had been drawn incorrectly - 4.6, 4.12, 4.14, 4.17, 4.19, 4.20, 4.21, 4.23, 4.33, 4.35, 4.37, 4.38 and 4.40
- Delineation of new open space facilities - public gardens on Barwick Road 4.12 and Fowlmead Country Park 4.23
- Identification of a private closed cemetery on North Barrack Road 4.12

Deletions

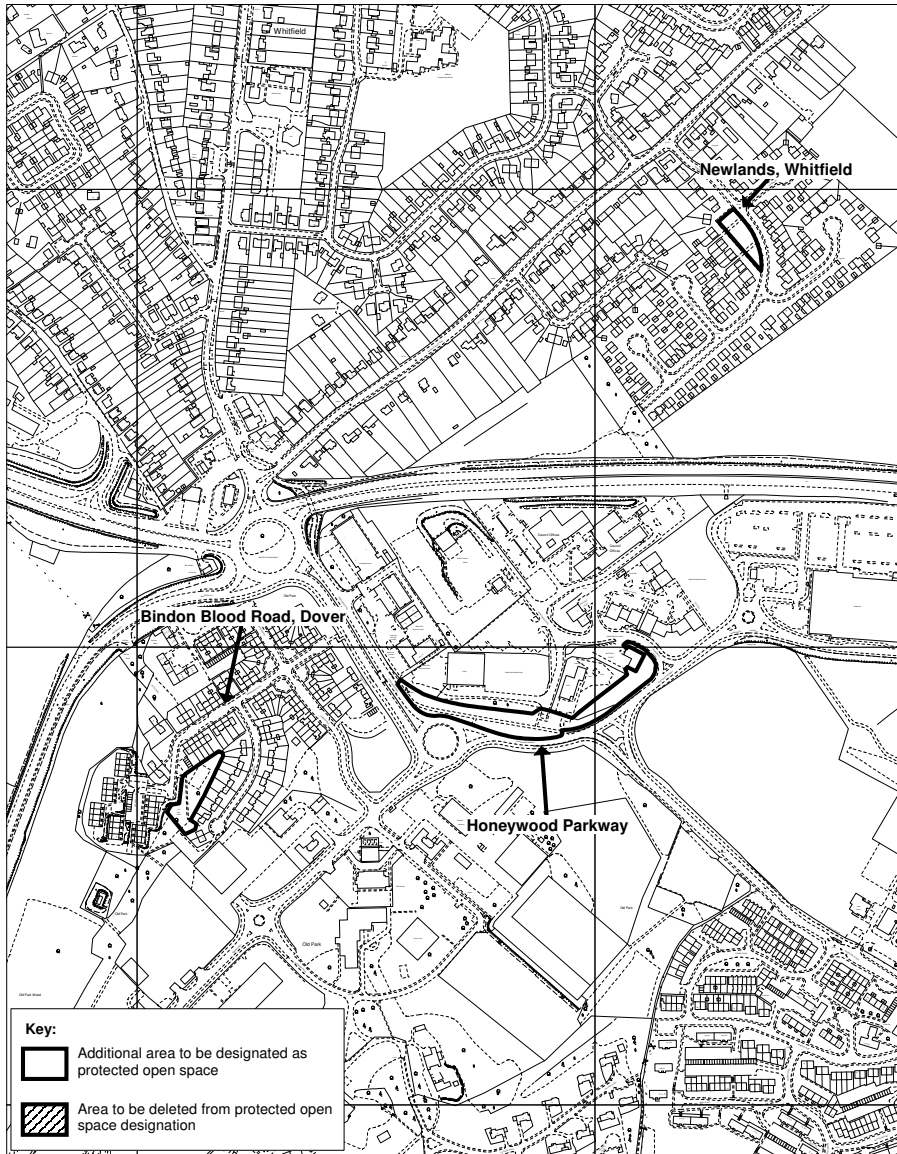
- Removal of buildings within protected sites – at schools 4.9, 4.26, 4.31 and 4.40 and at the Aylesham and Colliery Welfare sports ground 4.22
- Depiction of fact – where planning permission was granted on appeal 4.17, or was granted to allow creation of local employment opportunities 4.22
- Implementation of adopted open space policies - play equipment was removed from the non-strategic play area at Gilford Avenue 4.1
- Improving consistency – beaches are linear features, cannot be mapped accurately as areas and are not under threat of development so the only section of beach previously designated as open space 4.13 has been removed
- Amendments to boundaries, that had been drawn incorrectly - 4.11 and 4.30
- Commons – are protected by the Commons Act (2006), therefore protection on the Proposals Map would be superfluous 4.36 and 4.34
- Removal of land that is has no amenity value, visual benefit and no potential for improvement – 4.22 and 4.47



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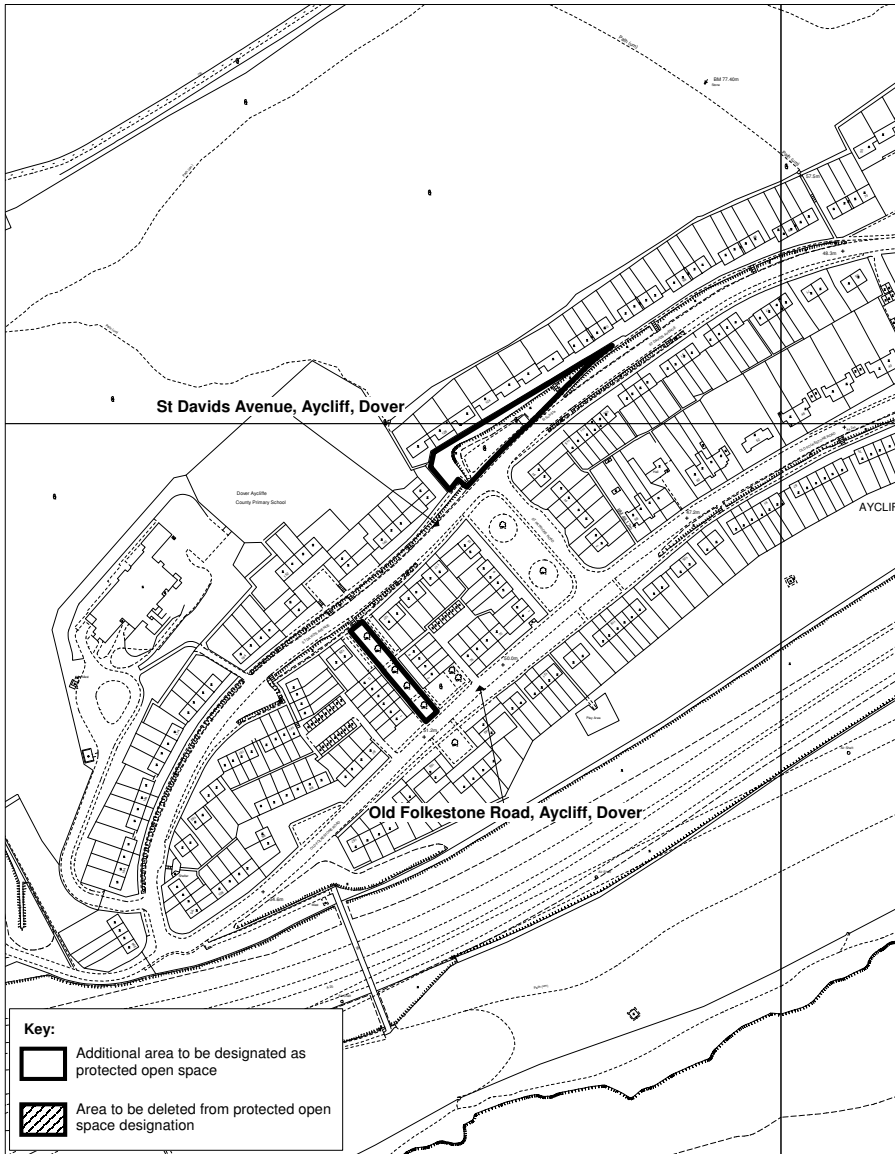
Map 4.1 Whitfield, Dover



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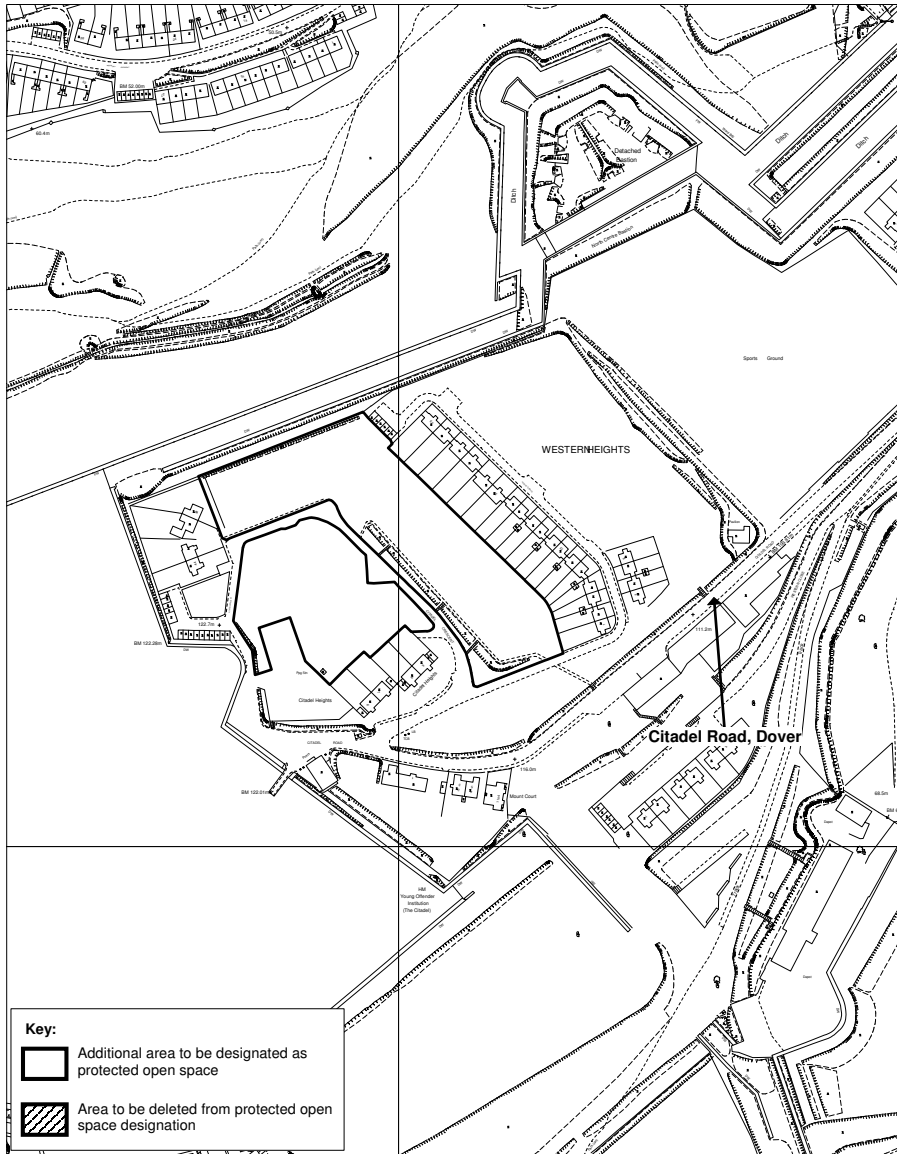
Map 4.2 Whitfield, Dover



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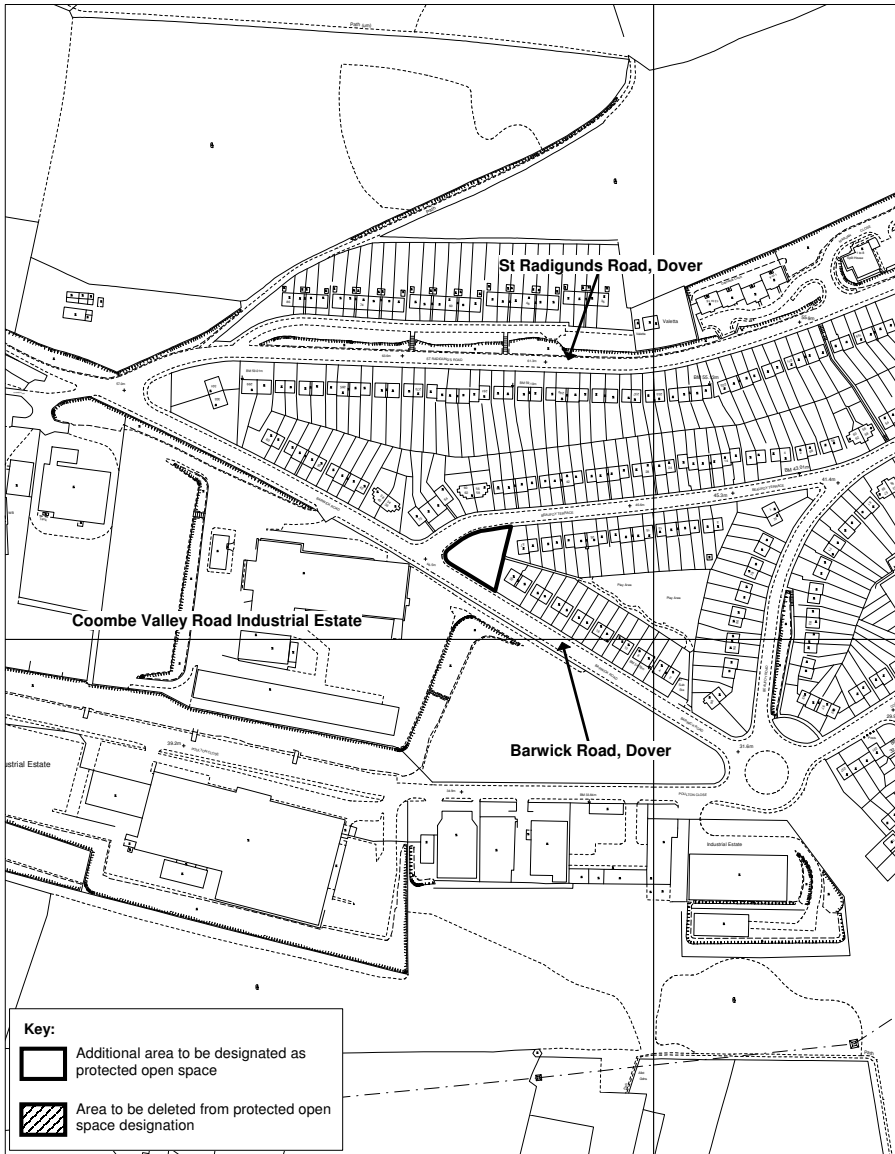
Map 4.3 Aycliff, Dover



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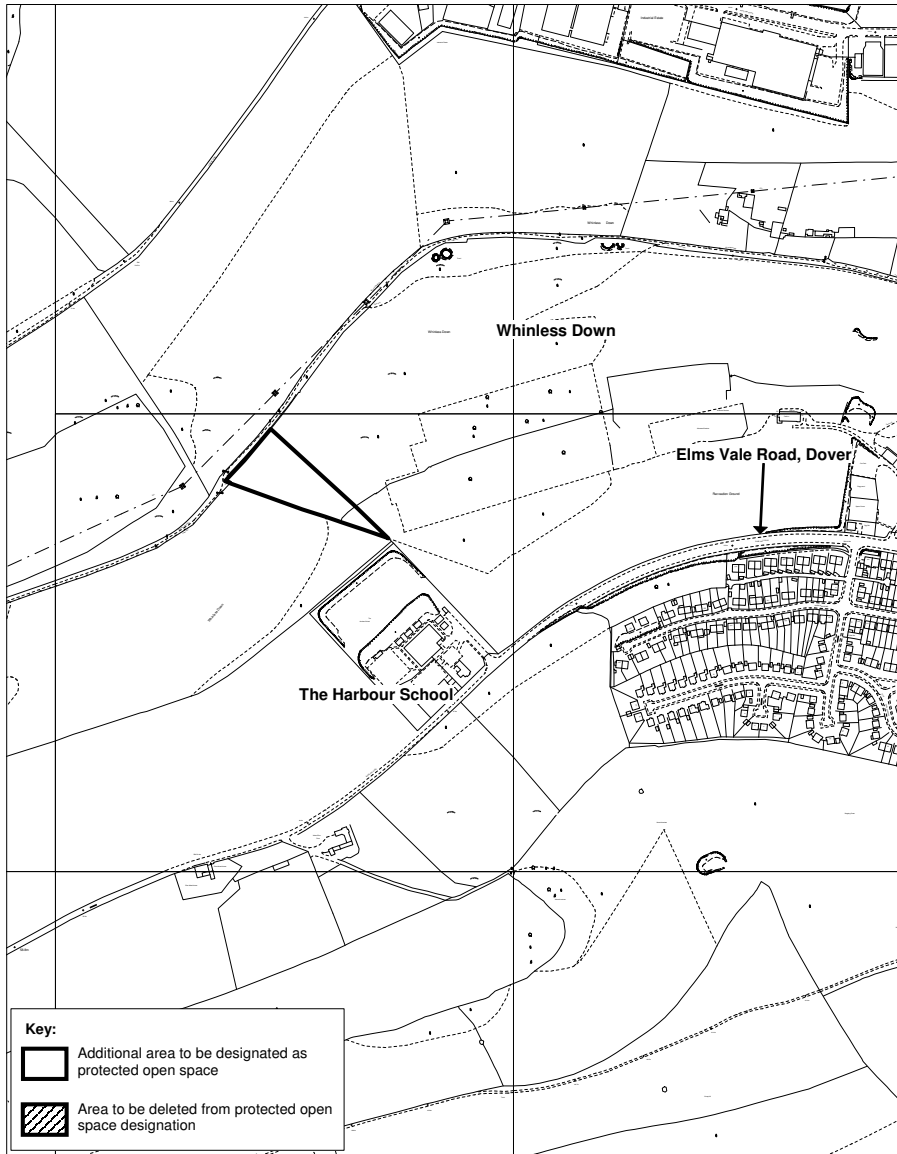
Map 4.4 Western Heights, Dover



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Map 4.5 Coombe Valley Area, Dover



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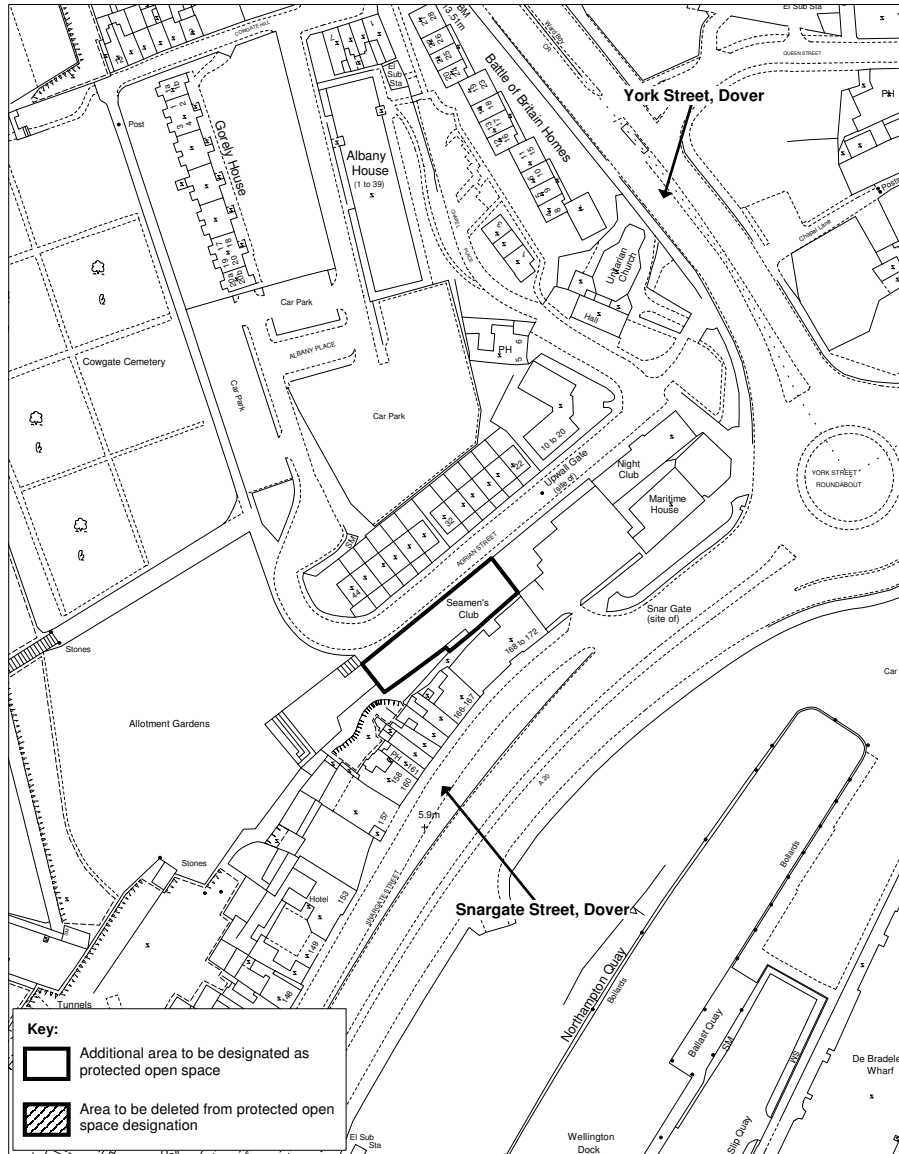
Map 4.6 Whinless Down, Dover



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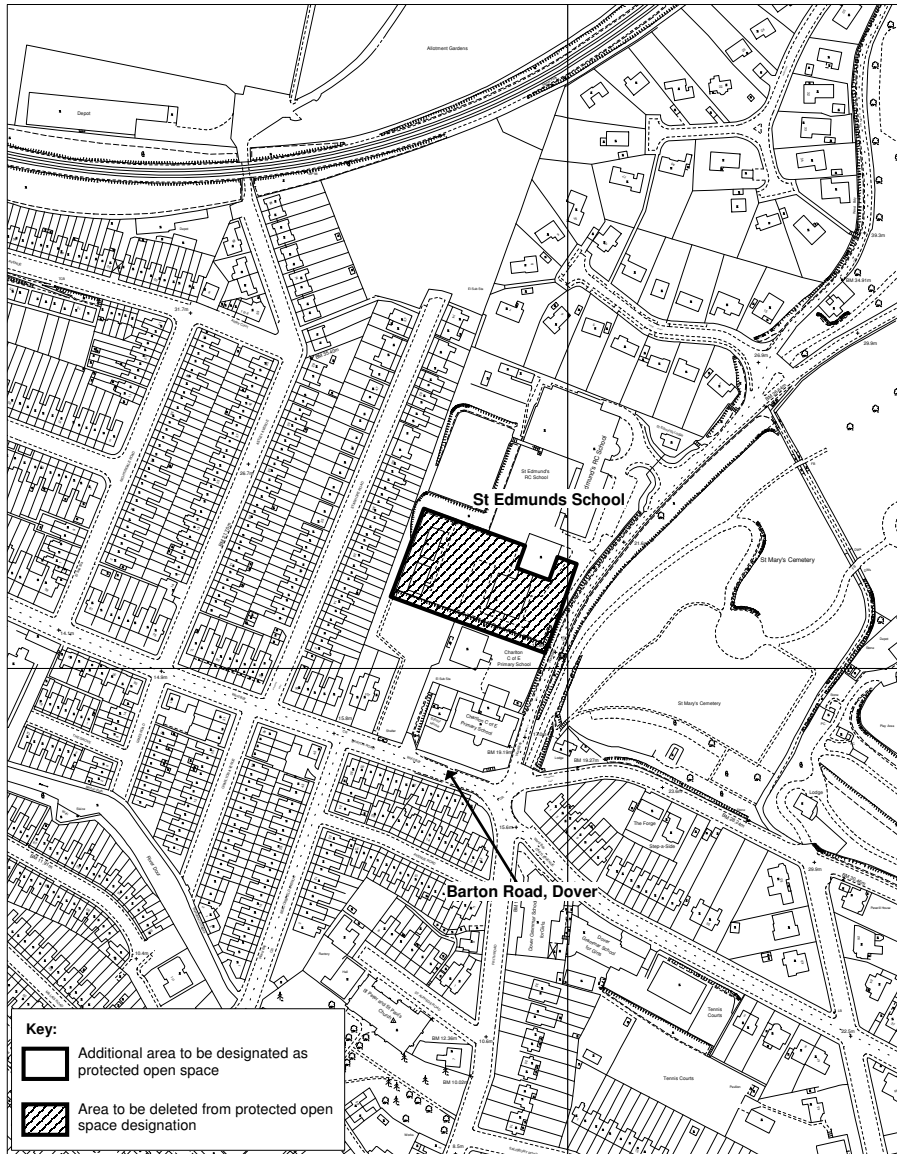
Map 4.7 Area around Dover College



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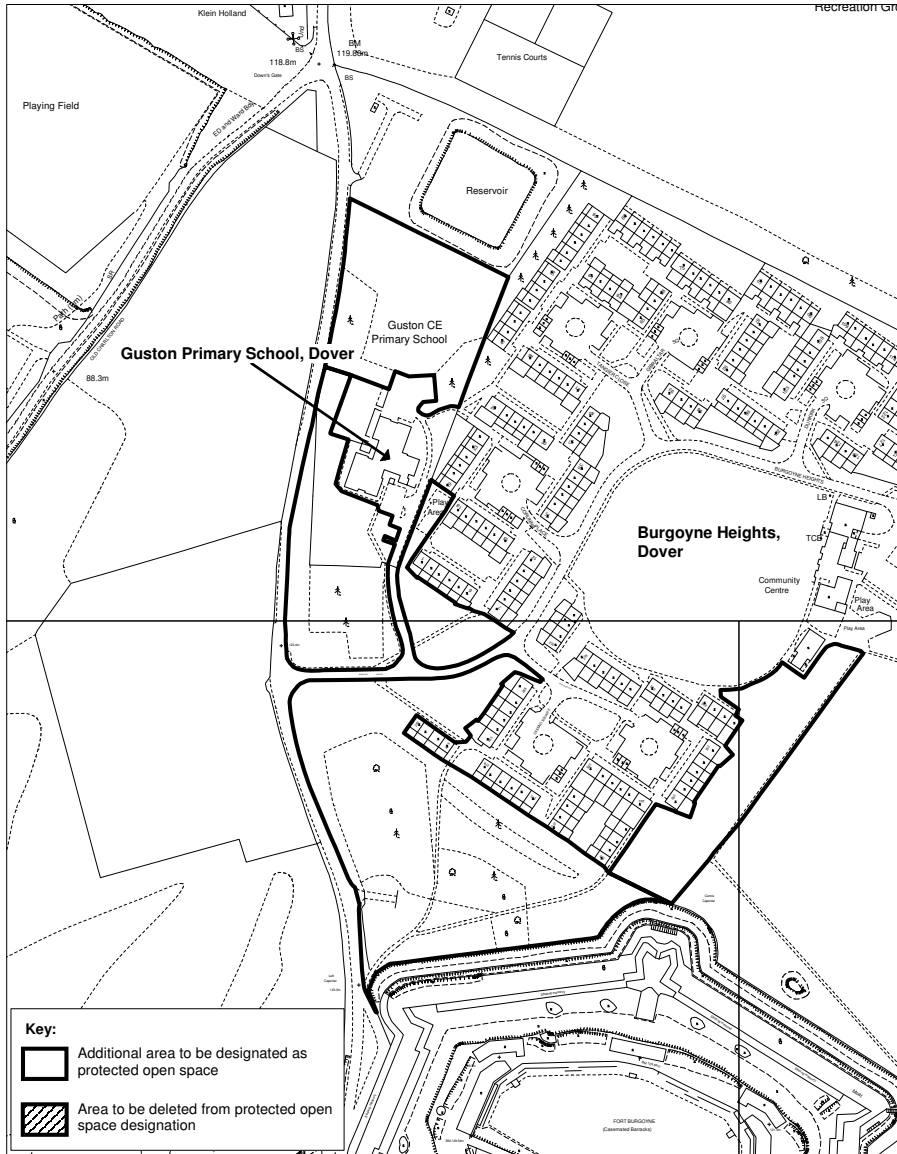
Map 4.8 Adrian Street, Dover



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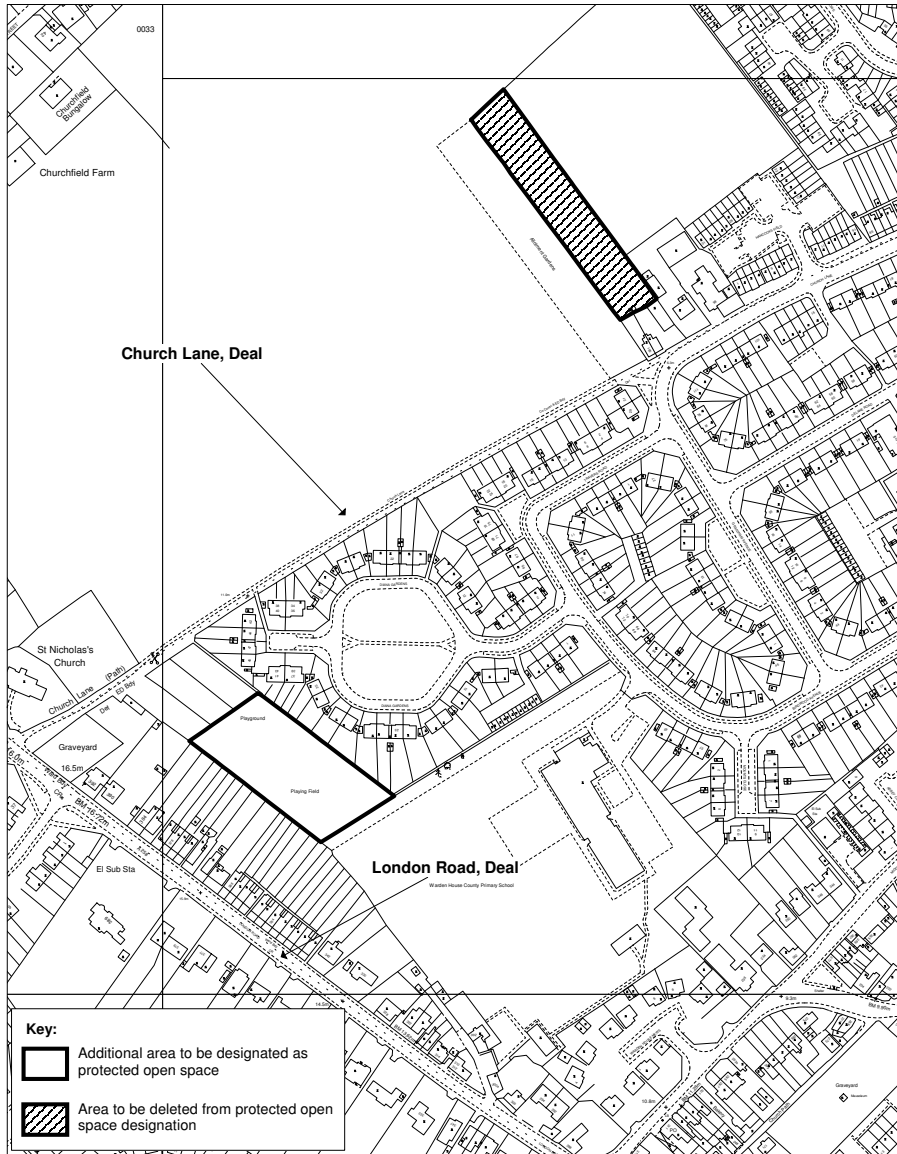
Map 4.9 St Edmund's School, Dover



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Map 4.10 Burgoyne Heights, Dover



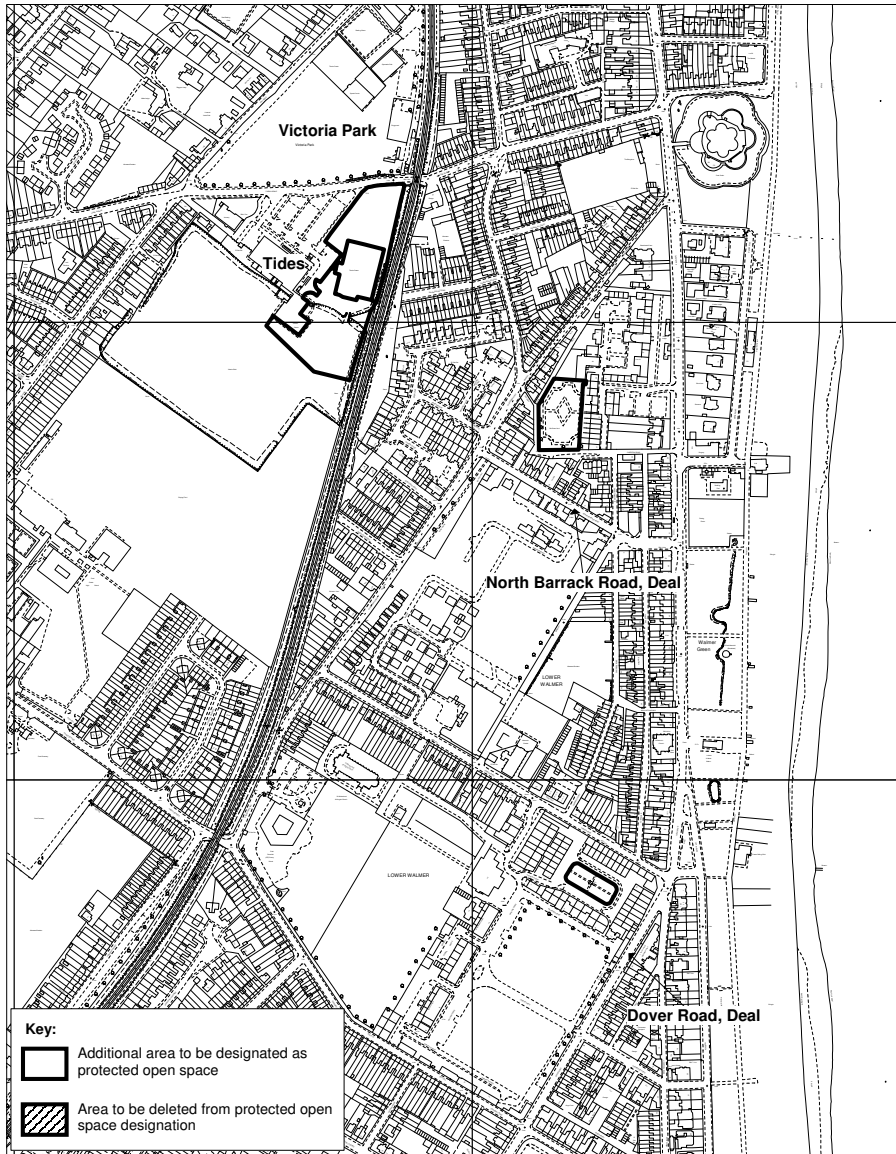
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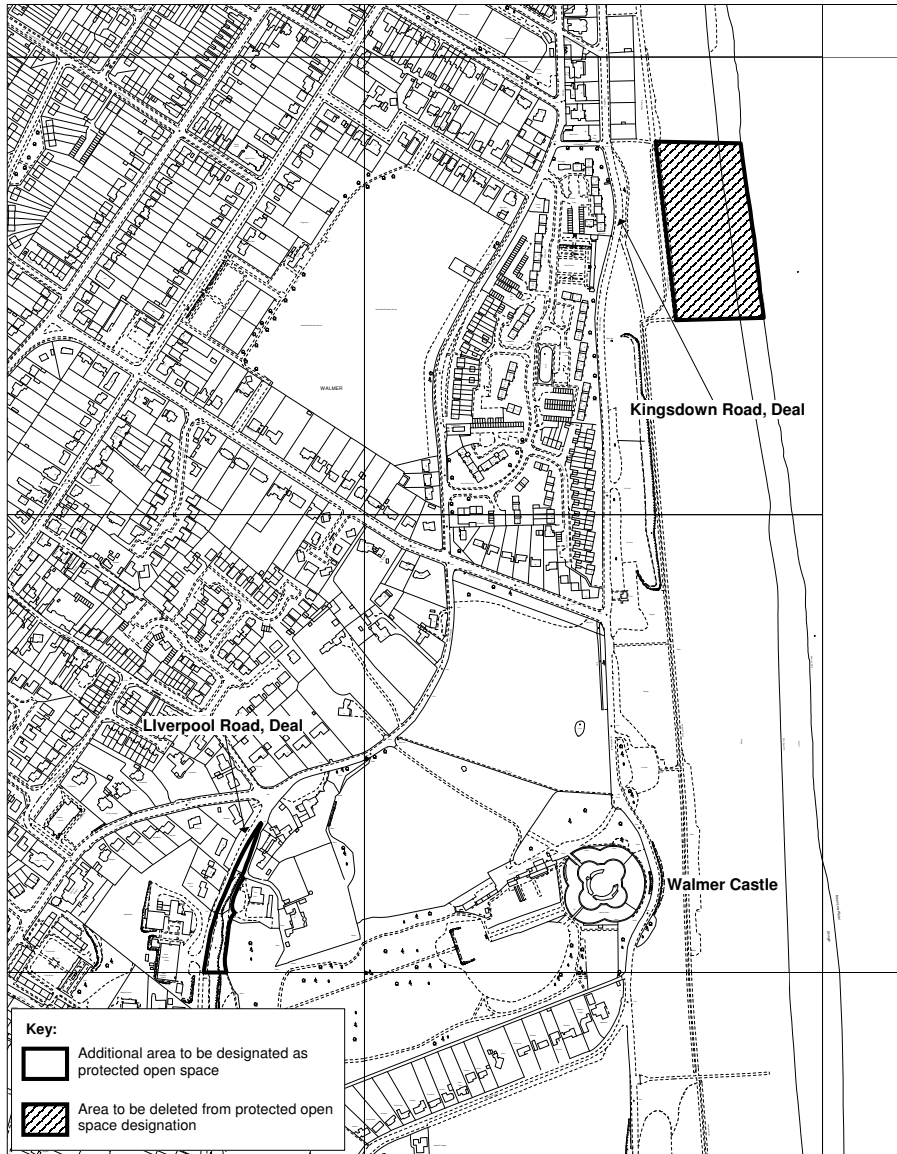
Map 4.11 Vicinity of Church Lane, Deal



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Map 4.12 Barrack Sites and Tides Leisure Centre, Deal



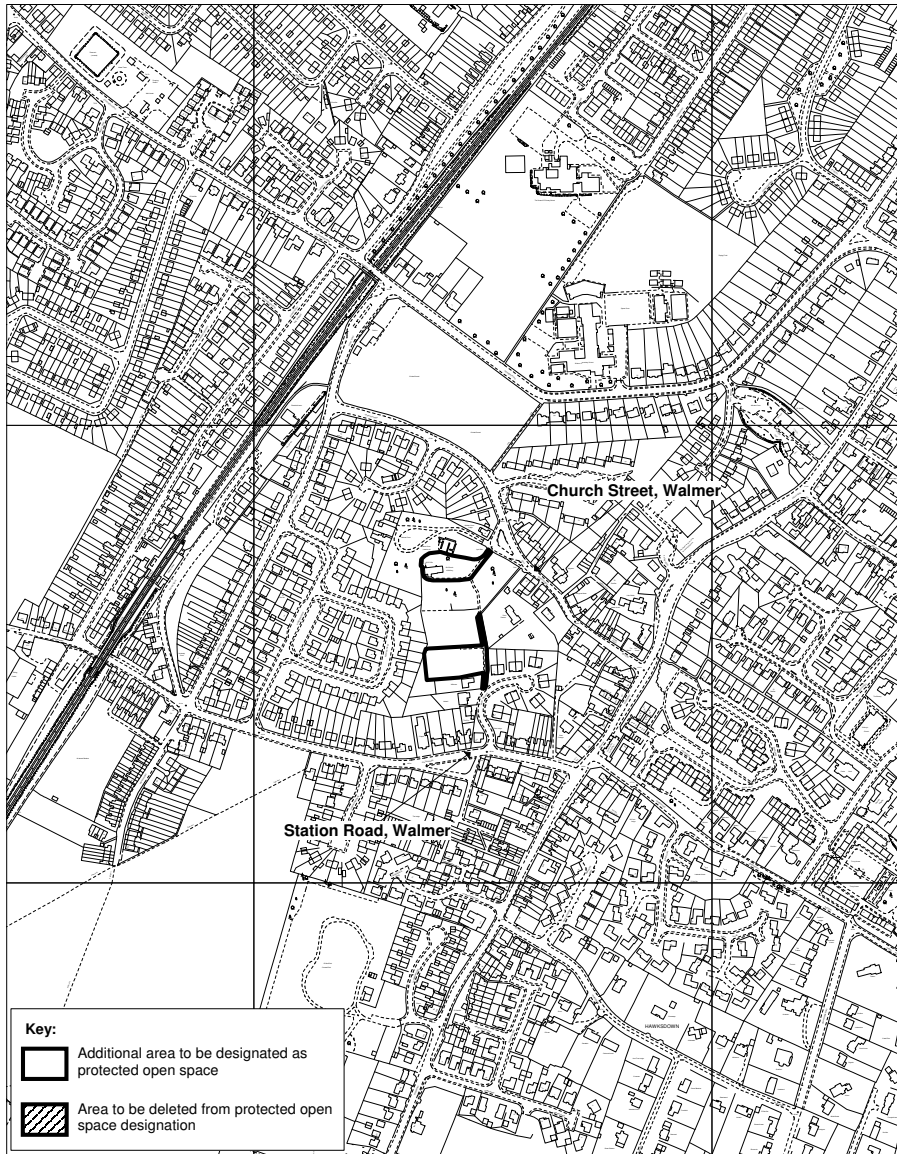
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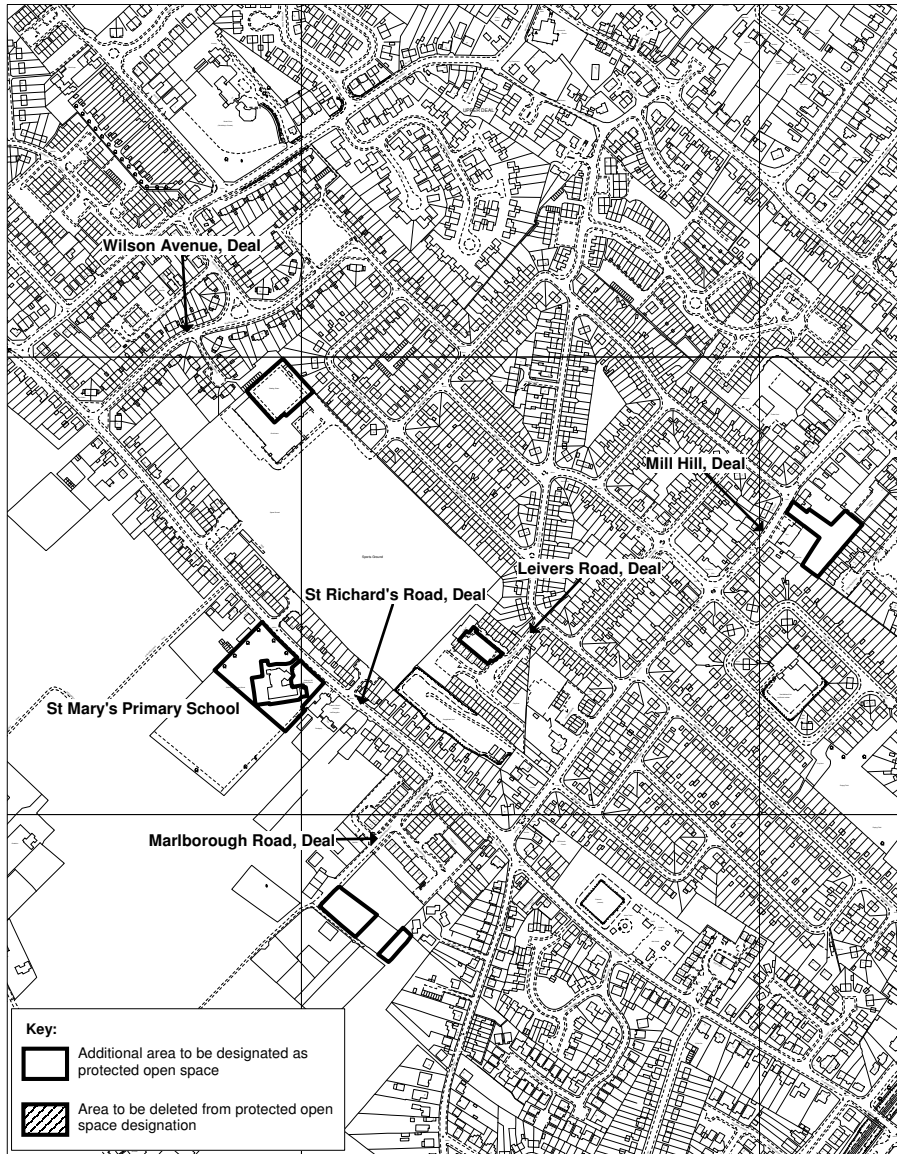
Map 4.13 Near Walmer Castle, Deal



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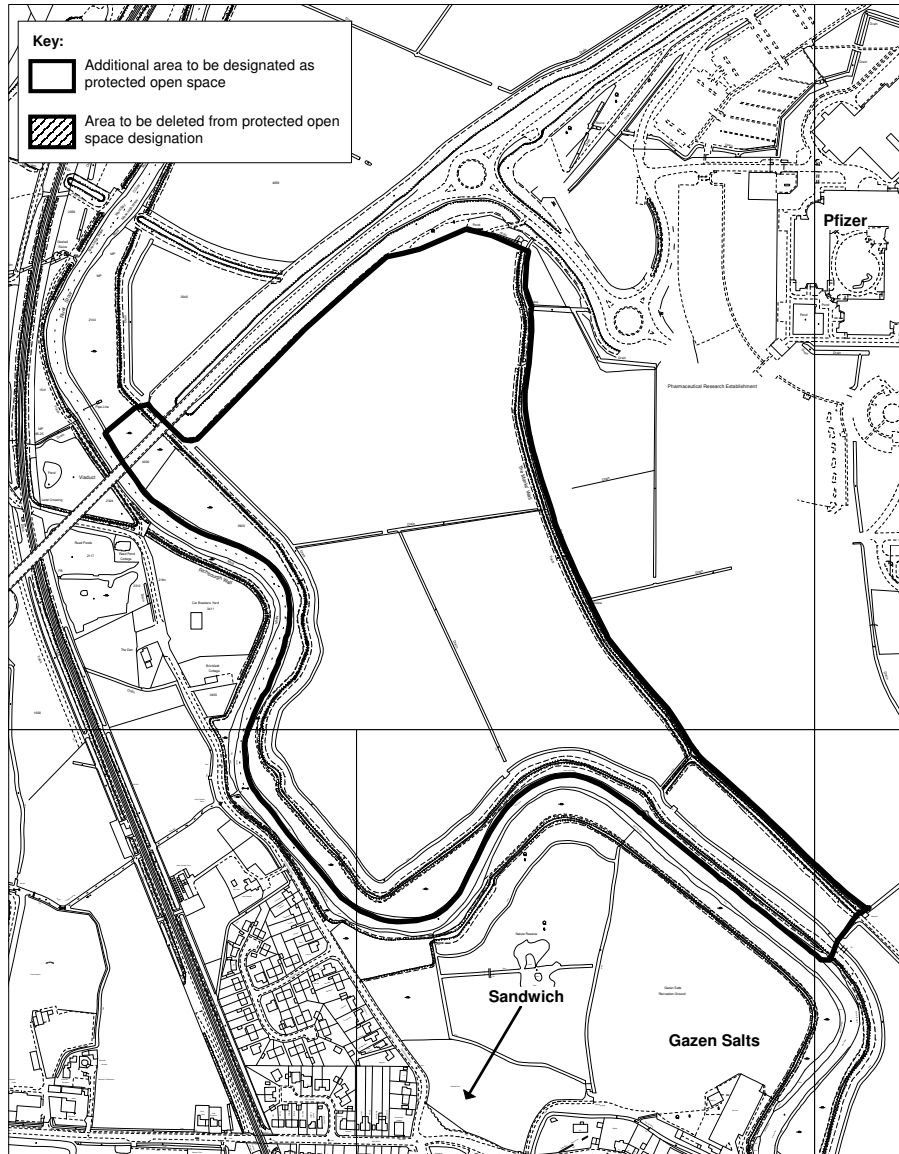
Map 4.14 Church Street, Walmer



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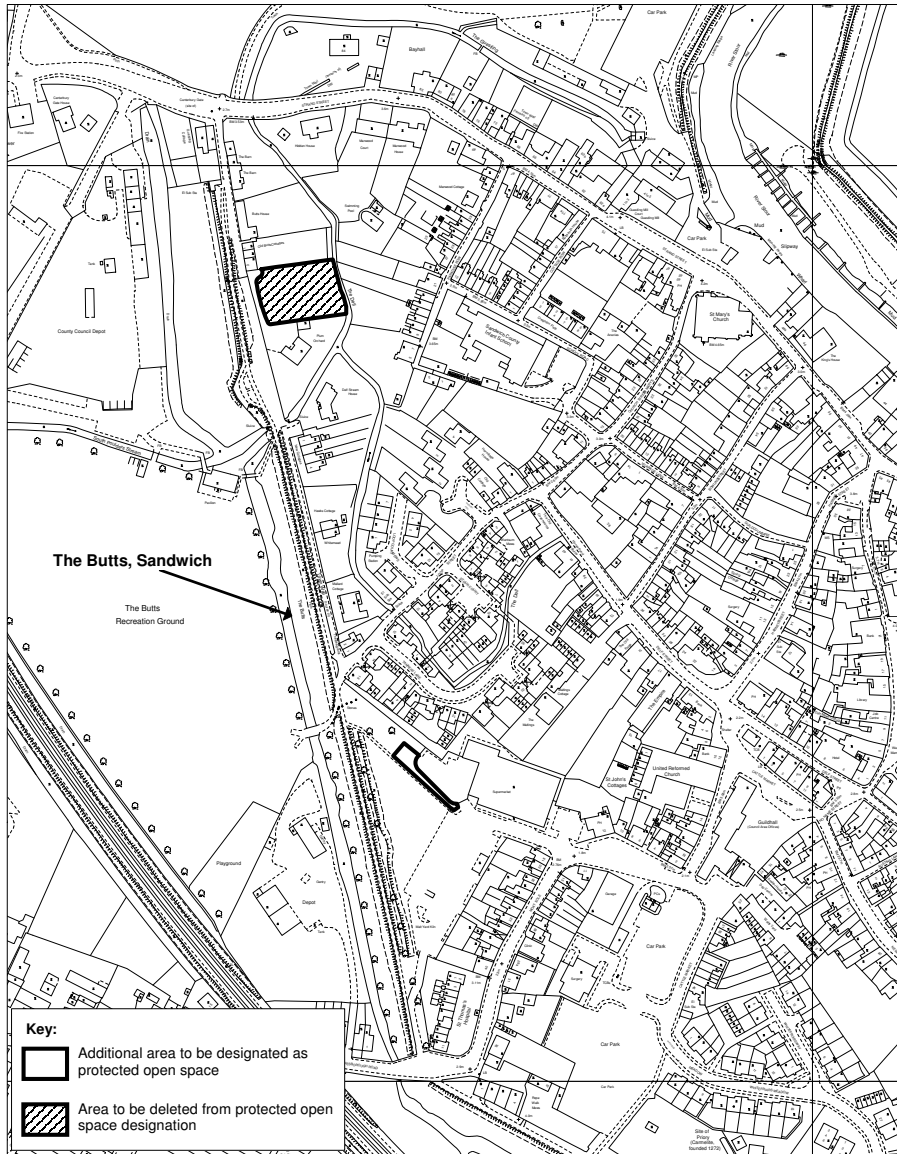
Map 4.15 Mill Hill & St Richard's Road, Deal



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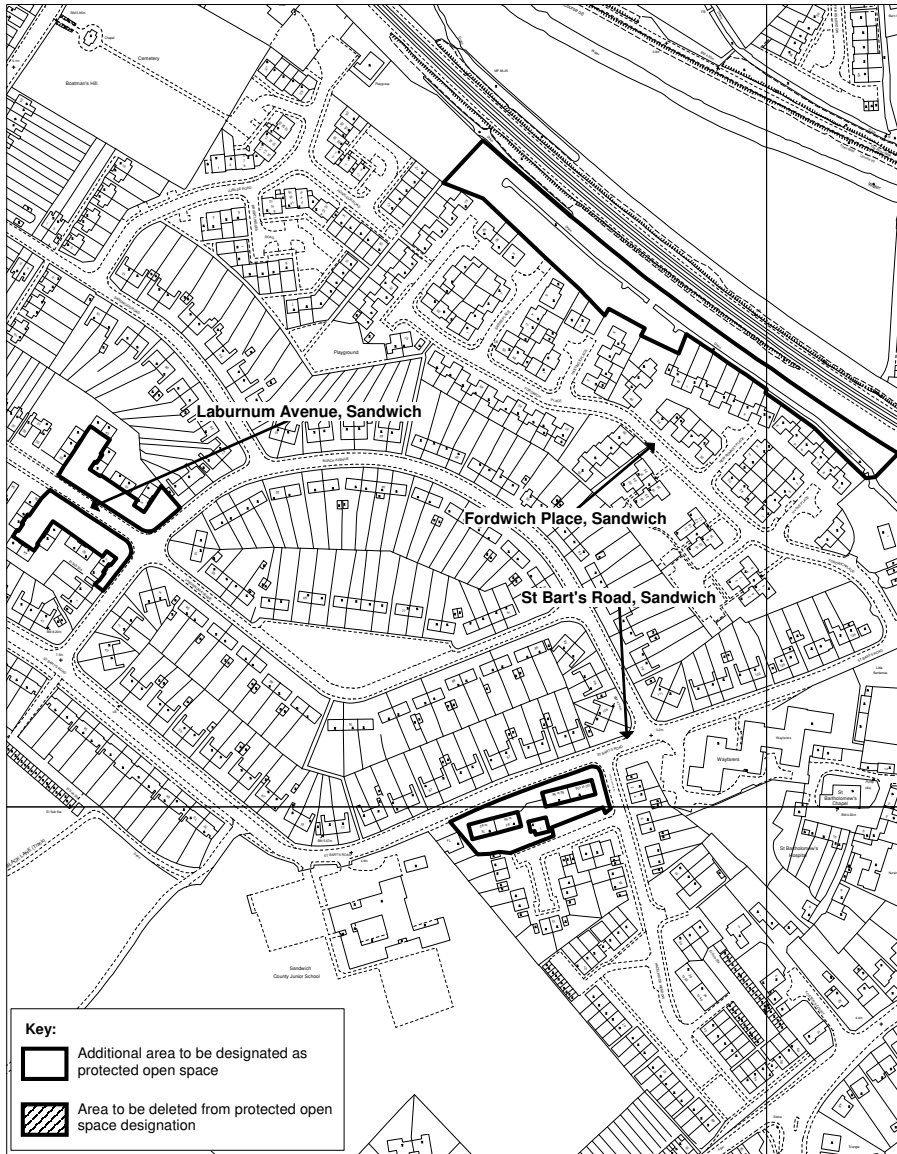
Map 4.16 Near Gazen Salts, Sandwich



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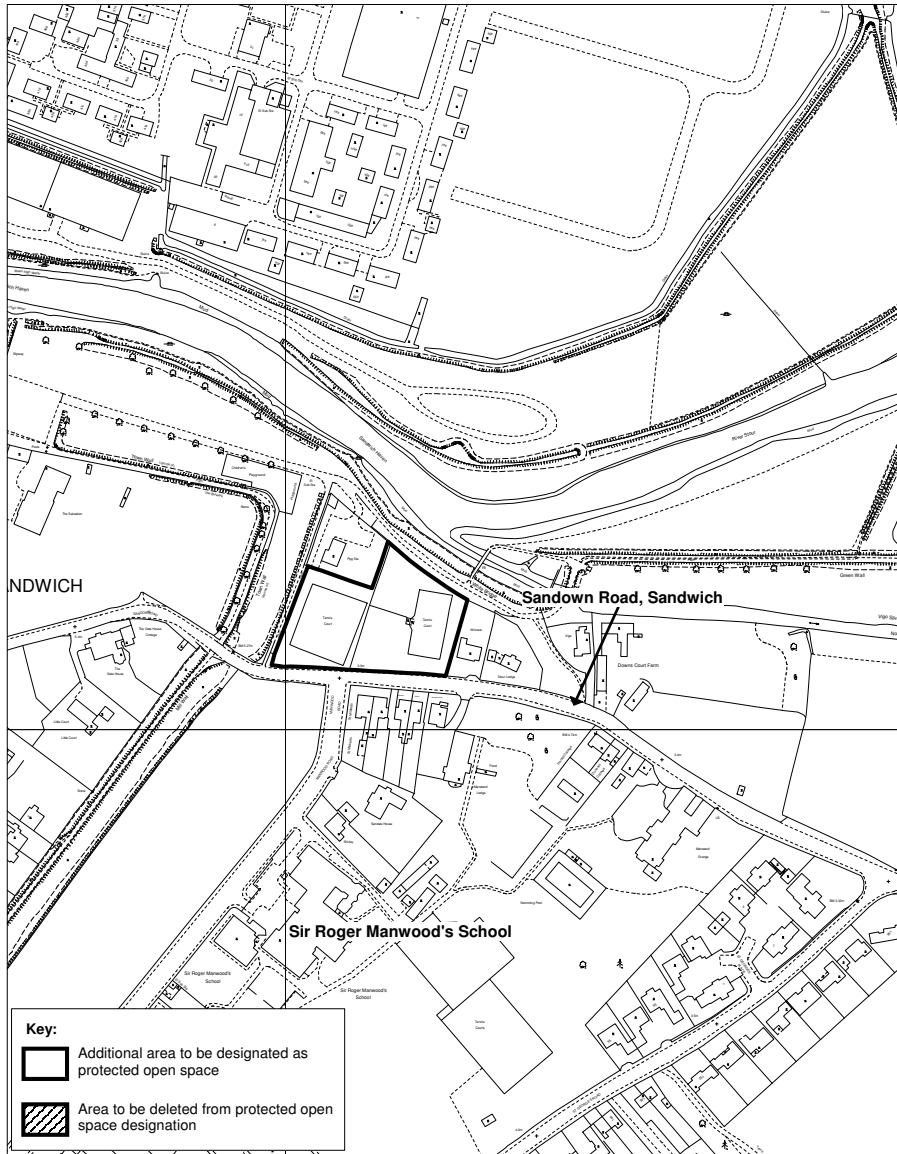
Map 4.17 The Butts, Sandwich



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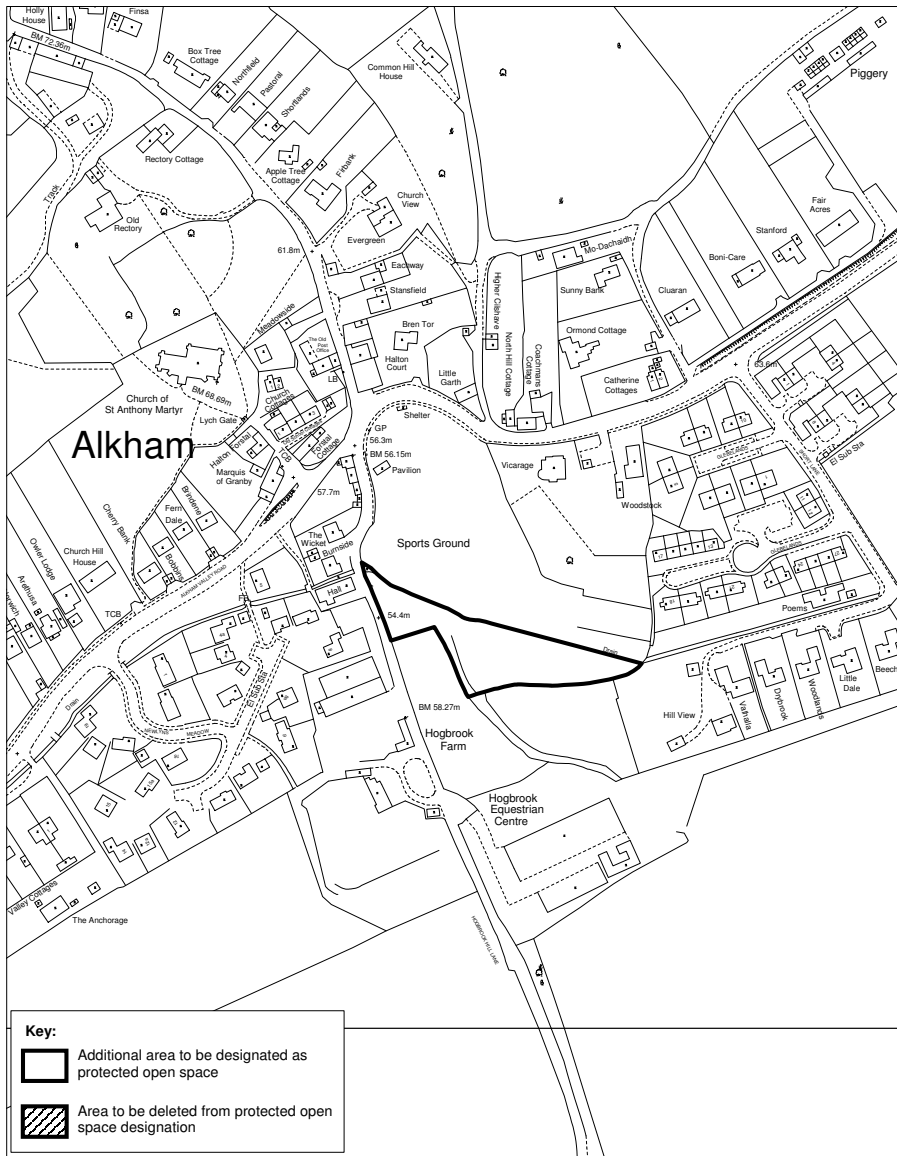
Map 4.18 Sandwich



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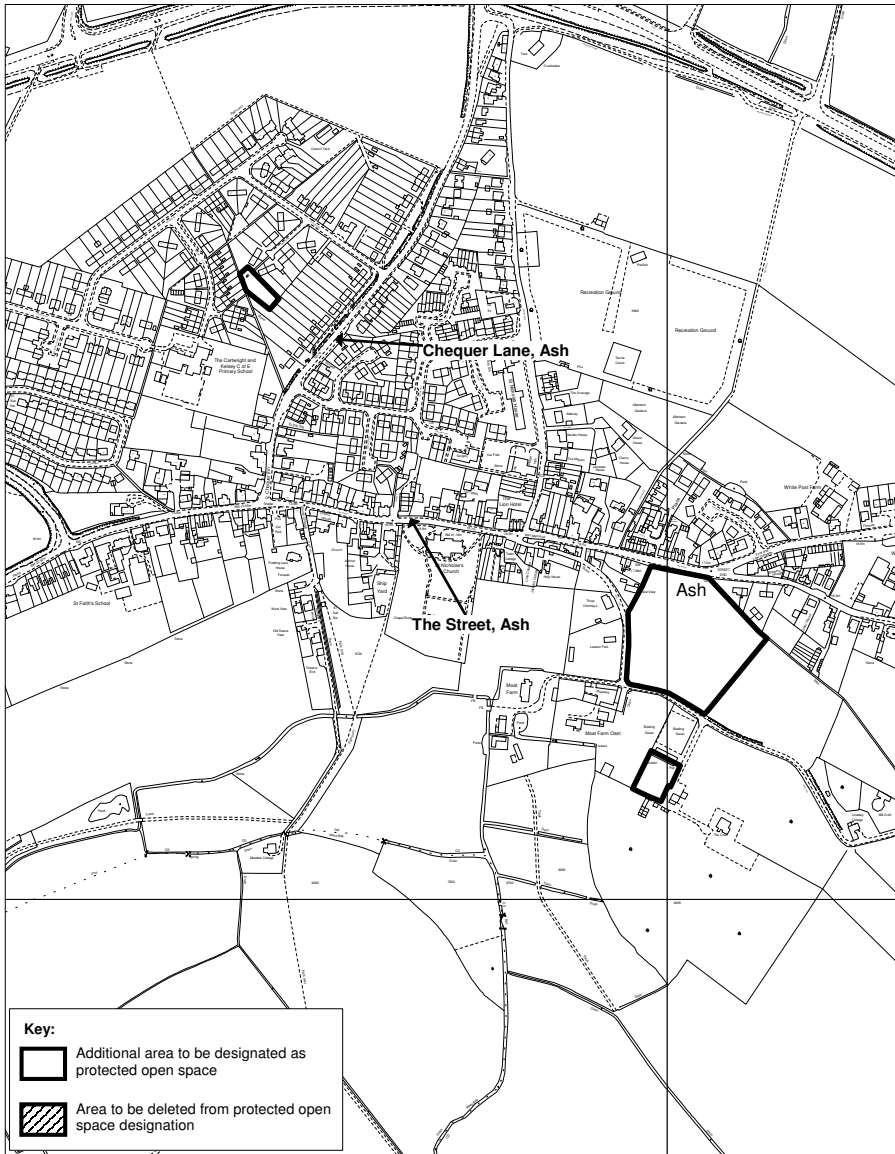
Map 4.19 Sandown Road, Sandwich



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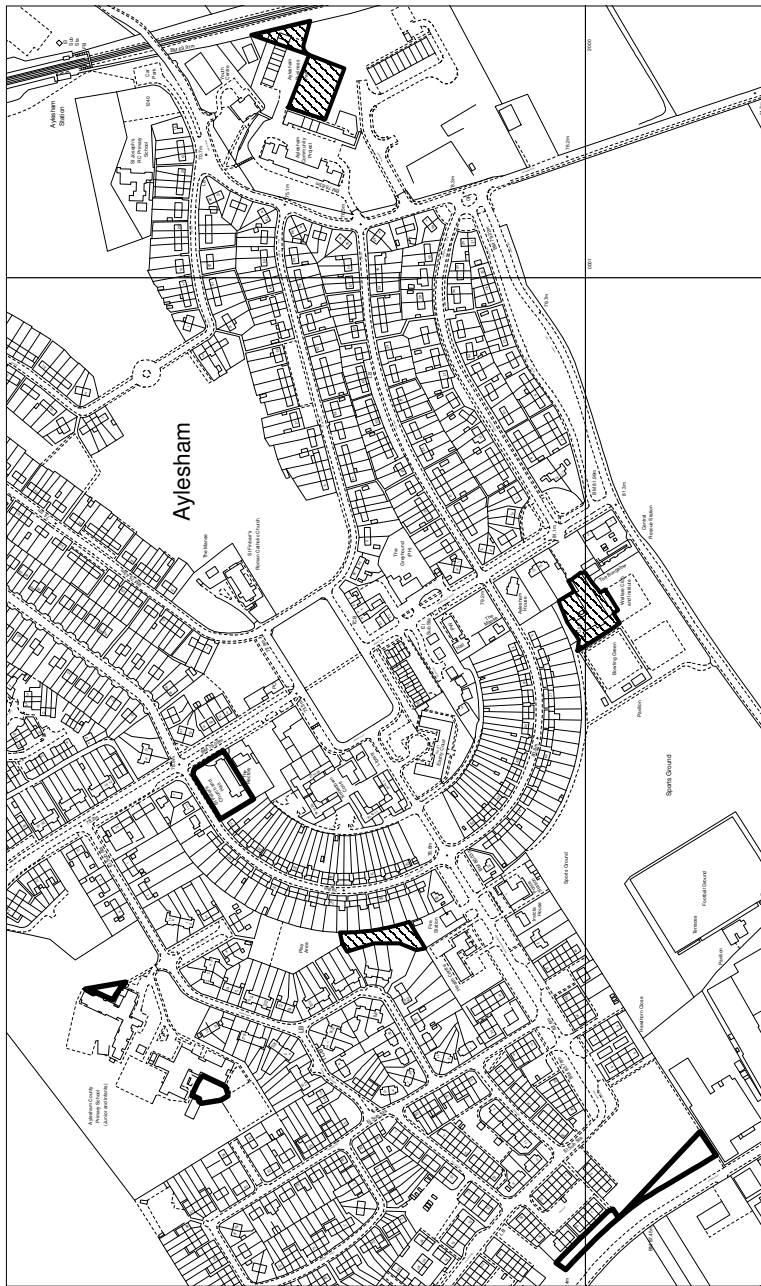
Map 4.20 Sports Ground, Alkham



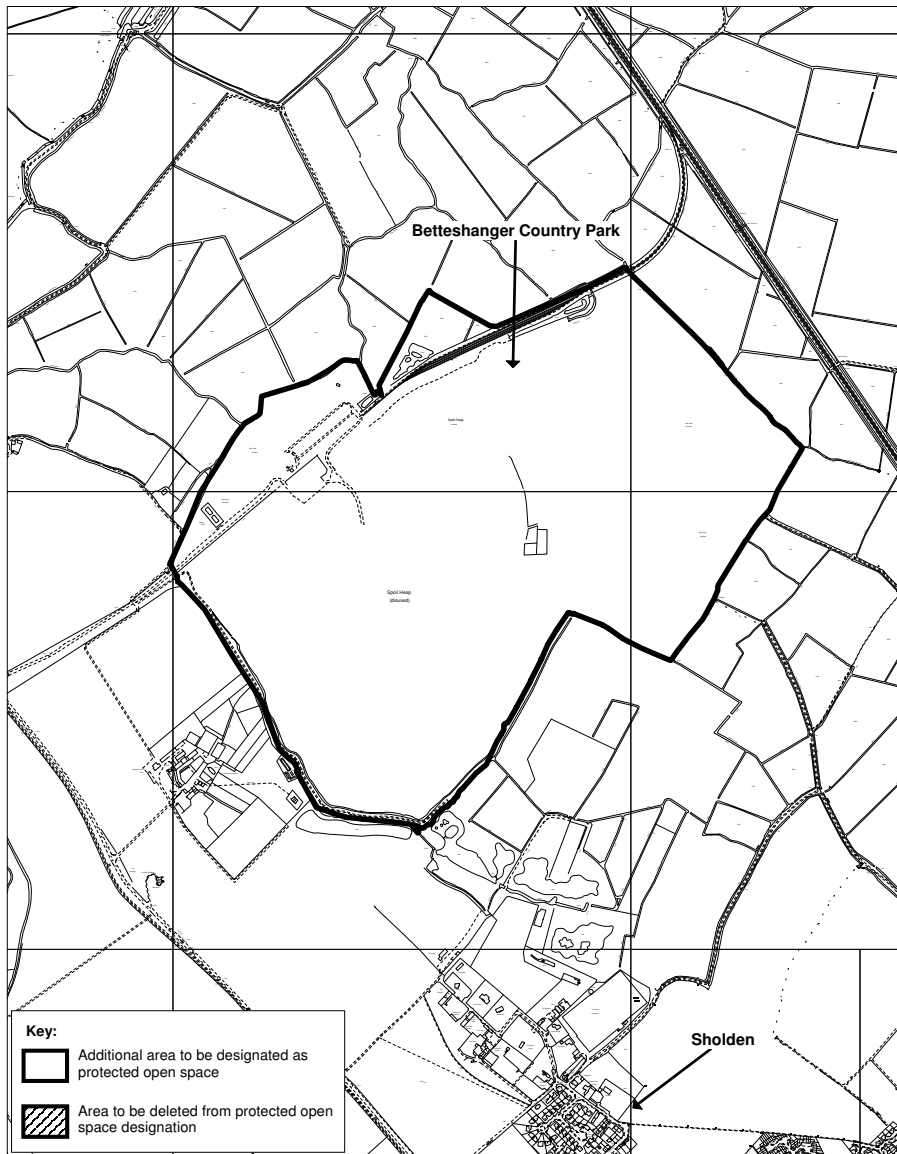
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Map 4.21 Ash



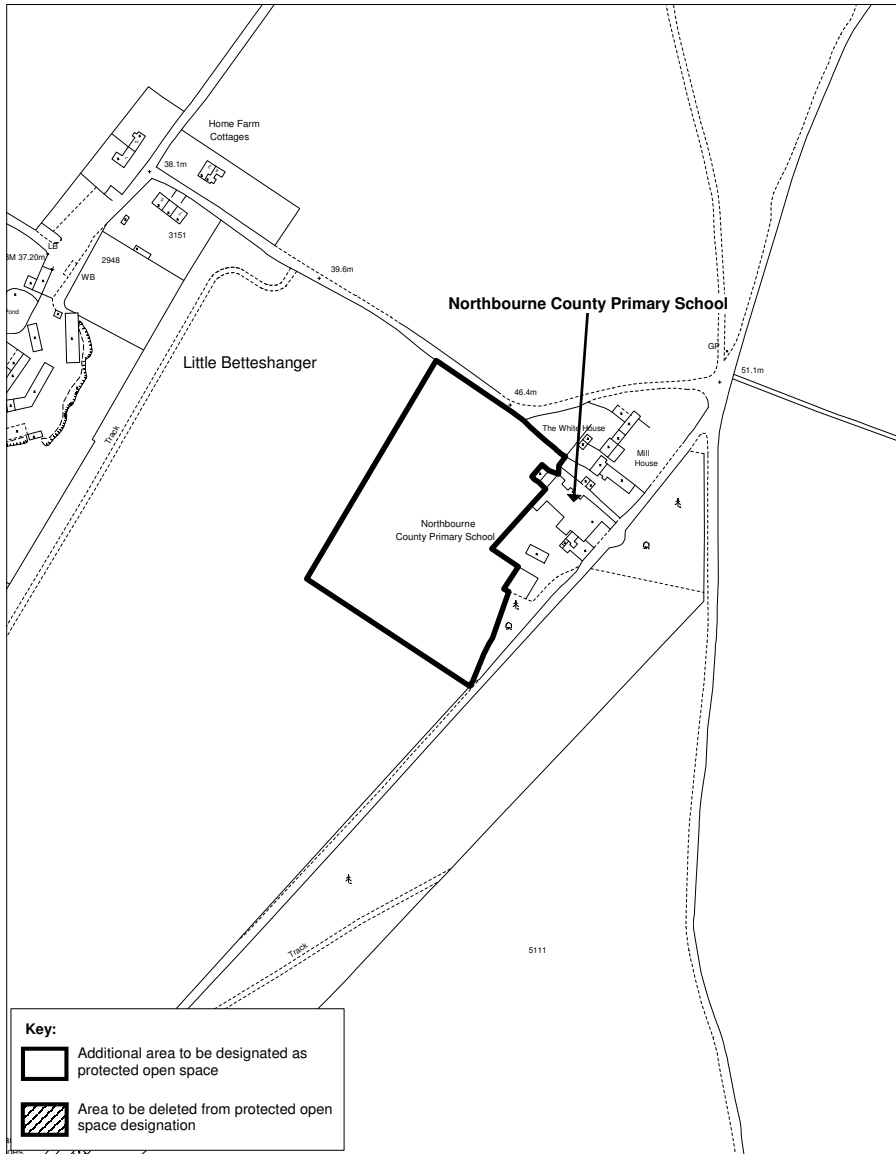
Map 4.22 Aylesham



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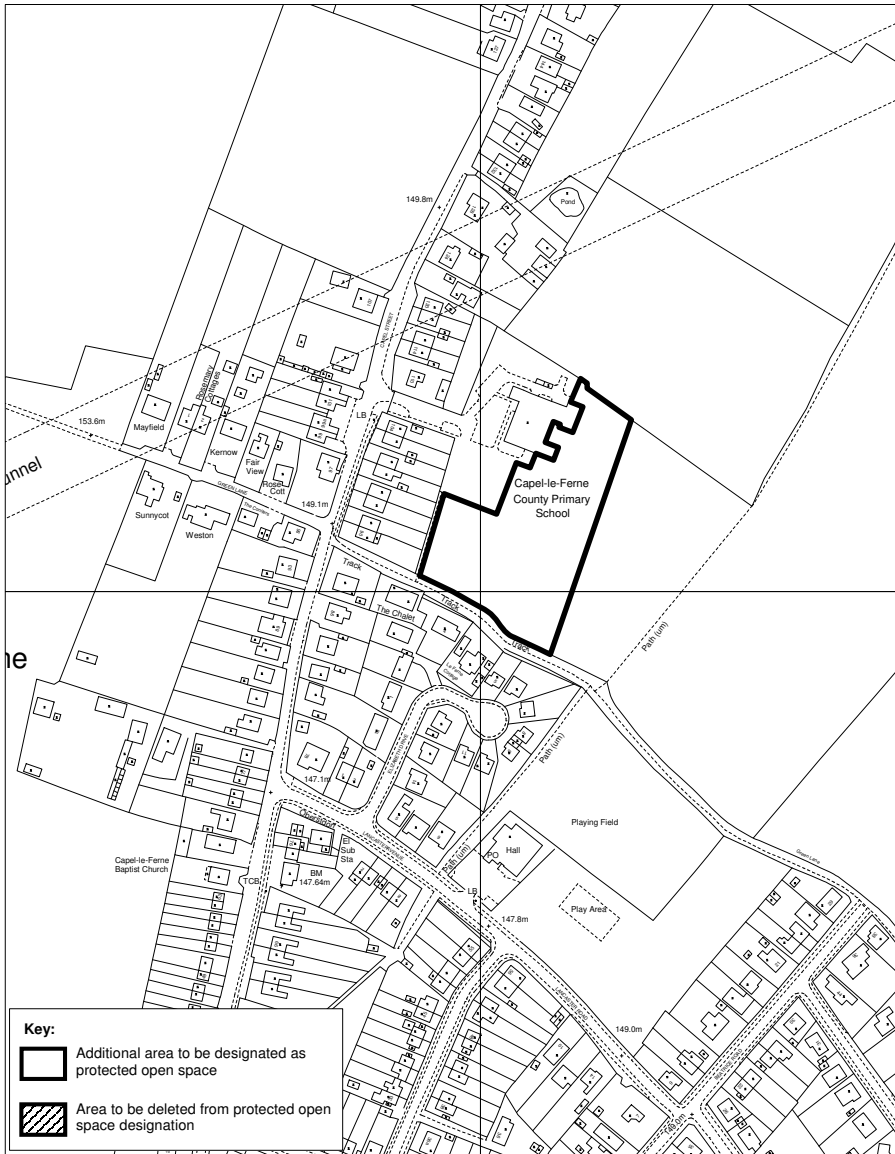
Map 4.23 Fowlmead Country Park



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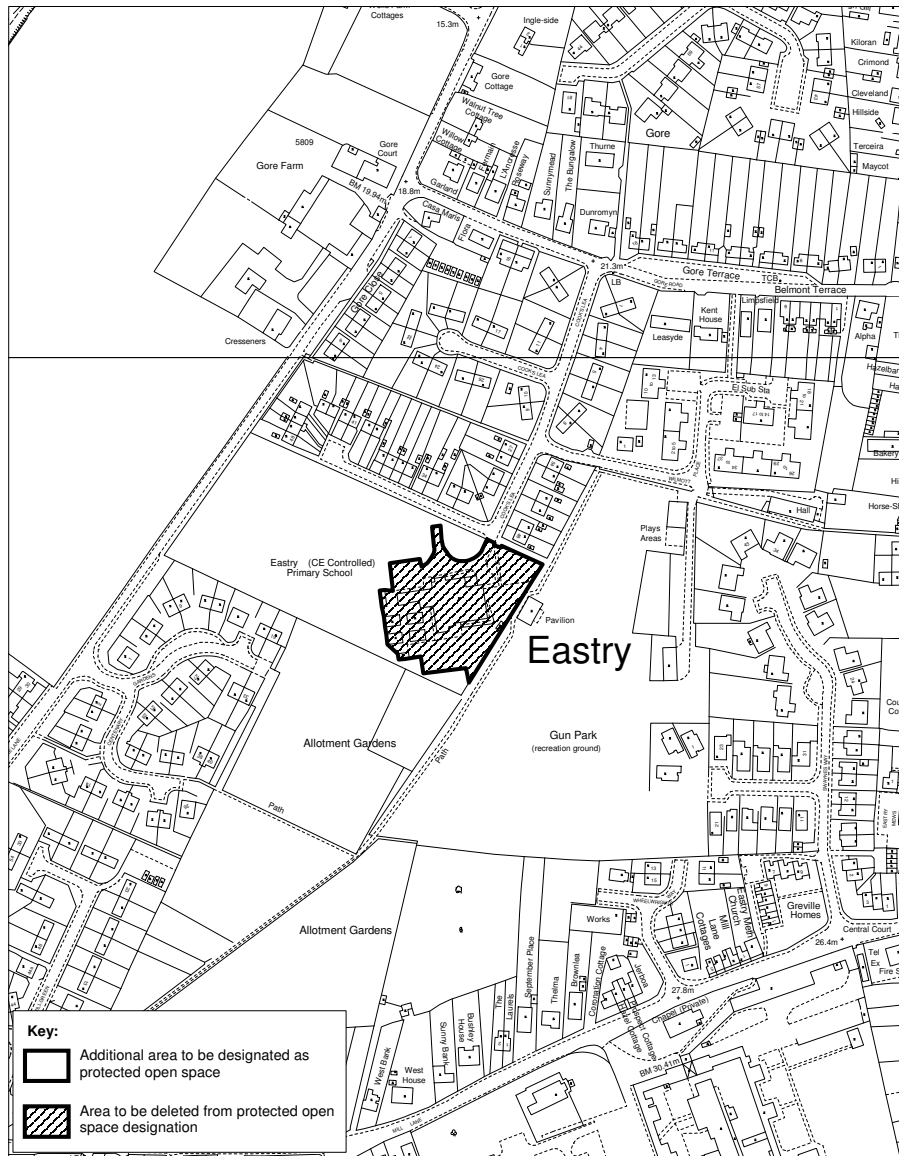
Map 4.24 Northbourne County Primary School



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Map 4.25 Capel le Ferne County Primary School



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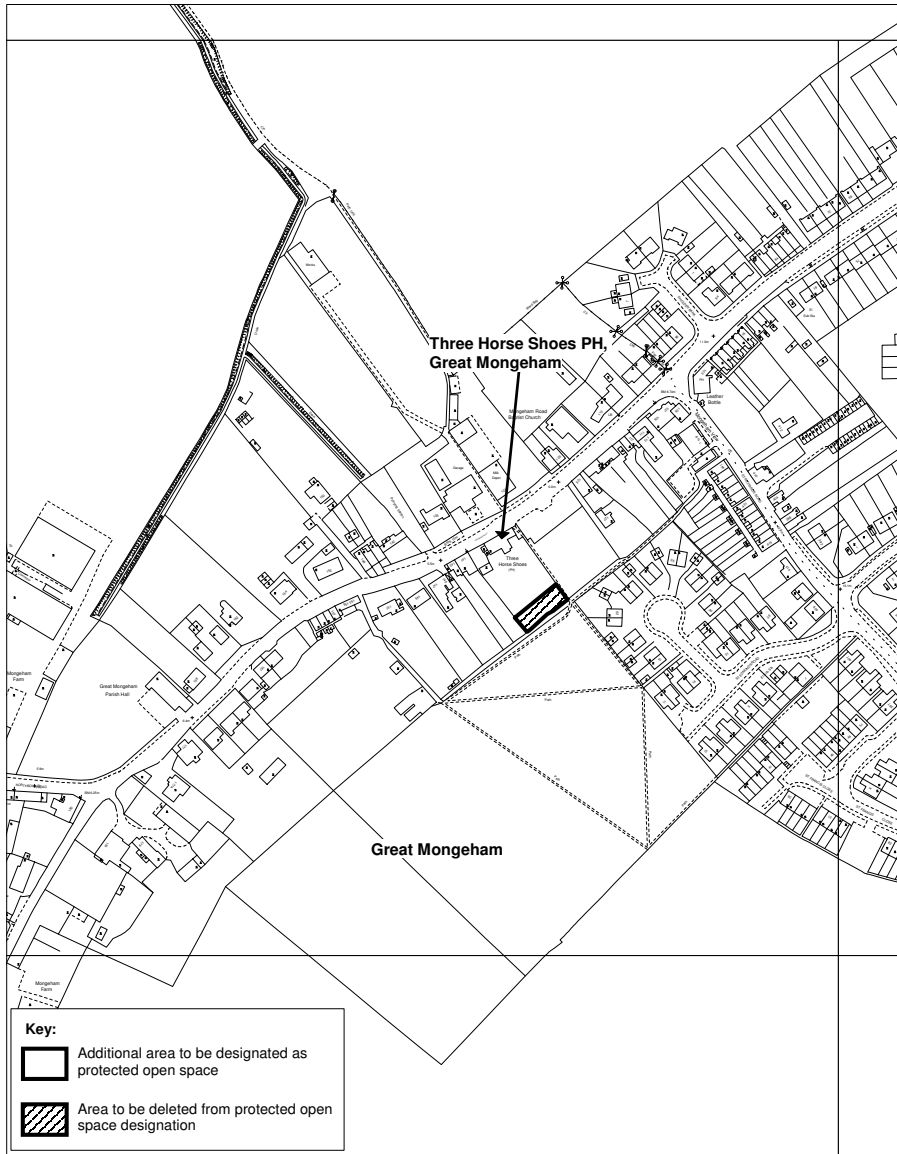
Map 4.26 Eastry County Primary School



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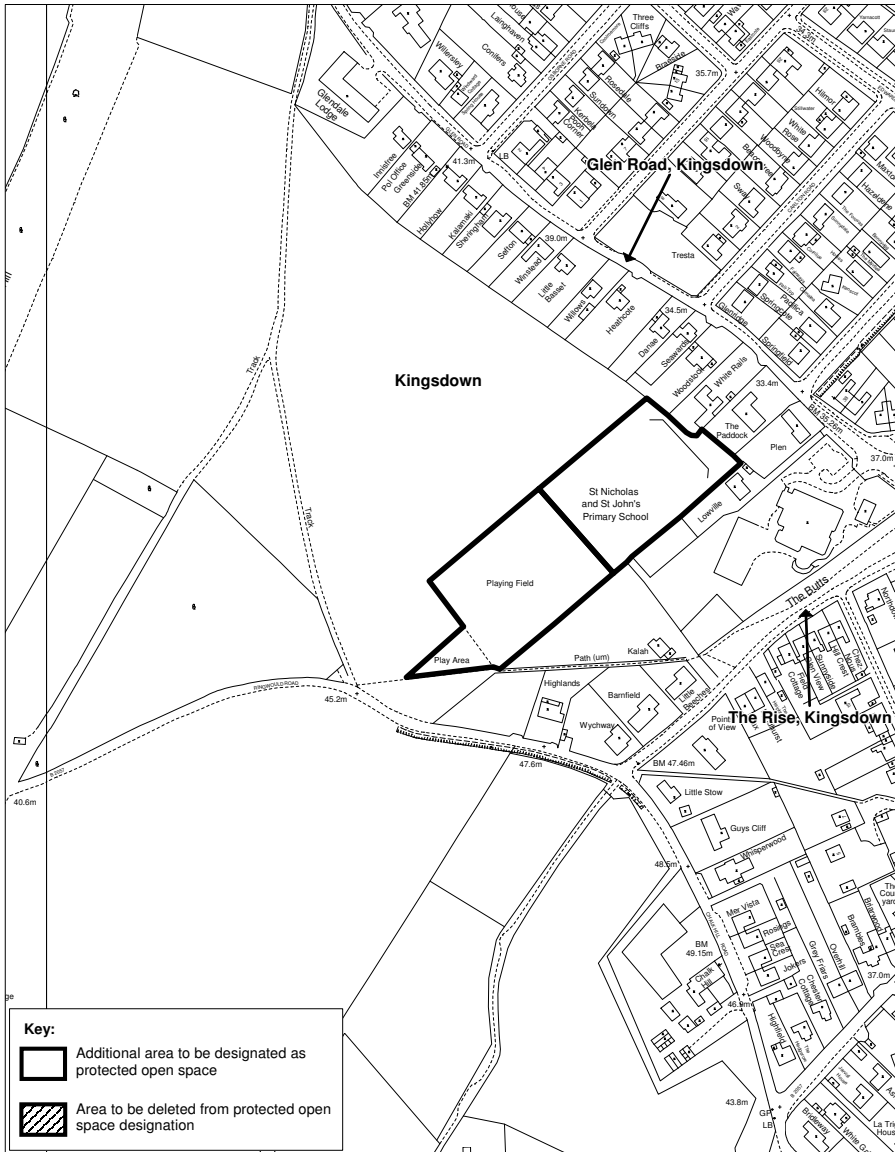
Map 4.27 Eythorne and Elvington



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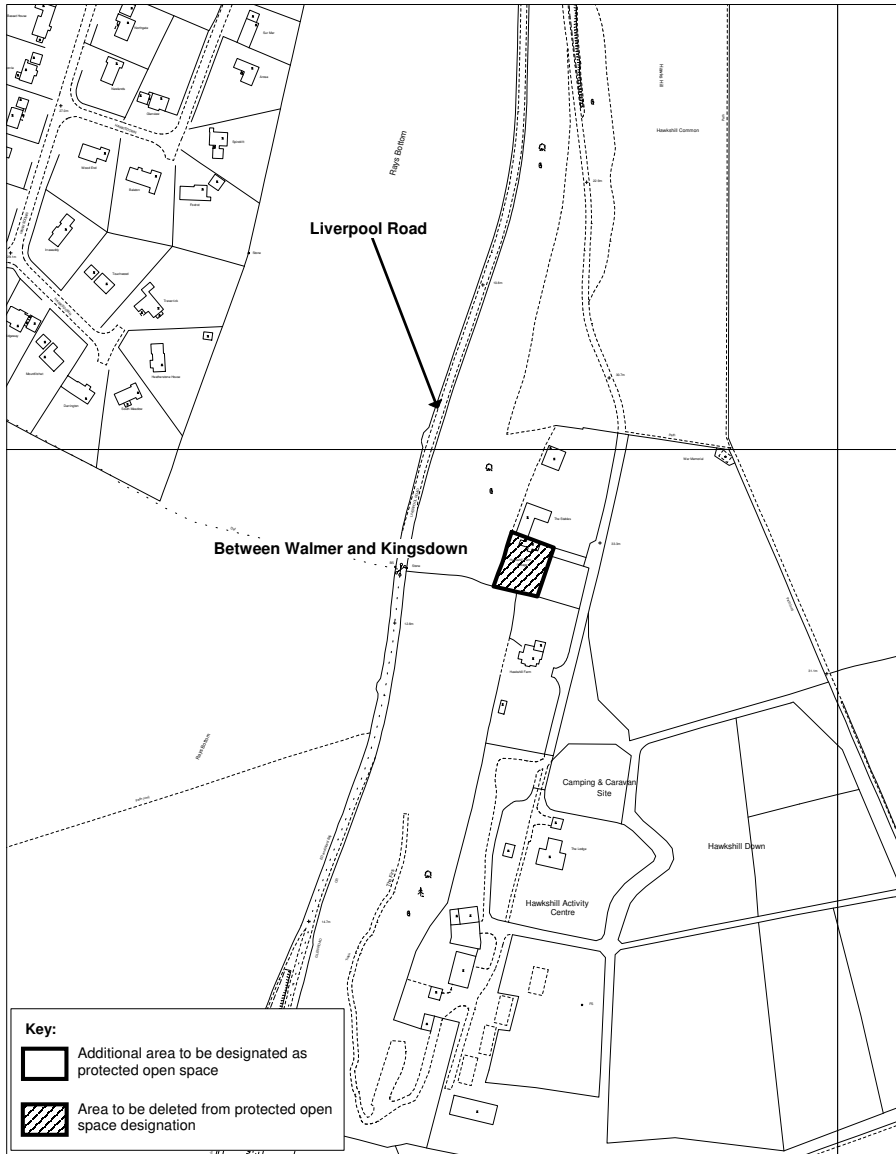
Map 4.28 Great Mongeham



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Map 4.29 St Nicholas and St John's Primary School, Kingsdown



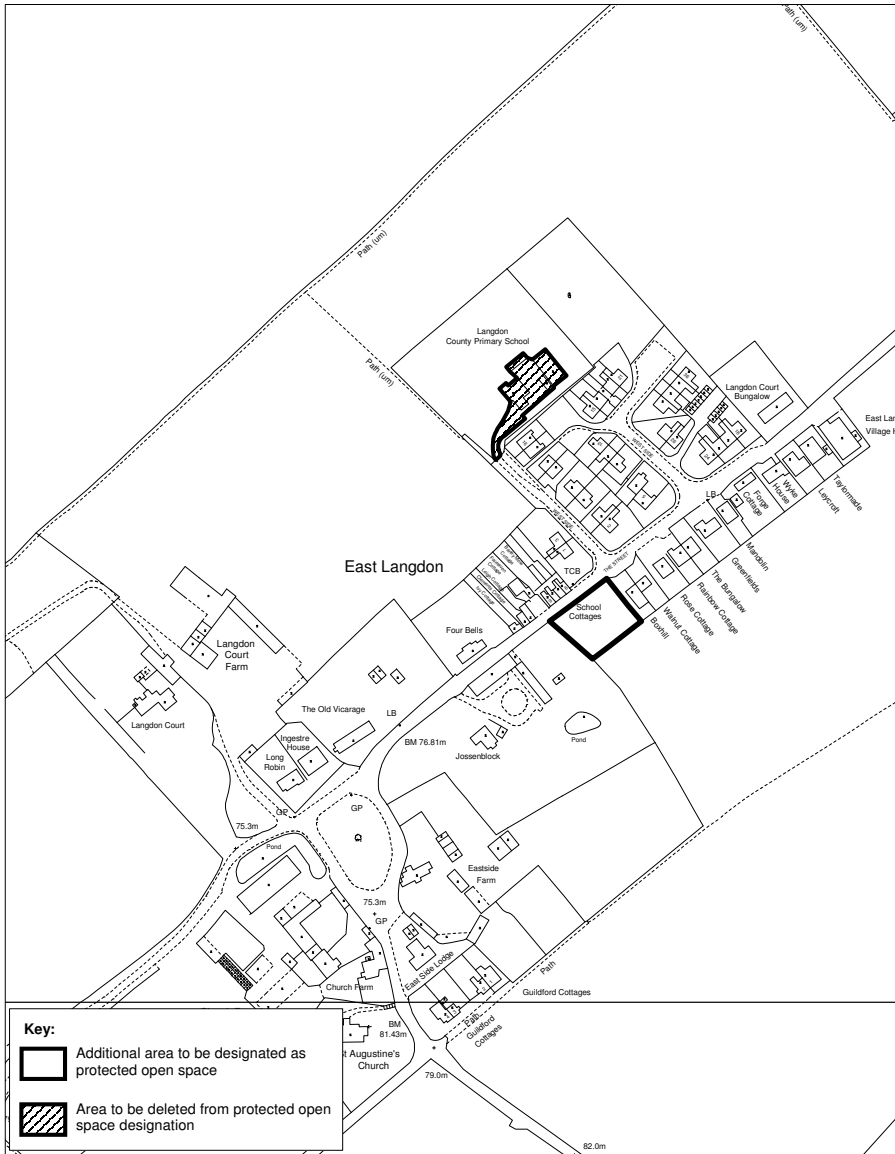
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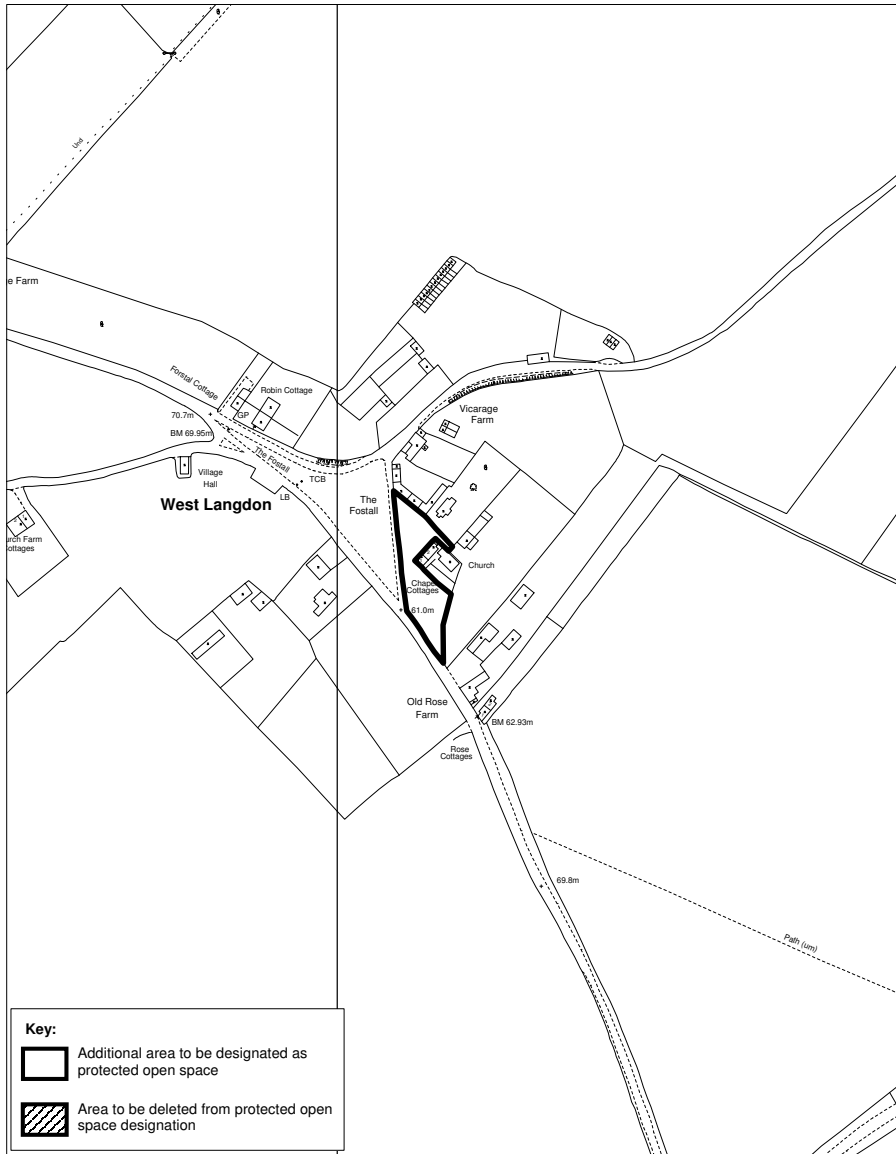
Map 4.30 Between Walmer and Kingsdown



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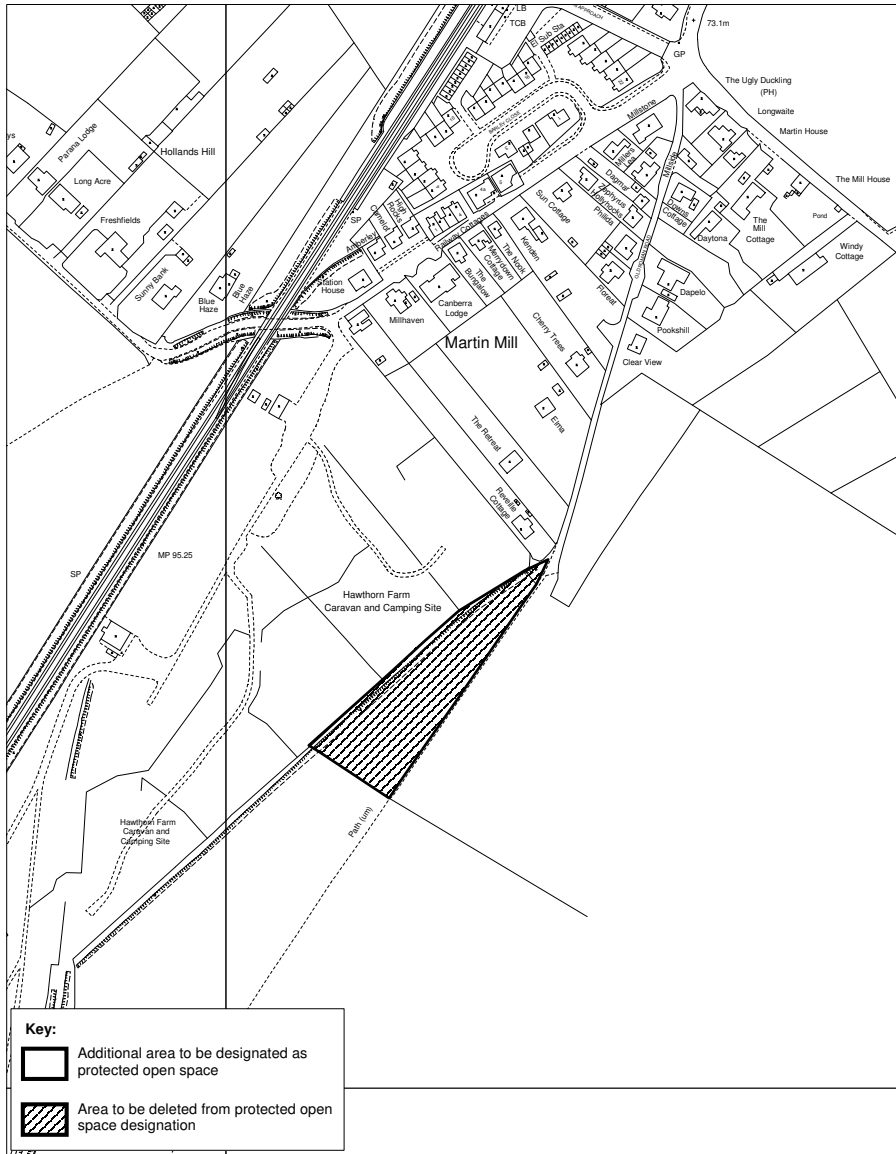
Map 4.32 West Langdon



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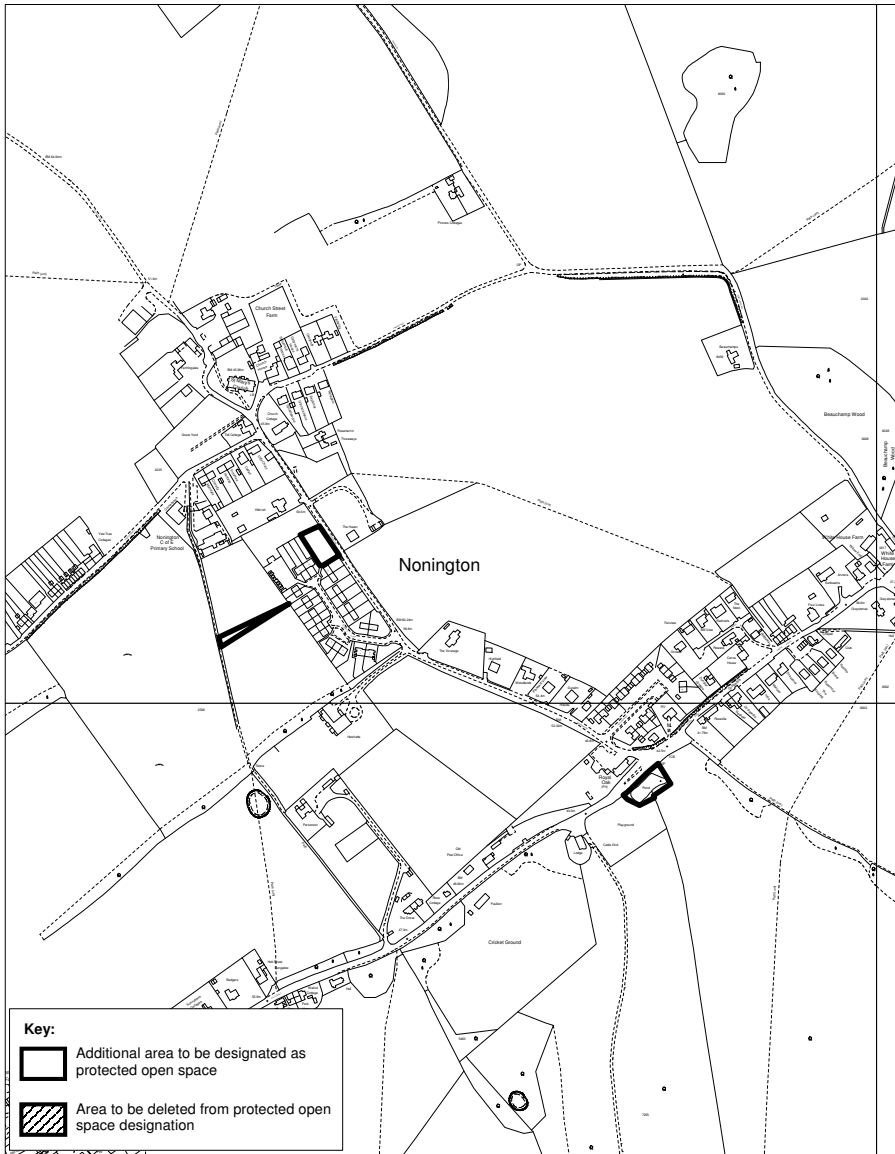
Map 4.33 Lydden



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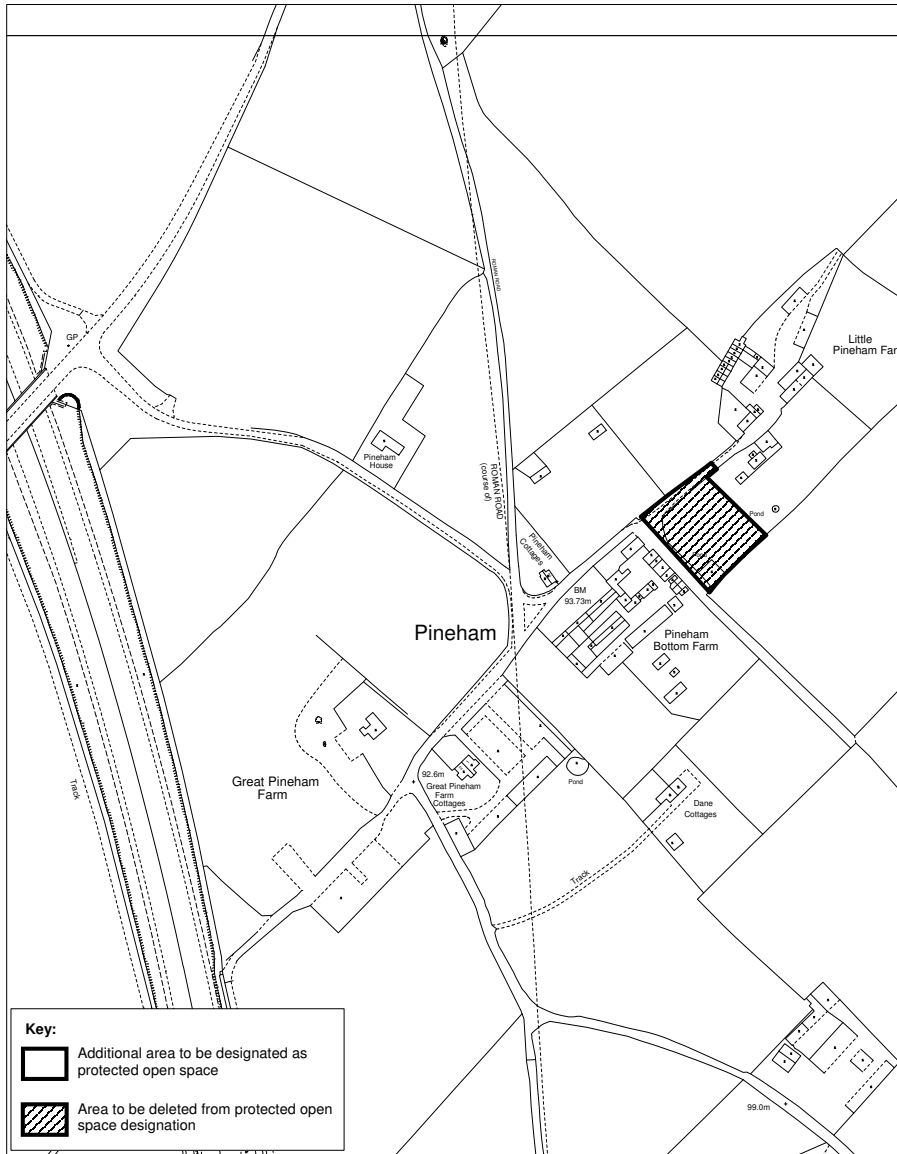
Map 4.34 Martin Mill



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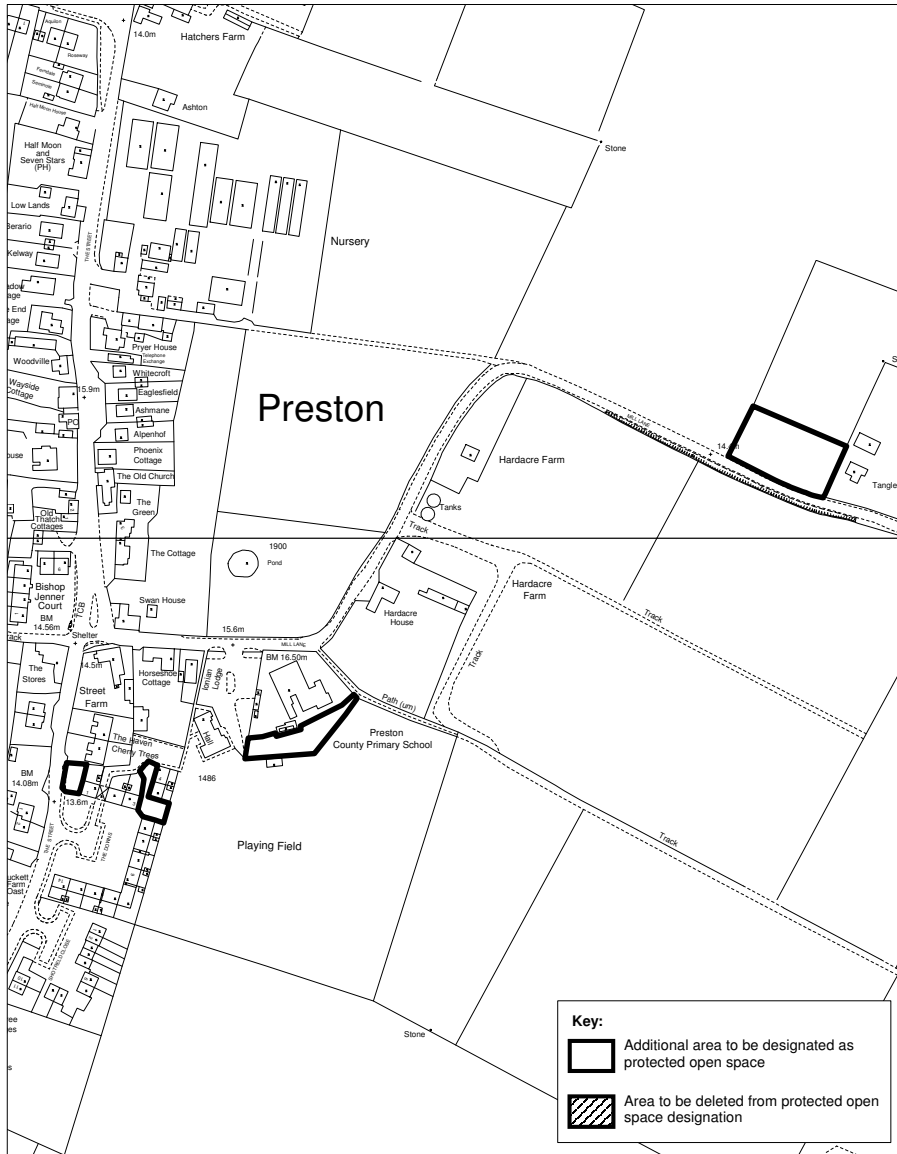
Map 4.35 Nonington



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Map 4.36 Pineham, Whitfield



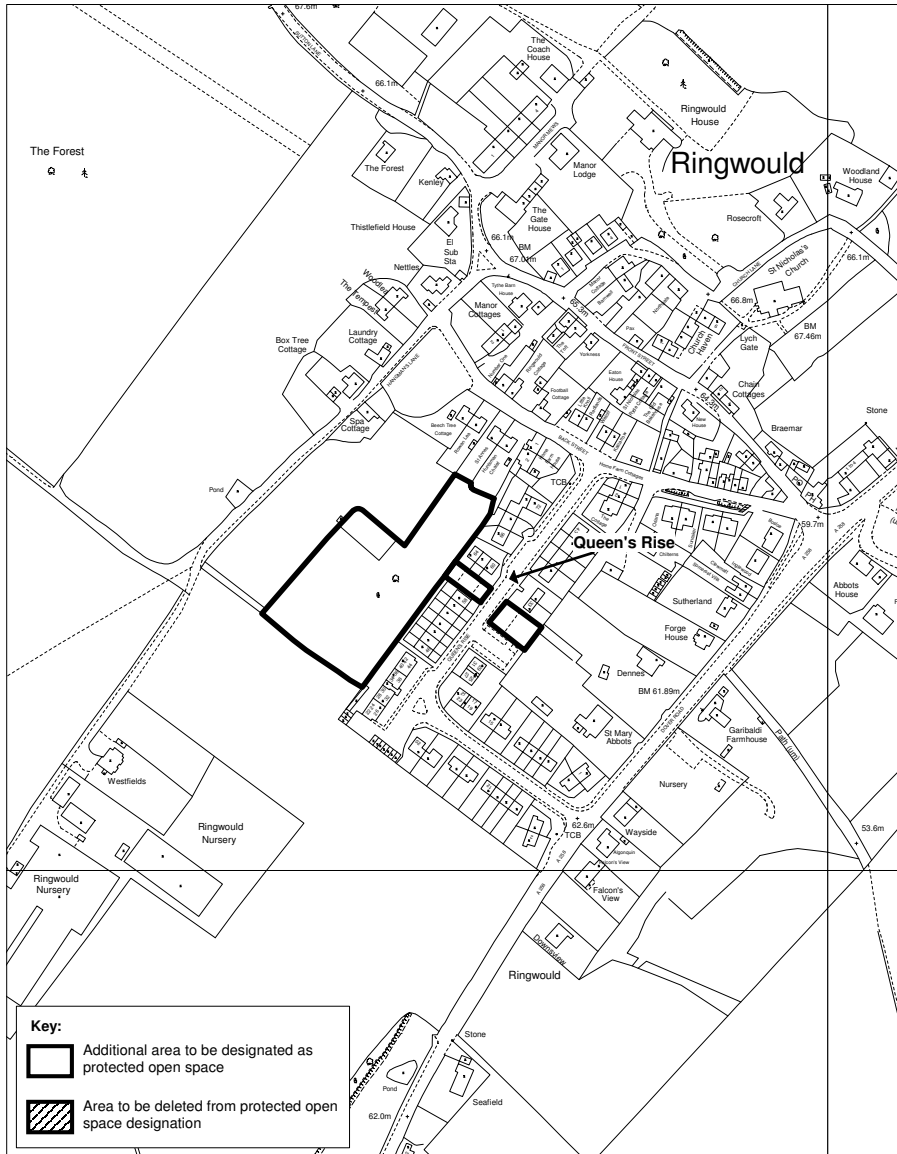
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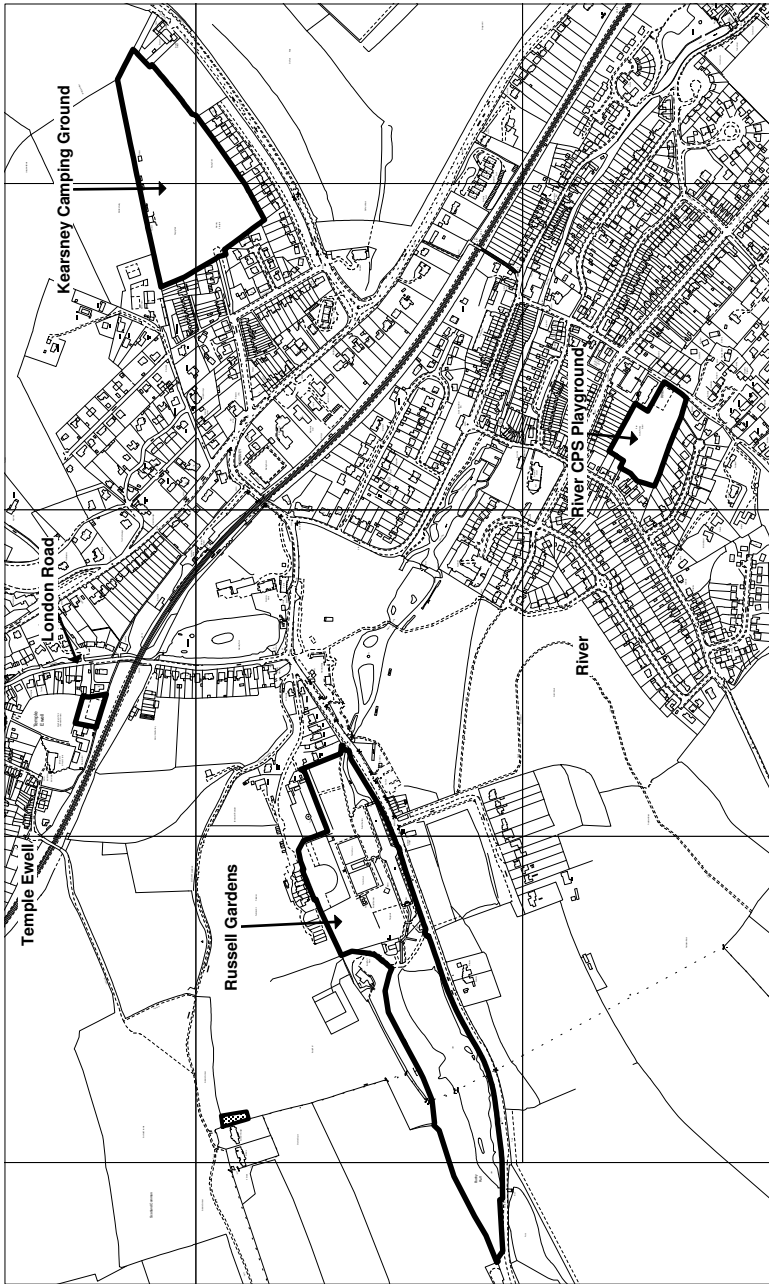
Map 4.37 Preston



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Map 4.38 Ringwold



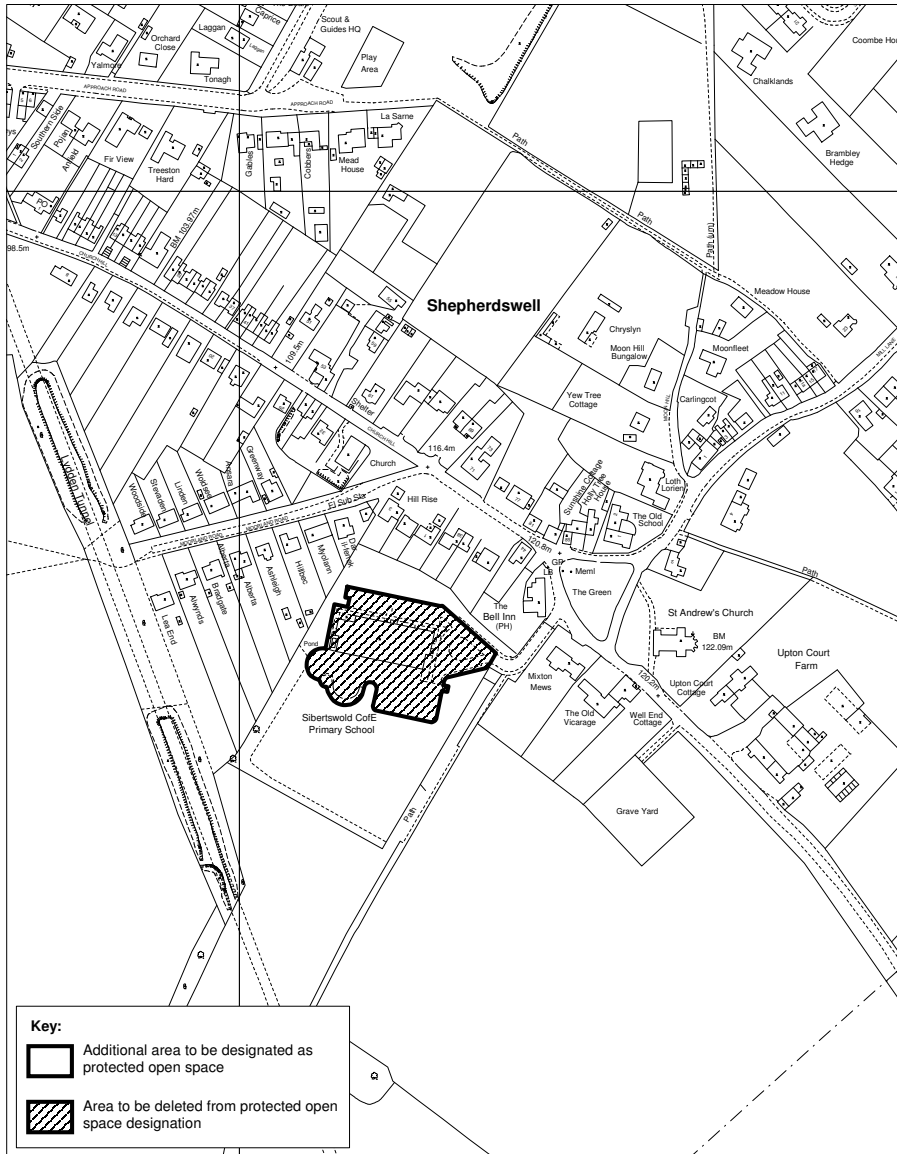
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Key:

- Additional area to be designated as protected open space
- Area to be deleted from protected open space designation



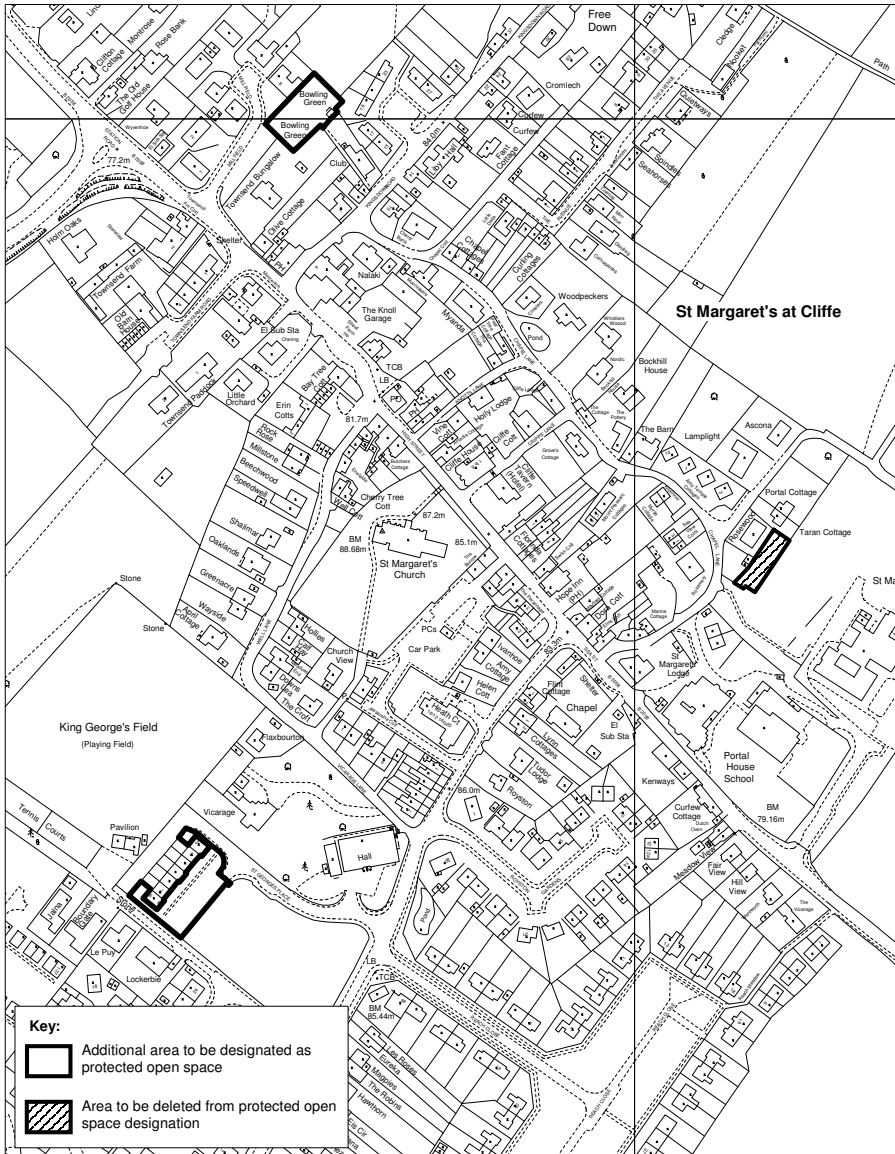
Map 4.39 River



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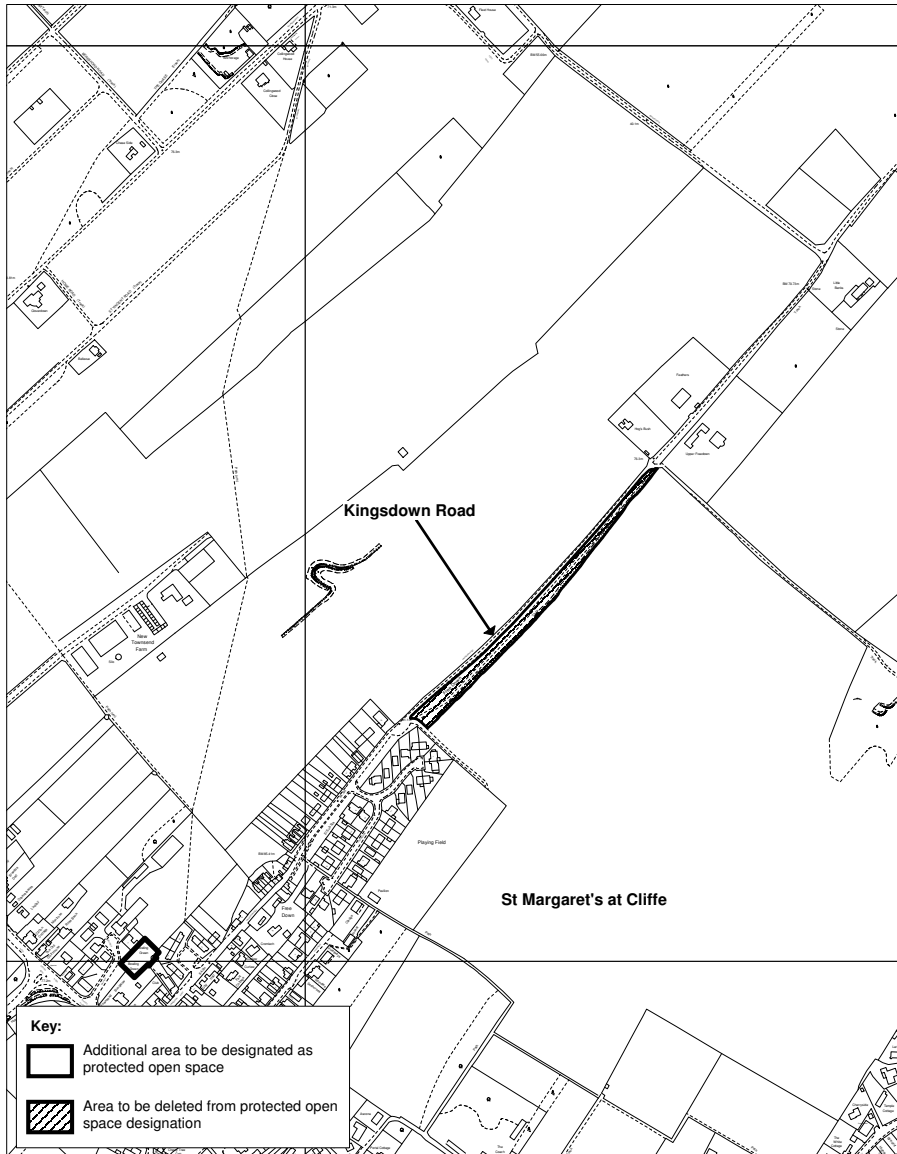
Map 4.40 Shepherdswell



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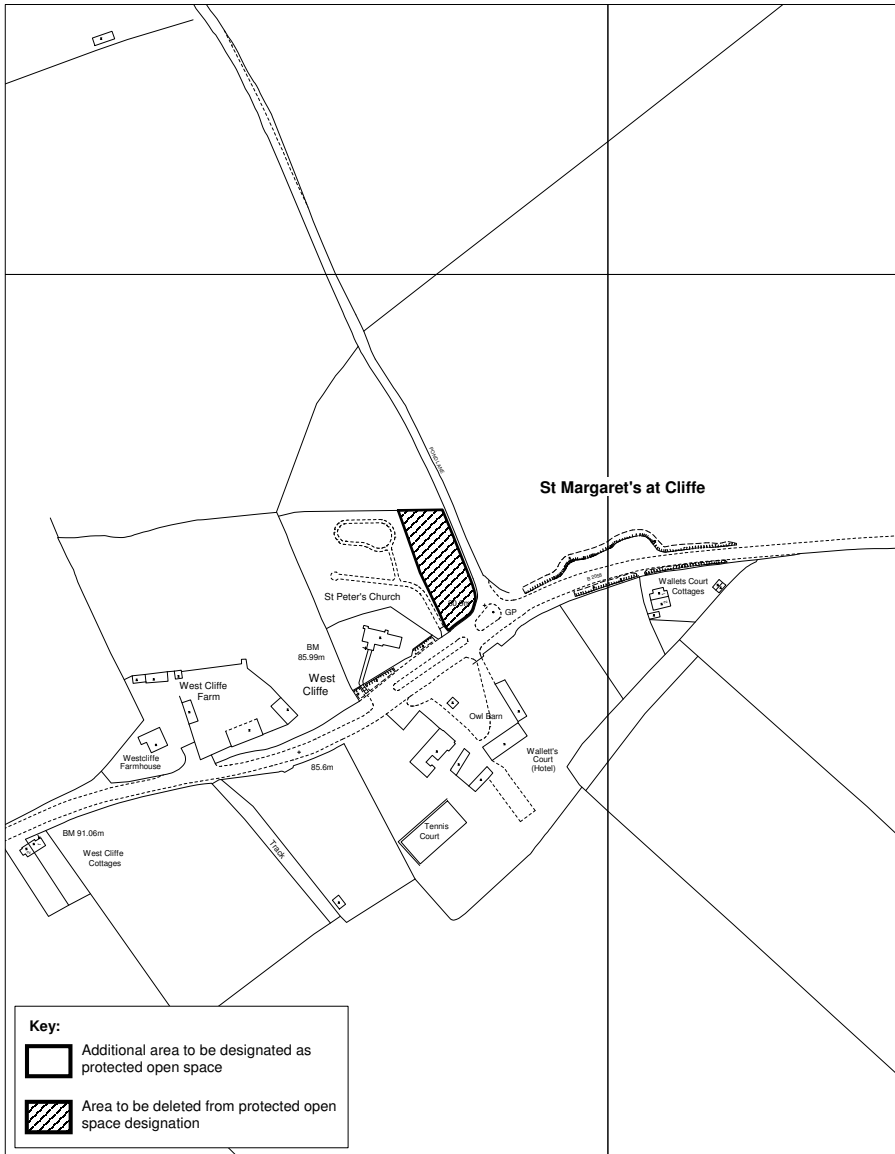
Map 4.41 St Margaret's at Cliffe



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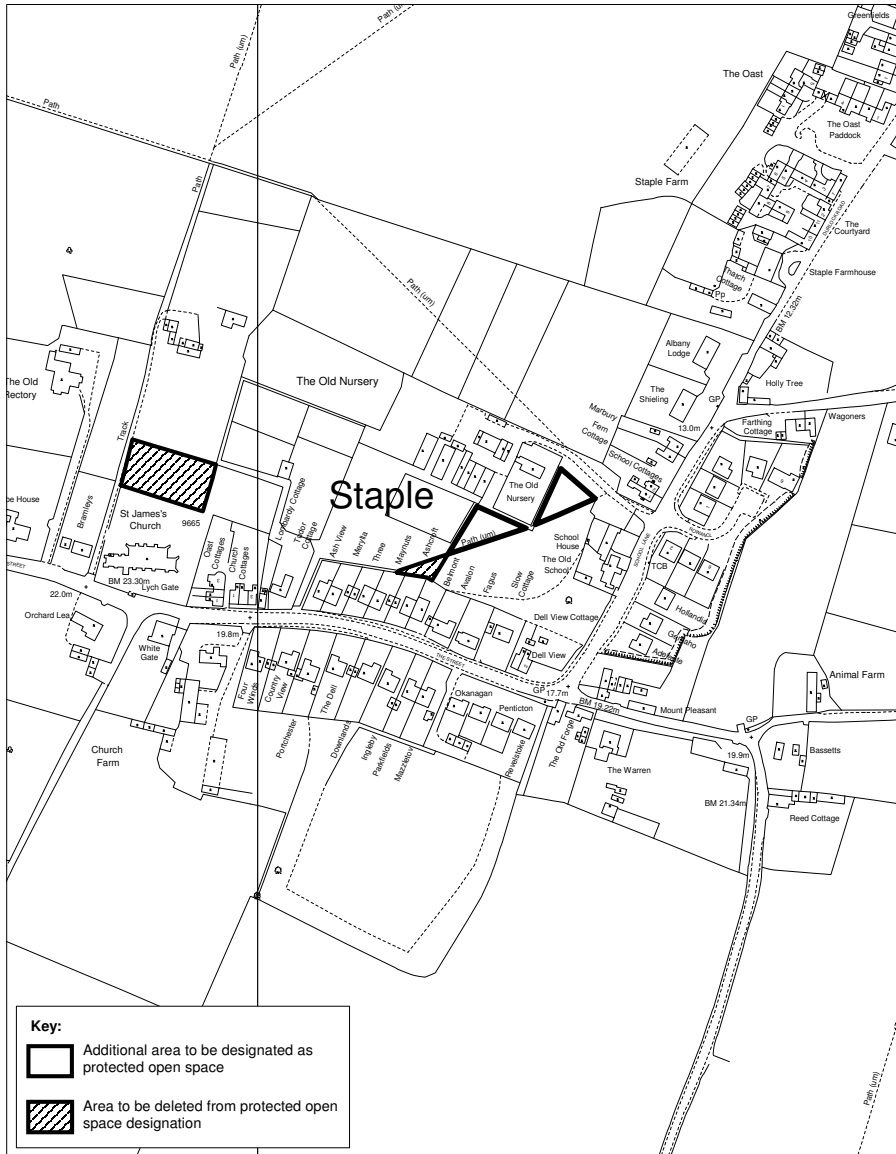
Map 4.42 Kingsdown Road, St Margaret's at Cliffe



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Map 4.43 St Peter's Church, West Cliffe, St Margaret's at Cliffe



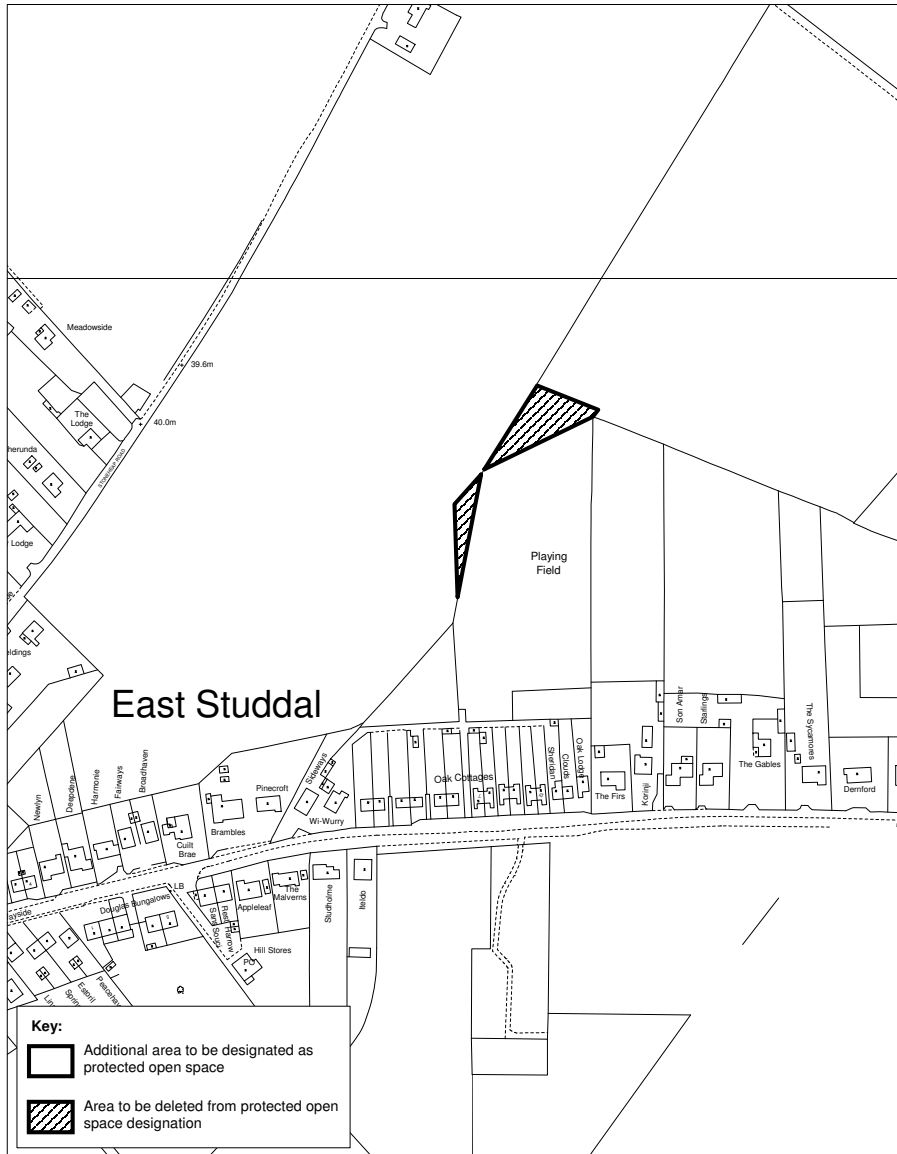
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Map 4.44 Staple



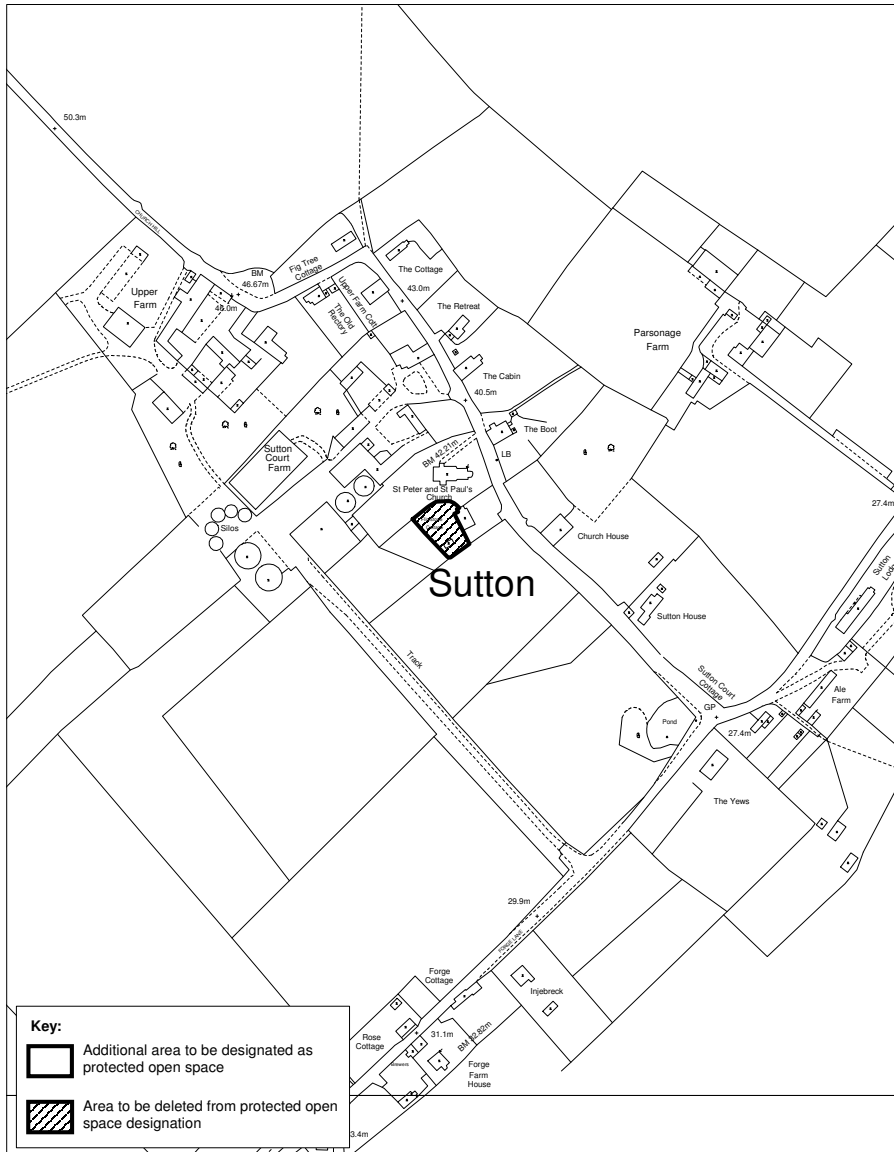
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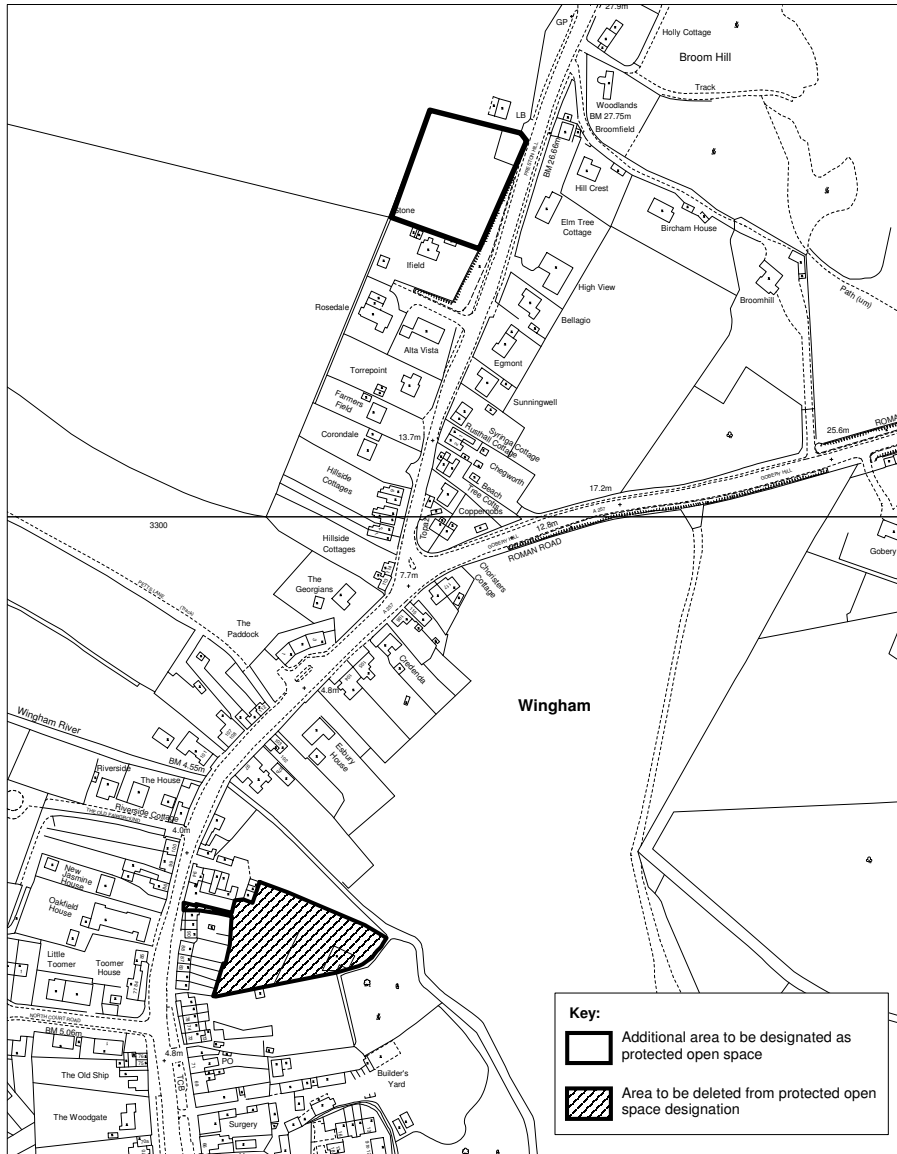
Map 4.45 East Studdal



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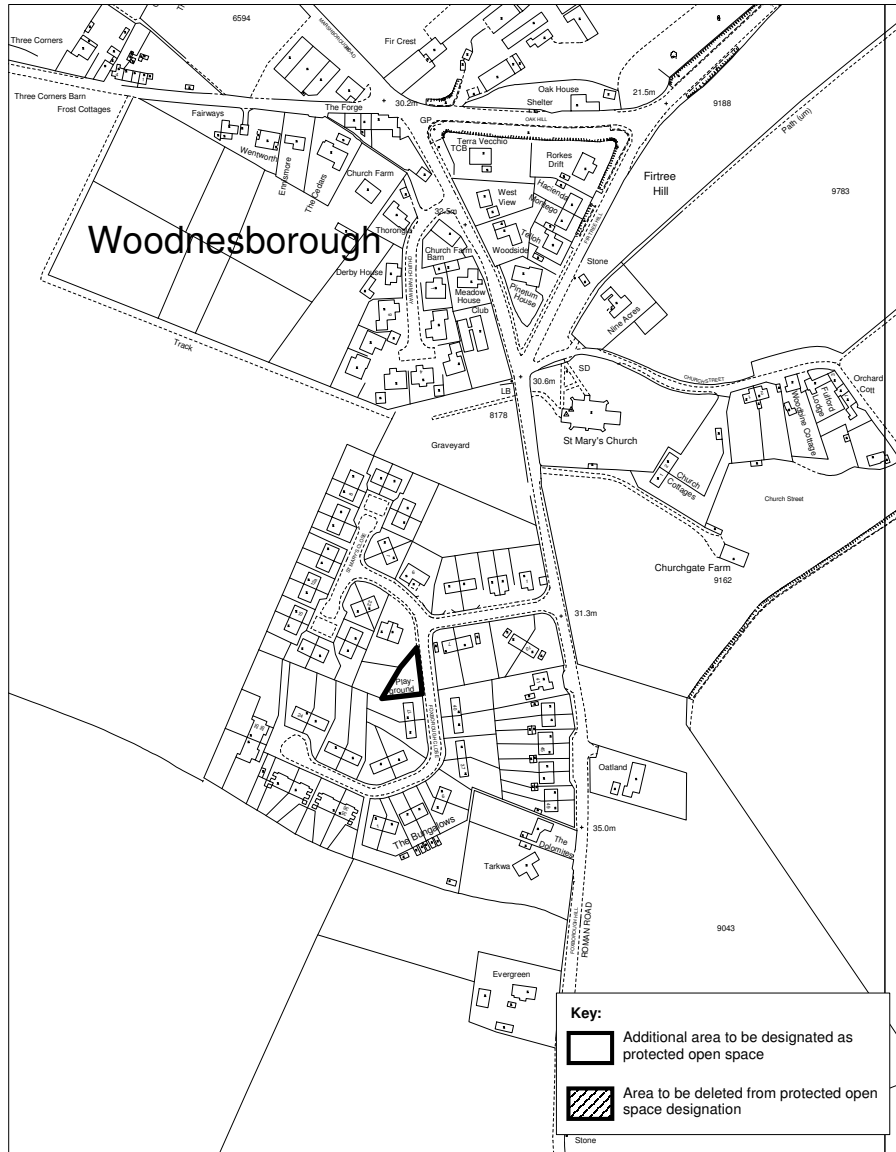
Map 4.46 Sutton



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Map 4.47 Wingham



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Map 4.48 Woodnesborough



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Map 4.49 Wootton

Appendix 5 Glossary

Term	Definition
Accessible Green Space	Open space that may be freely accessed for a variety of amenity purposes including parks and gardens, green corridors, village greens, informal kick-about areas and closed churchyards.
Affordable Housing	Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.
Annual Monitoring Report (AMR)	The Council is required to produce an AMR each year to assess the performance and effects of the LDF. Copies of the AMR are available on the District Council website.
Area of Change	Parts of Dover that are either in need of renewal or do not fulfil their potential but where proposals are not yet sufficiently advanced to justify a site specific allocation in the Plan.
Area of Outstanding Natural Beauty (AONB)	Areas of Outstanding Natural Beauty are designated under the National Parks and Access to the Countryside Act 1949 for their outstanding landscape quality.
Background Buildings	Buildings that form a backdrop to public space and enclose space. They form the majority of buildings.
Biodiversity	The diversity of plant and animal life in a particular habitat or area.
Bus Rapid Transit (BRT)	A flexible, frequent, dependable bus transit system that combines a variety of physical and operating elements into a permanent and integrated system with a quality image and unique identity.
Channel Tunnel Rail Link	High speed rail route linking the Channel Tunnel with Ashford, Ebbsfleet and London.
Code for Sustainable Homes	A National Code that measures the sustainability of a new home against categories of sustainable design, rating the 'whole home' as a complete package.
Commercial Information Audit	An annual commercial land study that is undertaken to meet policy and research requirements. It is managed and co-ordinated by Kent County Council and undertaken by the Local Authorities. Information collected includes developments that have not been started, under construction and completed. Studies for each District in Kent can be viewed at, http://www.kent.gov.uk/your_council/kent_facts_and_figures/housing_and_commercial_land.aspx .
Community Infrastructure Levy (CIL)	A new charge which local authorities in England and Wales will be empowered, but not required, to charge on most types of new development in their area. CIL charges will be based on simple formulae which relate the size of the charge to the size and character of the development paying it.
Compulsory Purchase	Legislation in England and Wales that gives local authorities the power to acquire land compulsorily, to help deliver social and economic change, where the landowner or occupier is not willing to sell by agreement.
Conservation Areas	A statutory designation made by the local planning authority for areas that have a special architectural or historical interest. Designated under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990.
Core Strategy	The Core Strategy is the principal document in the LDF and contains the Council's vision and spatial strategy for the future development of the District.
Discovery Park Enterprise Zone	Discovery Park Enterprise Zone covers 82 hectares to the north of the town of Sandwich. It includes the former Pfizer complex and a number of smaller businesses to the South.
Dover Masterplan	A study which considers options and appraisal work on a series of areas within the urban area of Dover, and illustrates how they can be developed.
East Kent Health Authority (EKHA)	The EKHA manages the NHS locally by working closely with local primary care trusts and hospital trusts. Their role is to identify the health needs of local people and arrange for services to be provided by hospitals, doctors and others. It does not directly provide health services.
Employment Land	Land for office, industrial and warehousing uses (B1/B2/B8).

Term	Definition
European Designations	This includes candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation and Special Protection Areas, and is defined in regulation 8 of the Conservation of Habitats and Species Regulations 2010.
Evidence Base	The process of producing a LDF firstly requires the assembly of an evidence base. The Evidence Base consists of studies, plans and strategies produced by the Council and other organisations.
Exceptions Test	A test with three criteria, set out in National Planning Policy Framework, Flood Risk, which need to be passed before development can be considered in areas at risk of flooding.
Feasibility Study	A preliminary study undertaken to determine and document a project's viability.
Flood Risk Assessment	A detailed, site - based, investigation that is undertaken by the developer at planning application stage.
Flood Zones (1, 2 and 3)	Flood Zones indicate the probability of flooding. Flood Zone 1 has the lowest probability and Flood Zone 3 has the highest. Zones 2 and 3 are shown on the Environment Agency Flood Map with Flood Zone 1 being all the land falling outside Zones 2 and 3.
Foreground Building	Buildings that stand out from background buildings due to unusual size, features, use or function, or relationship with the street or area in which they are located. They help to create a sense of place and interest, and enable people to differentiate between areas and to orient themselves.
Greenfield Land	Land, often farmland, that has not previously been developed.
Green Infrastructure	A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.
Green Travel Plan	A package of practical measures to encourage staff and/or users of a development to choose alternatives to single occupancy car use and to reduce the need to travel.
Groundwater Source Protection Zones	Areas defined by the Environment Agency in which certain types of development are restricted/prevented in order to ensure that groundwater sources remain free from contamination/pollution.
Habitat Regulations Assessment	The need for Habitat Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by Regulation 48 of the Conservation (Natural Habitats &c) Regulations 1994 (as amended in 2007). The ultimate aim of HRA is to "maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
Hamlet	Name used in the Settlement Hierarchy in the Core Strategy to describe settlements with no facilities. Not suitable for future development.
Heritage Asset	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets (as defined in PPS 5) and assets identified by the local planning authority during the process of decision-making or through the plan-making process (including local listing).
Heritage Coast	An area identified to focus attention on managing the best stretches of undeveloped coast, where the needs of conservation, pressures of recreation and problems of pollution need to be considered in a co-ordinated way.
Heritage Strategy	This seeks to identify and understand the many heritage assets in Dover District and how their special character could contribute to the regeneration and place-making objectives in the Core Strategy. It provides advice and guidance for the management of historic assets and provides an evidence base for any funding bid opportunities that may arise in the future.
High Speed 1 (HS1)	Also known as the Channel Tunnel Rail Link (CTRL) is a 108 km (67 mile) high speed railway line running from London to Kent.
Housing Information Audit (HIA)	An annual housing land study that is undertaken to meet statutory, policy and research requirements. It is managed and co-ordinated by Kent County Council and undertaken by the Local Authorities. Information collected includes properties that have not been constructed, number of properties under construction and properties completed. The Study also phases development in the future. Studies for each District in Kent

Term	Definition
	can be viewed at, http://www.kent.gov.uk/your_council/kent_facts_and_figures/housing_and_commercial_land.aspx .
Infrastructure	Infrastructure is defined as transport (airports, ports, road network, cycling and walking infrastructure, rail network), affordable housing, education (further and higher education, secondary and primary education, nursery school), health (acute care and general hospitals, mental hospitals, health centres/primary care trusts, ambulance services), social infrastructure (supported accommodation, social and community facilities, sports centres, open spaces, parks and play space), green infrastructure (see separate definition), public services (waste management and disposal, libraries, cemeteries, emergency services, places of worship, prisons, drug treatment centres), utility services (gas supply, electricity supply, heat supply, water supply, waste water treatment, telecommunications infrastructure) and flood defences, together with any necessary management regimes to ensure efficient, effective and long-term arrangements are in place to ensure continued upkeep.
Interim Consultation Document	The Interim Consultation Document was between the public consultation held on the Preferred Option and further participation on the Land Allocations Pre-Submission Local Plan.
Kent Minerals and Waste Development Framework	A series of Plans in preparation by the County Council setting out policies to provide for the supply of minerals and for the management of waste in Kent. These will replace the previous Minerals and Waste Local Plans.
Landmark Building	Landmark buildings or structures commence or terminate a prominent view and create a strong sense of place. They are, therefore, a particular form of foreground building and can also perform the role of a focal point.
Listed Building	A building of architectural or historical importance, graded according to its importance, Graded I (highest quality), II* or II. The list is kept by English Heritage. Buildings on the list are subject to special control.
Local Centre	A name used in the settlement Hierarchy to describe settlements.
Local Development Order (LDO)	An Order made by a local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a specific development proposal or classes of development.
Local Transport Plan	A plan that sets out the local authority's transport policies and detailed investment priorities over a five year period.
National Planning Policy Framework	Planning policy guidance issued by Central Government, which has replaced Planning Policy Guidance and Planning Policy Statements.
Natura 2000	European Union governments adopted legislation designed to protect the most seriously threatened habitats and species across Europe. This legislation is called the Habitats Directive. At the heart of the Directive is the creation of a network of sites called Natura 2000. Special Protection Areas and Special Areas of Conservation make up the Natura 2000 series.
Neighbourhood Development Plan	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Outdoor Sports Facilities	This only refers to dedicated sport facilities that are suitable for competitive matches.
Primary Health Care Trust (PCT)	The local NHS organisation responsible for improving the health of their local population, providing community and primary care services and commissioning hospital and other specialist services.
Primary Shopping Frontage	The most important shopping area of a town, usually characterised by having the highest rents and pedestrian flow, where development on ground floors is primarily restricted to retailing.
Protected Open Space	Open space of various types and ownerships, the importance of which has been recognised by identification on the District's proposal map.
Public Realm	Streets and spaces which can be accessed by the public.
Ramsar Site	Wildlife sites designated under the European Ramsar Convention, 1971 to protect wetlands that are of international importance.

Term	Definition
Rapid Inundation Zone (RIZ)	An area immediately behind flood defences which, should they fail, will generate a combination of high velocities and flood depths that would cause a risk to life.
Regional Hub	South East Plan designation for logical areas within which the various components of growth will need to be focused and co-ordinated to help deliver more sustainable forms of development. They will be the focus for investment in infrastructure, economic activity and regeneration, housing and major retail and employment development.
Registered Providers (RPs)	Registered Providers supply social housing to households who are eligible for social rented housing. Registered Providers are free to undertake the delivery of other types of social housing or market housing, funded entirely from their own resources (without conversion of re-lets), without entering into an agreement with the HCA.
Rural Service Centre	Term used in the Settlement Hierarchy for the primary settlement that has the function of serving a large rural hinterland.
Scheduled Monument	A statutory designation for structures of national archaeological importance. Designated by the Government under the Ancient Monuments and Archaeological Areas Act 1979 (as amended by the National Heritage Act 1983).
Secondary Shopping Frontage	Shopping areas of secondary importance where it is desirable to restrict the use of ground floors to retailing, financial and professional services and food and drink.
Settlement Confines	The residential core of rural settlements, within which minor residential may be acceptable on suitable sites. They do not define the extent of a village, its community nor its built up area.
Settlement Hierarchy	The grading of settlements based on the number of facilities and function. For example, a town that has banks, a wide range of shops and is the base for the District local authority serving the whole district, would be at the top of the grading. A hamlet with no facilities would be at the bottom. This is used to guide future development.
Site of Nature Conservation Importance	A non-statutory area designated as being of country or regional wildlife value.
Site of Special Scientific Interest	Statutory designated site with national importance for wildlife, can relate to habitats or species of plants, birds, animals, insects etc.
Spatial Planning	Spatial planning goes beyond traditional land use planning to bring together and integrate policies for the development and use of land with other policies and programmes, which influence the nature of places and how they function.
Special Area of Conservation (SAC)	A site designated under the European Community Habitats Directive. To protect internationally important natural habitats and species.
Special Protection Areas (SPA)	Sites classified under the European Community Directive on Wild Birds to protect international bird species.
Strategic Flood Risk Assessment (SFRA)	The assessment of flood risk on a catchment-wide basis for proposed development in a District.
Strategic Housing Land Availability Assessment (SHLAA)	The Strategic Housing Land Availability Assessment's (SHLAA) primary role is to identify sites with potential for housing, identify any issues affecting the development of sites such as access problems and estimate when they are likely to come forward which may be affected by issues such as policy constraints or site conditions. The SHLAA is therefore of considerable value in being able to demonstrate that sufficient developable sites are available to deliver the Core Strategy.
Strategic Housing Market Assessment (SHMA)	SHMAs help local authorities to understand their local housing markets and assist them in developing their planning and housing policies, particularly policies for affordable housing
Sustainability Appraisal (SA)	An appraisal of the impacts of policies and proposals on economic, social and environmental issues - incorporates the Strategic Environmental Assessment.

Term	Definition
Town Centre	Area defined on the local authority's proposal map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area. References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance. Unless they are identified as centres in Local Plans, existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.
Town Frontages	The most important shopping areas in Sandwich, within which only A1, A2 and A3 uses will be acceptable (in line with saved Local Plan Policy SP9).
Urban Boundaries	The residential core of urban settlements, within which minor residential may be acceptable on suitable sites. They do not define the extent of a town, its community nor its built up area.
Use Classes	A classification of land uses for development control purposes defined by the Town and Country Planning (Use Class) Order 1987 and subsequent amended orders. Changes of use of buildings or land between uses within a single 'use class' are excluded from the definition of development in the Town and Country Planning Act 1990, thus making planning permission unnecessary. Definitions of the Use Classes can be viewed at, http://www.legislation.gov.uk/all?title=Use%20Classes%20Order
Village	Name used in the Settlement Hierarchy to describe a settlement that has facilities that serve the immediate population.
Windfall	Windfall sites are those which have not been specifically identified as available in the LDF process. They comprise previously developed sites that have unexpectedly become available, for example, a factory closure or a new flat above a shop.

Table 5.1



Appendix 7
Equality Impact Assessment of the Plan

Cabinet
1st October 2012

Land Allocations Pre-Submission Local Plan

Department Regeneration and Development	Division Regeneration Delivery	Officers involved in the assessment Adrian Fox Mary Venables
Name of the policy or service provision to be assessed: Land Allocation Pre-Submission Local Plan	Date of assessment: September 2012	Is this a new, revised or existing policy or service provision? Service provision

Overview

The Public Sector Equality Duty is designed to support decision making by ensuring public bodies consider how different people will be affected by their activities. It applies not only to public bodies themselves but also applies to anyone carrying out public functions on their behalf, such as contractors.

The duty states that they must have due regard to the need to: -

- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not.
- c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

We need to show in a consistent way, that not only have people got equal access to everything we do, but just as importantly, that we are advancing equality of opportunity for people from the protected groups.

Financial and other outside pressures mean that sometimes expensive changes can't be made, but we must be able to show that due regard has been given to people's varying needs and a make a reasonable adjustment has been considered to accommodate those needs.

1. Describe the item you are assessing and the outcomes you want from it?

This document is an Equalities Impact Assessment (EQIA) for the Land Allocations Pre-Submission Local Plan.

1302

The Core Strategy is the overarching statutory planning document for the District and was adopted by the Council in February 2010. A Customer Access review (CAR) on the Core Strategy was completed in October 2008 and Equalities Impact of submission version of Core Strategy was undertaken in June 2009 (Annex A).

The adopted Core Strategy identifies the overall economic, social and environmental objectives for the District and the amount, type and broad location of development that is needed to fulfil those objectives and identifies the overall objectives and development quantities for the district over the period to 2026.

The Land Allocations Local Plan (the Plan), which is the subject of this EQIA, is making a major contribution to delivering the adopted Core Strategy. The primary purpose of the Plan is to identify and allocate specific sites that are suitable for development in order to meet the Core Strategy's requirements. It has the same objectives and covers the same plan period as the Core Strategy.

An EQIA have been undertaken of the Plan and the accompanying Sustainability Appraisal and Habitat Regulations Assessment to enable a further period of public representation (8 weeks). After this has taken place, the Plan will be submitted to the Secretary of State and defended at the public examination; which is anticipated to take place in June/July 2013.

It must be acknowledged that equality issues could be an issue for this Plan although none are envisaged at this stage. In recognition that there could be unforeseen equality issues it is considered that EQIA should be an iterative process and any equality issues should be incorporated into a revised EQIA once the Plan has been the subject of a further period of representation.

2. Who is intended to benefit, what is the full scope of the item and who is it aimed at?

The main components of the Land Allocations Submission Local Plan are to:

- Identify and allocate specific sites that are suitable for development to meet the Adopted Core Strategy
- Provide a new policy on open space and standards
- Include guidance on Coastal Change Management Areas and Heritage Assets.

The Plan is aimed at:

- Providing local communities, landowners, developers and infrastructure providers large degree of certainty about future pattern of development in the District.
- Supporting positive action that is required in order to maintain the vibrancy of the whole district, and how the District will be made fit for the future.
- Addressing the demographics for Dover district which show that there will be an increasing proportion of older people and efforts need to be made to attract more younger people to achieve a better balance and to replace the reducing population
- Supporting an active workforce which needs to be maintained in the district and travel to work times need to be kept to a minimum
- Addressing problems in Dover which is currently at the aging extreme and the vibrancy of the town needs to be maintained through the younger section of the population

- Supporting the overall health of the district needs to be balance by an increased younger population
- Addressing the issue that there are not enough young people which means there is a risk of decreasing the school facilities in the district
- Providing all residents with an increased choice and quality of affordable and private sector housing, which will improve choices and the quality of life for most citizens.
- Supporting an increase in the number of jobs available which will benefit all residents
- Supporting local businesses will benefit from the additional potential workforce attracted to the area.
- Providing more of a focus on the biodiversity issues and open spaces will make the district a better, healthier place for all residents

3. Do the anticipated outcomes meet or hinder any other things that the authority is doing?

- The Plan is fundamental to achieving regeneration objectives that have already been identified in the Adopted Core Strategy, and is designed to enable other policies and strategies such as the Housing Strategy and Homelessness Strategy
- It will increase the ability to deliver affordable homes for sites that meet Policy DM5 in the Adopted Core Strategy, and may impact on reducing homelessness.
- The sites that have been allocated in Dover will contribute and make a positive contribution to the regeneration of Dover.
- Demographic projections show an ageing and declining population. The LDF aims to re-balance and ensure a local workforce, and also to stop school facilities being lost.

Overall the Plan fulfils the objectives, development quantities and will make a major contribution to Dover District Council's Adopted Core Strategy. No issues have been identified of the outcomes hindering delivery of other DDC services.

4. Who defined the policy, function or service provision and who are the main stakeholders?

The policy context for the Plan is the Adopted Core Strategy which was prepared and took into account the views of a wide range of views of people and organisations. The Council has a duty to prepare a Local Plan. The preparation of a Plan ensures that development is plan lead reflecting the needs of the local community as identified through consultation rather than carried out *ad hoc* basis.

The Plan has been prepared in line with the District Council's Statement of Community Involvement which identifies how hard to reach groups such as ethnic minorities, people with low literacy, working age people (who were busy during the day) and young people should be consulted along with statutory consultees. The National Planning Policy Statement includes a new duty to cooperate with neighbouring local authorities which has been undertaken as part of the preparation of the Plan and work the Council have undertaken on the Retail and Employment Update.

5. Who implements it and who is responsible for delivery?

Regeneration Delivery

6. What do you already know about people you expect to benefit or people who already benefit? What consultation have you done and how are you going to monitor feedback?

The Plan has already involved a number of opportunities for people, organisations, Town and Parish Councils and equality groups to submit comments on the contents of the Plan:

- Participation and engagement in order to identify the issues (this included workshops and public events);
- Public consultation on the Site Allocations Preferred Options Document (March 2008); and
- Public consultation the Interim Consultation Document (October 2010).
- Public consultation on the Proposed Open Space standards (November 2011)

Due to the predicted differential impact of open space policies on young people, consultations undertaken during preparation of the Open Space consultation included a workshop specifically designed to gather the views of young people.

All consultations were held for a minimum of 8 weeks to allow for any religious holidays and for discussion to take place within advocacy groups.

All the stakeholders mentioned above will have the opportunity to be involved in a further period of public representation (8 weeks) in the Autumn 2012.

7. Taking each strand of equality, is there any differential impact for anyone. Show how are you going to address the aims of the duty for each of these groups?

- a. **Race** – Community integration will be encouraged through provision of range and mix of good quality, well designed affordable and private sector housing in sites that have been allocated for development in the Plan alongside policies to help deliver sufficient amenity open space facilities, that will encourage social interaction.
- b. **Disability** – All DDC properties need to be DDA compliant. Sites that are being allocated for future development in the Plan are located within settlements that have a good range of services, facilities and public transport. The suitability of sites to accommodate future development has been assessed in relation to the proximity of the site to these services and facilities. This should help to ensure that all residents of new properties have equal chances of accessing support services. No further issues have been identified at this stage.
- c. **Gender** – No issues have been identified at this stage.
- d. **Age** – One of over-riding objectives of the Adopted Core Strategy and the Plan is to ensure that the age balance of Dover District is rebalanced. This will help to support older residents through having sufficient people of working age to provide services etc. Also this will benefit the young through supporting school rolls. Another objective is that new residential development is located within a reasonable distance of existing open space facilities including play areas. This may have an age related differential impact in that we are encouraging provision of sufficient play areas that are specifically designed for children. However as previously discussed in the EQIA that accompanied the ‘Review of Play Area Provision 2012-2026’ provision of play areas is encouraged under the Children’s Plan, because they promote safe and stimulating places for children to play.
- e. **Religion** – There are no provision for places of worship in the Plan. The Council does not presume to have a greater knowledge of the need for places of worship than residents. Should any religious group identify such a need, planning applications will be dealt with through the Development Management process in the same way as any other application. Operational cemeteries were excluded from the open space accessibility standards, even though the Core Strategy recognises that additional cemetery provision will be required to serve the Dover urban area. This is because operational churchyards exist throughout the district, some of which could be extended. However, new cemetery provision derived through planning means should be suitable for all and acceptable to all religions.
- f. **Sexual orientation** - No issues have been identified at this stage.
- g. **Gender re-assignment** - No issues have been identified at this stage.

h. **Pregnancy and Maternity** - No issues have been identified at this stage.

i. **Marriage and Civil Partnership** - No issues have been identified at this stage.

8. If there is nothing you can do about any adverse impact can the reasons be justified?

No adverse impacts have been identified at this stage.

9. If you've had to make changes because of adverse impact, have you made sure these don't have a further adverse effect on any other group?

No adverse impacts have been identified at this stage.

10. What lessons have been learnt from completing the assessment?

It has become apparent that further efforts could be made to ensure that hard-to-reach groups are sufficiently engaged with the consultation process. As a result, discussions have taken place with Community Development to ensure that a wider range of groups representing the needs of those with protected characteristics is included in the forthcoming consultation.

11. Who will be the owner of the action plan?

Regeneration Delivery

1308

Completing Officer Name Lead Officer Name

Action Plan to Remedy Areas of Concern

Description of Concern	Action Required	Date Due	Date Completed	Responsible Officer (Job Title Only)
Community Cohesion	Ensure that new development proposals when they come forward for development support community cohesion.			Principal Planner
Reach more representatives from protected groups	Talk to Community Support Team			Principal Planner
	Further consultation			Principal Planner

1309

ANNEX A

DOVER DISTRICT COUNCIL

LOCAL DEVELOPMENT FRAMEWORK

**EQUALITIES IMPACT ASSESSMENT OF THE SUBMISSION VERSION OF
THE CORE STRATEGY**

JUNE 2009

Dover District Council Local Development Framework

This document is an Equalities Impact Assessment (EqIA) for the Core Strategy and has been prepared by the Council. The attached Proforma sets out how equality impacts have been assessed.

Context

Dover District Council completed its own Customer Access Review (CAR) on the Core Strategy in October 2008. The CAR did not reveal any fundamental issues but has made a small number of recommendations which feed into the Core Strategy. For completeness, as the wording of the District objectives in the Submission version of the Core Strategy was slightly amended, an Equality Impact Proforma that was supplied by the Planning Inspectorate, has been now been completed that reflects the current wording in the Core Strategy. These changes to the objectives in the Core Strategy have not changed the outcome of the initial CAR.

CUSTOMER ACCESS REVIEW (October 2008)

This form plays a most important role in a when developing a new policy or service provision, or when considering changes to an existing policy or service provision and the assessment process should be carried out in all cases.

Department	Division	Officers involved in the assessment:-
Forward Planning	Development and Public Protection	<ul style="list-style-type: none">• Owner<ul style="list-style-type: none">○ Mike Ebbs○ David Whittington• Equality Group Members<ul style="list-style-type: none">○ Colin cook○ Mary Venables• Others<ul style="list-style-type: none">○ Dave Robinson

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Name of the policy or service provision to be assessed:	Date of assessment:	Is this a new or existing policy or service provision?
Local Development Framework Core Strategy	20th August 2008 / 29th September 2008	New

1. Describe the aims and objectives of the policy or service provision and if it is new or existing:

To transform Dover into a leading town and regenerate the district so that economically and socially it equals or out-performs the region. The specific objectives of the LDF are:

- Foster population growth and increase the proportion of young people and those of a working age to support forecast growth in the economy
- Transform Dover town from a position of under performance to a leading role in the District and East Kent to become a destination of choice to live, work, visit, shop, and spend leisure time
- Deliver sufficient additional housing to broaden the range and improve the quality and market perception of the District's housing offer
- Address more localised needs for employment, housing and community facilities at Deal, Sandwich and the rural area
- Ensure that the local economy performs to or exceeds the County and regional averages
- Have no areas falling within the 205 of those most deprived in England
- Improve residents' skills levels closer to the County averages
- Improve ease of travel to, from and within the district for both people and freight with a wider choice of transport with improved roads, rail and public transport
- To increase the scientific and cultural value of the district's special wildlife and reduce pollution

2. Who is intended to benefit from the policy, strategy or function and in what way?

- The LDF shows the positive action that is required in order to maintain the vibrancy of the whole district, and how the district will be made fit for the future.
- The demographics for Dover district show that there will be an increasing proportion of older people and efforts need to be made to attract more younger people to achieve a better balance and to replace the reducing population
- A active workforce needs to maintained in the district and travel to work times need to be kept to a minimum
- Dover is currently at the aging extreme and the vibrancy of the town needs to be maintained through the younger section of the population
- The overall health of the district needs to be balance by an increased younger population
- If there are not enough young people there is a risk of decreasing the school facilities in the district
- All residents will benefit from increased choice and quality of affordable and private sector housing, which will improve choices and the quality of life for most citizens.
- There will be an increase in the number of jobs available which will benefit all residents
- Local businesses will benefit from the additional potential workforce attracted to the area.
- All residents will benefit from the improved rail and road public transport facilities
- A greater focus on education, skills and jobs will improve choice and quality of life for all citizens
- More focus on the biodiversity issues and open spaces will make the district a better, healthier place for all residents

3. What outcomes are wanted from this policy or service provision?

- To make Dover a better place to live, by providing a framework in which to develop economically, socially, physically and environmentally.
- Demographic projections show and ageing and declining population. The LDF aims to re-balance and ensure a local workforce, and also to stop school facilities being lost.

4. Do the anticipated outcomes meet or hinder other policies, values or objectives of the authority?

- It is fundamental to achieving regeneration objectives, and is designed to enable other policies and strategies such as the Housing Strategy and Homelessness Strategy
- It will increase the ability to deliver affordable homes, and may impact on reducing homelessness.
- It is part of the renaissance of Dover.
- Additional resources may be required to deliver the objectives such as Community Development Officers especially in the Coombe Valley and Whitfield areas. See action plan 4.1
- Transportation and Car Parking studies will need to be reflected in the LDF to ensure that any equality issues are incorporated . See action plan 4.2

5. Who defined the policy, function or service provision and who are the main stakeholders?

The whole community are stakeholders. The council defined the consultation and all residents, businesses and partners were invited to give feedback via workshops discussions and research

The Statement of Community Involvement shows how hard to reach groups were included, such as ethnic minorities, people with low literacy, working age people (who were busy during the day) and young people.

See appendix 1 for list of consultees

6. Who implements and who is responsible for this policy or service provision?

The Council as the Planning Authority will implement the LDF and will work with external partners such as English Partnerships, SEEDA and developers.

– See list at appendix 2

7. What do you already know about who uses and delivers this service?

The LDF is used by the all sectors of the public – Residents, local businesses, forward planners, Stakeholder partners, Private Sector Developers. It is intended for all and is informed by research on population design.

The LDF is available in various formats on request:

Large Print

Braille

Audio

Translated

8. What further consultation do you need to do? Please describe how you propose to proceed?

Consultation has taken place during the development of the LDF. Residents, businesses and partners were invited to give feedback via workshops discussions and research. Comments received are being considered and a recast LDF will be issued by 31 December 2008 and further consultation will take place up to 31 March 2009

Need to consult with disabled groups, and feed results of the housing market assessment in to the next revision. (See action plan 8.1 and 8.2)

9. Taking each strand of equality, have you identified any differential impact and does this adversely affect any groups in the community?

Race:-

- Projections of new people coming in to the district have informed the LDF. We need to monitor the accuracy and respond as appropriate especially the number of foreign residents. Action plan 9.1
- Community integration needs to be encouraged through the design of affordable and private sector housing estates

Disability

- All DDC properties need to be DDA compliant.
- Improved public transport should be beneficial.
- High speed broadband connections will help communication.
- New facilities at Buckland hospital will mean there is an improved Health Service provision

Gender

No issues

Age

- Lifetime homes may be an issue for the elderly (see action plan 9.2).
- The drive to attract young people will redress the expected imbalance in age groups.
- Improved higher education will help retain younger people.
- Training opportunities will be improved, which will also help retain younger people and improve training for older people.
- More schools for young families will help to retain and also attract families into the area
- Improved public transport should be beneficial.

Religion

No provision for places of worship in plans. Need for these would be expected to be identified by members of different religious communities and incorporated into the master planning process

Sexual orientation

No issues

<p>10. Please also consider any adverse impact for community cohesion and human rights?</p> <p>Residents from some areas may not be able to benefit from developments that occur in their area because housing may be too expensive or they may not have the skills to benefit from new jobs which will be created through regeneration. It is important therefore for S106 planning contributions to be utilised for training and skills for local people. (Action 10.1)</p> <p>The LDF considers the Strategic Flood Risk Assessment when allocating housing sites. The Environmental Agency Coastal Management Plan will determine the necessary flood defences required which may be perceived to be at odds with local community needs</p>
<p>11. If you found adverse impact in questions 9 and 10 on any grounds at all, can it be avoided, can we make changes, and can we lessen it? (If not move to the action plan)</p> <p>Monitor the community profile to ensure that significant changes in equality groups are determined and incorporated into the delivery plans</p>
<p>12. If there is nothing you can do about any adverse impact highlighted in question 11, can the reasons be justified?</p> <p>None</p>
<p>13. If you found adverse impact in Q11, have you considered proportionate and justifiable measures to mitigate it, or have you considered alternative policies that might better achieve the promotion of equality of opportunity?</p> <p>N/A</p>
<p>14. If you've had to make changes because of adverse impact found in Q11, have you made sure these don't have a further adverse effect on any other group?</p> <p>N/A</p>
<p>15. If you found adverse impact in Q11, can it be justified on the grounds of promoting equality of opportunity for any groups?</p> <p>N/A</p>

<p>16. What lessons have been learnt from completing the assessment?</p> <p>Future planning should consider the six equality strands at an early stage.</p>
<p>17. Who will be the owner of the action plan?</p> <p>Mike Ebbs</p>

Signed (completing Officer)..... Signed (Owner)

Action Plan to Remedy Areas of Concern

Function	Description of Concern	Action Required	Date Due	Responsible Officer (Job Title Only)
4.1 Community Cohesion	Adverse effect on existing communities. See section 4	Additional resource and funding for post to be identified, especially in Coombe Valley and Whitfield when development commences. Planning policy needs to reflect need for support.		Mike ebbs Mike Ebbs
4.2	Links with Transportation and Car Parking Strategies	Check for conflicts.		Mike Ebbs
8.1 & 8.2 Further research	See section 8	Results of Housing Market Survey to be taken into consideration Review groups initially consulted to make sure that people with disabilities were adequately included.		Mike ebbs Mike Ebbs
9.1	Projections of new people coming in to the district have informed the LDF.	Monitor the accuracy of population projections and respond as appropriate.		Mike Ebbs
9.2	Lack of lifetime homes	Review the projections of elderly people to see if		Mike Ebbs

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		action required.		
10.1	Residents from deprived areas may not be able to benefit from regeneration plans	S106 contributions used for local skills training as a priority		Mike Ebbs