

Appendix C

Site Assessment Criteria and Assumptions

Table C.1: Residential site assessment criteria and assumptions

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring	
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	All site options with the potential to deliver homes within the Plan period have the potential for positive effects on SA Objective 1.						A minor positive (+) is therefore recorded for all site options.	
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	2a – Access to local services and facilities	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	<p>Each criterion 2a to 2h is scored:</p> <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 <p>Scores totalled, and then averaged (i.e. total score divided by 8). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
		2b Open space, sport, recreation, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility, open country and registered common land OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility, open country and registered common land OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
		2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
		2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m ¹ from primary or middle school	>1,200m from primary or middle school	
		2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
		2f Further and higher education facilities	<=500m further and higher education facilities	501-1,000m further and higher education facilities	N/A	1,001-2,000m further and higher education facilities	>2,000m further and higher education facilities	
		2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2,000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
		2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ² from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and wellbeing	2i AQMAs	N/A	N/A	All other sites	Site located within 500m of an AQMA (The World Health Organisation's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO ₂ has a gradient of 200-500m)	Site located within AQMA	<p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 2j to 2l score minor negative, then the score is significant negative.</p> <p>If only one criterion 2j to 2l scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>
		2j Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry	

¹ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

² This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2k Exposure to noise pollution from roads and railways	N/A	N/A	All other sites	Lnight 50.0-54.9 dB, or Laeq,16 55.0-59.9 dB	Lnight >=55.0 dB, or Laeq,16 >= 60.0 dB	
	2l Exposure to odour from waste facilities	N/A	N/A	All other sites	N/A	<400m to wastewater treatment works or established safeguarding zone) <=250m to waste management facility	
SA3: To deliver and maintain sustainable and diverse employment opportunities.	All site options with the potential to deliver employment opportunities have the potential for positive effects on SA Objective 3.						A minor positive (+) is therefore recorded for all site options.
SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	<p>Each criterion 4a to 4b and 2a to 2h is scored:</p> <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 <p>Scores totalled, and then averaged (i.e. total score divided by 10). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m ³ from primary or middle school	>1,200m from primary or middle school	
	2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
	2f Further and higher education facilities	<=500m from further and higher education facilities	501-1,000m from further and higher education facilities	N/A	1,001-2,000m from further and higher education facilities	>2,000m from further and higher education facilities	
	2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2,000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ⁴ from town centre	>1,200m from town centre		
SA5: To promote sustainable forms of development that maintain and improve	5a Source Protection Zones	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	If any of the criteria score major negative then the score is significant negative.

³ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

⁴ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
the quality of the District's natural resources, including minerals, soils and waters.	5b Agricultural land classification	N/A	N/A	All other sites	Significant proportion (>=25%) of site on Grade 3 agricultural land AND/OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site	Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land	If two or more of criteria 5a to 5c score minor negative, then the score is significant negative. If only one criterion 5a to 5c scores minor negative, then the score is minor negative. All other sites score negligible (0).
	5c Minerals Safeguarding Area	N/A	N/A	All other sites	Site is within a Minerals Safeguarding Area	N/A	
SA6: To reduce air pollution and ensure air quality continues to improve.	The proximity of sites to Air Quality Management Areas (AQMAs) does not appropriately test the potential for such sites to generate road traffic through AQMAs. Furthermore, in isolation, individual sites options are likely to generate relatively minor effects on air quality. It is considered more appropriate to appraise the Plan's ability to reduce air quality over the Plan Period in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan's site allocations as a whole. The Council's Air Quality Study undertaken by Bureau Veritas (2020) identifies and assesses the likely effects of selected sites on the District's NO ₂ or PM ₁₀ levels. A handful of sites were found to have the potential to generate slight or moderate increases in NO ₂ or PM ₁₀ although, overall, the impact on local air quality conditions arising from increased traffic flows as a result of the implementation of the Local Development Plan can be described as not significant with regards to human receptors.						All sites score a negligible uncertain effect against this objective (0?) at this stage.
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change. ⁵	7a Intersection with flood risk areas	N/A	N/A	All other sites	>=25% of site within Flood Zone 2	>=25% of site within Flood Zone 3	A major negative scores a significant negative effect (-). If two or more of criteria 7a to 7b score minor negative, then the score is significant negative. If only one criterion 7a to 7b scores minor negative, then the score is minor negative. All other sites score negligible (0).
	7b Intersection with surface water flooding areas	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion 4a to 4b and 2a to 2h is scored: <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 10). Overall significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of 25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Primary and middle schools	<=400m from primary or middle school	401-800m from primary or middle school	N/A	801-1,200m ⁶ from primary or middle school	>1,200m from primary or middle school	

⁵ Dover District Council's Level 1 Strategic Flood Risk Assessment (2019) refers to flood risk areas, including areas at risk from surface water flooding and flooding from reservoirs. LUC has reviewed the flood risk from reservoirs data, which has no effect on any of the reasonable alternative site options.

⁶ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2e Secondary schools	<=500m from secondary school	501-1,000m from secondary school	N/A	1,001-2,000m from secondary school	>2,000m from secondary school	
	2f Further and higher education facilities	<=500m from further and higher education facilities	501-1,000m from further and higher education facilities	N/A	1,001-2,000m from further and higher education facilities	>2,000m from further and higher education facilities	
	2g Centres of employment	<=500m from Strategic Employment Site/Enterprise Zone	501-1,000m from Strategic Employment Site/Enterprise Zone	N/A	1,001-2000m from Strategic Employment Site/Enterprise Zone	>2,000m from Strategic Employment Site/Enterprise Zone	
	2h Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ⁷ from town centre	>1,200m from town centre	
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	9a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'all planning applications', 'residential' or 'rural residential' IRZ. The 'residential' and 'rural residential' IRZs use the following unit categories to establish relevance of IRZ: <ul style="list-style-type: none"> ■ 500+ ■ 100+ ■ 50+ ■ 10+ Using the density assumption of 30dph, only sites capable of accommodating units equal to or more than these categories rate light red.	Intersects with designated site	If any of the criteria score major negative then the score is significant negative. If two or more of criteria 9a to 9d score minor negative, then the score is significant negative. If only one criterion 9a to 9d scores minor negative, then the score is minor negative. All other sites score negligible (0).
	9b Proximity to locally designated wildlife sites and ancient woodland			All other sites	<=250m from designated site boundary	Intersects with designated site	
	9c Presence of Proximity Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat			All other sites	Intersects with habitat	N/A	
	9d Presence of geological sites	N/A	N/A	All other sites	<=25% intersects with county/local geological site	>=25% intersects with county/local geological site	
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	HELAA Historic Environment Assessment covering nationally and locally designated and non-designated heritage assets	N/A	N/A	Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in	A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/ or, where assets of low significance	A significant negative effect occurs where, as result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change.	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment.

⁷ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
				which it is perceived or understood.	may experience physical or setting change, resulting in any degree of effect (minor to significant).		
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	HELAA Landscape Environment Assessment Landscape Sensitivity	N/A	N/A	Site is of low landscape sensitivity	Site is of moderate or low-moderate landscape sensitivity	Site is of high or moderate-high landscape sensitivity	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment.

Table C.2: Employment site assessment criteria and assumptions

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring	
SA1: To help ensure that everyone has the opportunity to live in a decent, sustainable and affordable home.	All employment site options will have a negligible (0) effects on SA Objective 1.						A negligible (0) is therefore recorded for all site options.	
SA2: To reduce inequality, poverty and social exclusion by improving access to local services and facilities that promote prosperity, health, wellbeing, recreation and integration.	2a – Access to local services and facilities	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	Each criterion 2a to 2d is scored: <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 4). Overall significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
		2b Open space, sport, recreation, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport, recreation facility, open country and registered common land OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport, recreation facility, open country and registered common land OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
		2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
		2d Primary and middle schools	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ⁸ from town centre	>1,200m from town centre	
	2b – Proximity to environs affecting health and wellbeing	2f AQMA	N/A	N/A	All other sites	Site located within 500m of an AQMA (The World Health Organisation's (WHO) Review of Evidence on Health Aspects of Air Pollution Project suggests that NO ₂ has a gradient of 200-500m)	Site located within AQMA	
	2g Intersection with Coal Authority mine entries	N/A	N/A	All other sites	N/A	Within 20m of a recorded mine entry		

⁸ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	2h Exposure to odour from waste facilities	N/A	N/A	All other sites	N/A	<400m to wastewater treatment works or established safeguarding zone) <=250m to waste management facility	
SA3: To deliver and maintain sustainable and diverse employment opportunities.	All site options with the potential to deliver employment opportunities have the potential for positive effects on SA Objective 3.						A minor positive (+) is therefore recorded for all site options.
SA4: To reduce the need to travel and encourage sustainable and active alternatives to road vehicles to reduce congestion.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	<p>Each criterion 4a to 4b and 2a to 2d is scored:</p> <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 <p>Scores totalled, and then averaged (i.e. total score divided by 6). Overall significance is scored as follows:</p> <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Town centres	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ⁹ from town centre	>1,200m from town centre	
SA5: To promote sustainable forms of development that maintain and improve the quality of the District's natural resources, including minerals, soils and waters.	5a Source Protection Zones	N/A	N/A	All other sites	Site falls within a Source Protection Zone 2 or 3	Site falls within a Source Protection Zone 1	<p>If any of the criteria score major negative then the score is significant negative.</p> <p>If two or more of criteria 5a to 5c score minor negative, then the score is significant negative.</p> <p>If only one criterion 5a to 5c scores minor negative, then the score is minor negative.</p> <p>All other sites score negligible (0).</p>
	5b Agricultural land classification	N/A	N/A	All other sites	Significant proportion (>=25%) of site on Grade 3 agricultural land AND/OR Site consists partly of Grades 1 and/or 2 agricultural land, but less than 25% of site.	Significant proportion (>=25%) of site on Grade 1 or 2 agricultural land	
	5c Minerals Safeguarding Area	N/A	N/A	All other sites	Site is within a Minerals Safeguarding Area	N/A	
SA6: To reduce air pollution and ensure air quality continues to improve.	The proximity of sites to Air Quality Management Areas (AQMAs) does not appropriately test the potential for such sites to generate road traffic through AQMAs. Furthermore, in isolation, individual sites options are likely to generate relatively minor effects on air quality. It is considered more appropriate to appraise the Plan's ability to reduce air quality over the Plan Period in the SA Report as part of the appraisal of strategic planning policies and the cumulative effects of the Plan's site allocations as a whole.						All sites score a negligible uncertain effect against this objective (0?) at this stage.

⁹ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
	The Council's Air Quality Study undertaken by Bureau Veritas (2020) identifies and assesses the likely effects of selected sites on the District's NO ₂ or PM ₁₀ levels. A handful of sites were found to have the potential to generate slight or moderate increases in NO ₂ or PM ₁₀ , although, overall, the impact on local air quality conditions arising from increased traffic flows as a result of the implementation of the Local Development Plan can be described as not significant with regards to human receptors.						
SA7: To avoid and mitigate flood risk and adapt to the effects of climate change.	7a Intersection with flood risk areas	N/A	N/A	All other sites	>=25% of site within Flood Zone 2	>=25% of site within Flood Zone 3	A major negative scores a significant negative effect (--). If two or more of criteria 7a to 7b score minor negative, then the score is significant negative. If only one criterion 7a to 7b scores minor negative, then the score is minor negative. All other sites score negligible (0).
	7b Intersection with surface water flooding areas	N/A	N/A	All other sites	Contains land with a 1 in 100 year risk of surface water flooding	Contains land with a 1 in 30 year risk of surface water flooding	
SA8: To mitigate climate change by actively reducing greenhouse gas emissions.	4a Rail	<=500m of a railway station	501-1,000m of a railway station	N/A	1,001-2,000m of a railway station	>2,000m of a railway station	Each criterion 4a to 4b and 2a to 2d is scored: <ul style="list-style-type: none"> ■ Significant positive +3 ■ Minor positive +1 ■ Minor negative -1 ■ Significant negative -3 Scores totalled, and then averaged (i.e. total score divided by 6). Overall significance is scored as follows: <ul style="list-style-type: none"> ■ Significant positive >= +2 ■ Minor positive >0 to <2 ■ Negligible 0 ■ Minor negative <0 to <-2 ■ Significant negative >= -2
	4b Bus	<=300m of a bus stop	301-600m of a bus stop	N/A	601-1,000m of a bus stop	>1,000m of a bus stop	
	2a GP surgeries	<=400m from nearest NHS GP surgery	401-800m from nearest NHS GP surgery	N/A	801-1,200m from nearest NHS GP surgery	>1,200m from nearest NHS GP surgery	
	2b Open space, sport, recreation facilities, open country and registered common land	<=300m from open space, sport, recreation facility, open country and registered common land	301-800m from open space, sport, recreation facility, open country and registered common land	N/A	801-1,200m from open space, sport and recreation facility OR Loss of <25% open space, sport, recreation facility, open country and registered common land	>1,200m from open space, sport and recreation facility OR Loss of >=25% open space, sport, recreation facility, open country and registered common land	
	2c Public Rights of Way (PRoW)/Cycle Paths	<=200m from PRoW/Cycle Paths	201-400m from PRoW/Cycle Paths	N/A	401-800m from PRoW/Cycle Paths	>800m from PRoW/Cycle Paths	
	2d Town centre	<=400m from town centre	401-800m from town centre	N/A	801-1,200m ¹⁰ from town centre	>1,200m from town centre	
SA9: To conserve, connect and enhance the District's wildlife habitats and species.	9a Internationally and nationally designated biodiversity assets	N/A	N/A	All other sites	Intersects with 'rural non-residential', 'air pollution' and 'water supply' or 'all planning applications' IRZ	Intersects with designated site	If any of the criteria score major negative then the score is significant negative. If two or more of criteria 9a to 9d score minor negative, then the score is significant negative. If only one criterion 9a to 9d scores minor negative, then the score is minor negative. All other sites score negligible (0).
	9b Proximity to locally designated wildlife sites and ancient woodland			All other sites	<=250m from designated site boundary	Intersects with designated site	
	9c Presence of Proximity Habitat Inventory (PHI) or local Biodiversity Action Plan (BAP) habitat			All other sites	Intersects with habitat	N/A	
	9d Presence of geological sites	N/A	N/A	All other sites	<=25% intersects with county/local geological site	>=25% intersects with county/local geological site	

¹⁰ This figure was incorrectly recorded as 1,201m in the previous iteration of the SA.

SA Objective	Criteria	Dark Green	Light Green	Negligible (0)	Light Red	Dark Red	Significance Scoring
SA10: To conserve and/or enhance the significant qualities, fabric, setting and accessibility of the District's historic environment.	HELAA Historic Environment Assessment covering nationally and locally designated and non-designated heritage assets	N/A	N/A	Development would not physically change any designated or non-designated heritage assets and would conserve their setting, resulting in no material change to the heritage asset's significance, or the way in which it is perceived or understood	A minor negative effect occurs where allocation has the potential to cause minor effects to assets of high or medium significance as a consequence of setting change; and/or, where assets of low significance may experience physical or setting change, resulting in any degree of effect (minor to significant)	A significant negative effect occurs where, as a result of allocation, assets of medium or high significance are subject to a significant degree of effect, via setting or physical change	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment
SA11: To conserve and enhance the special qualities, accessibility, local character and distinctiveness of the District's settlements, coastline and countryside.	HELAA Landscape Environment Assessment Landscape Sensitivity	N/A	N/A	Site is of low landscape sensitivity	Site is of moderate or low moderate landscape sensitivity	Site is of high or moderate-high landscape sensitivity	Scoring of significance will match the scoring of major, minor and negligible effects in the HELAA assessment

Appendix D

Reasons for the Selection of Sites in Light of the Reasonable Alternatives



The Selection of Site Allocations for the Regulation 19 Submission Local Plan September 2022



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The Selection of Site Allocations for the Regulation 19 Submission Local Plan

The purpose of this Topic Paper is to set out the background to the selection of the proposed housing, gypsy and traveller pitches and employment site allocations for the Regulation 19 Local Plan.

It provides an update to the Topic Paper that was published with the Regulation 18 Draft Local Plan (Appendix 1), which set out the reasoning behind the selection of specific site options within the District. It should be read in conjunction with the previous Topic Paper.

Overarching Growth Strategy

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

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

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

The SA identified and appraised five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations):

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and Economic Land Review).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

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

However, given the environmental constraints that exist around Deal and Sandwich, very few suitable and potentially suitable sites have been identified in these towns. Given this, the council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing

and economic growth in the District is therefore primarily based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

Sites have therefore been selected in accordance with the preferred option for the distribution of housing and economic growth, based on their suitability, availability, and achievability.

Settlement Hierarchy

To support the consideration of the Growth Options through the Sustainability Appraisal process a review of the Settlement Hierarchy was undertaken.

The purpose of the Settlement Hierarchy Study was to identify those settlements in the District that are the most sustainable, based on the range of facilities and services present. It focuses in particular on the rural settlements of the District, given that the sustainability credentials of the district's three main centres of Dover, Deal and Sandwich are well-established.

The NPPF and NPPG require that Local Planning Authorities promote sustainable development in rural areas to support the vitality of their rural communities. New housing can enable rural communities to retain their existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

The continued national policy emphasis on sustainable development means that housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich, with new development in the rural areas limited and focused on villages commensurate with their scale and position in the hierarchy, unless local factors, including flood risk and environmental designations, dictate otherwise. As the Settlement Hierarchy Study and its predecessor have established, Dover District has a large number of smaller settlements distributed across the rural areas of the District, with only a small number of larger villages. The Settlement Hierarchy Study indicates that it is therefore appropriate that the distribution of new housing in the rural areas of the district reflects such a settlement pattern.

The Council has used the Settlement Hierarchy Study to inform the proposed site allocations for the Local Plan and determine how much development an individual settlement should accommodate based on its position in the revised Settlement Hierarchy.

Housing Sites

Identification and Assessment of Housing Sites

The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The HELAA has been prepared in accordance with the guidance set out in the Government's Planning Practice Guidance <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

As part of the HELAA process officers compiled a comprehensive list of housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in sites being removed.

The remaining sites were then taken forward for more detailed assessment. The first stage of this process involved a desktop review using GIS to identify any relevant on-site constraints. Following this, sites were then physically surveyed and assessed to determine their suitability and development potential (i.e number of houses that could be delivered on the site) using the following criteria:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

In addition to this, comments were also sought from key stakeholders (including KCC Highways, DDC Heritage Officer, Landscape Architect, Environment Agency and the Kent Downs AONB Unit) with regards to the suitability of some of the sites.

Ward Councillors were consulted in 2019, following which a series of meetings were held with Town and Parish Councils in February/March 2020. The draft HELAA was published on the Council's website in April 2020. This concluded that there were 126 suitable or potentially suitable and available or potentially available sites, with a capacity to accommodate 12,111 dwellings.

The draft HELAA (April 2020) was subsequently updated to take account of:

- Further evidence requested by officers in relation to highways constraints identified on certain sites;
- New availability evidence;
- Viability evidence in respect of achievability;
- Comments made as part of the wider engagement on the HELAA sites;
- Sites which now have planning permission.

December 2020 HELAA

The December 2020 HELAA was then published in January 2021 alongside the Reg 18 draft Local Plan and identified:

- 93 sites as suitable¹;
- 41 sites as potentially suitable²; and

¹ Suitable is defined in the HELAA as: *'site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.'*

² Potentially suitable is defined in the HELAA as: *'site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.'*

- 197 sites as unsuitable³.

The 134 suitable and potentially sites had capacity to accommodate in the region of 13,654 dwellings based upon assessment carried out at that time.

The availability assessment of the suitable and potentially suitable sites identified:

- 114 sites as available⁴;
- 12 sites as potentially available⁵; and
- 8 sites as unavailable⁶.

Reg 18 Targeted Call for Sites

A targeted call for sites was undertaken alongside the consultation on the Regulation 18 draft Local Plan. As part of this exercise the following types of site were requested:

- Gypsy and Travellers and Travelling Show-people
- Self-build and Customhouse Building (0.25ha size or 5 units or more)
- Employment Use (500sqm floor space or more)
- Housing sites between 0.25 and 1 hectare in size
- Local Green Space nominations

120 sites were submitted for consideration. These sites were then subject to a stage 1 desk based assessment in accordance with the methodology outlined above, which led to 68 sites being eliminated. The 3 Local Green Spaces submitted as part of the call for sites were sifted out and considered separately.

Of the 49 sites taken forward to Stage 2:

- 36 sites were either housing or self-build sites;
- 5 sites were Gypsy and Traveller sites;
- 6 sites were employment sites; and
- 2 sites (TC4S083 and TC4S100) were submitted for mixed use and have therefore been considered as part of the assessment of housing sites and part of the assessment of employment sites.

Officers then undertook a suitability assessment of the 36 housing/ self-build and 2 mixed use sites (TC4S083 and TC4S100) sites taken forward to stage 2 based on the methodology set out above.

³ Unsuitable is defined in the HELAA as: *'site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.'*

⁴ Available is defined in the HELAA as: *'landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.'*

⁵ Potentially available is defined in the HELAA as: *'Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.'*

⁶ Unavailable is defined in the HELAA as: *'The landowner/ site promoter has confirmed that the land is not available for development in the next 15-20 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.'*

Further engagement was also undertaken with KCC Highways, The Kent Downs AONB Unit, the Council's Heritage Officer, the EA and Natural England where further clarification was required concerning on or off-site constraints.

The suitability assessment of the sites identified:

- 12 housing sites as suitable;
- 4 housing sites and 1 mixed use site (TC4S083) as potentially suitable for housing; and
- 20 housing sites and 1 mixed use site (TC4S100) as unsuitable for housing.

Sites assessed as being suitable or potentially suitable were then subject to an availability and achievability assessment in accordance with the HELAA methodology. This concluded that the 16 housing sites and 1 mixed use site (TC4S083) were available, 10 housing sites were achievable, 2 housing sites and 1 mixed use site (TC4S083) were marginally achievable and the 4 Dover housing sites were unachievable.

Reg 18 responses to draft Local Plan and HELAA December 2021

As part of the Regulation 18 consultation, representations were also made on both the proposed site allocations identified in the Plan and on existing HELAA sites not proposed as allocations in the draft Local Plan. The Council's response to these comments is reported in the Local Plan Consultation Statement.

Reg 19 HELAA September 2022

The HELAA has been updated to take account of:

- Representations made through the Regulation 18 consultation on the draft Local Plan;
- Sites which now have planning permission or resolution to grant subject to S106;
- Changes to the capacity of sites;
- Further technical work;
- Further engagement with key stakeholders; and
- Further site assessment work.

Since the HELAA was published in January 2021, 1 site SHE013 has changed from being deleted to being included and this results in 365 sites within the existing HELAA. Of the 365 sites, 46 have gained planning permission or are subject to permission and are awaiting completions of a S106 legal agreement and 5 are allocated in the Ash Neighbourhood Plan made by the Council in September 2021. Of the remaining 314 sites the follow assessments apply:

Suitability Assessment:

- 72 sites are suitable
- 11 sites are potentially suitable
- 223 sites are unsuitable
- 8 sites have mixed suitability

Availability Assessment

Of the 91 sites that are part suitable or suitable and are part potentially suitable or potentially suitable:

- 80 sites are available
- 11 sites are unavailable

Achievability Assessment

Of the 80 sites that were part suitable or suitable and are part potentially suitable or potentially suitable and are available:

- 58 sites achievable
- 8 sites marginally achievable
- 14 sites unachievable

The 14 sites assessed as unachievable are within the Dover urban area. Review of these sites has determined that development would facilitate needed regeneration and by removing the policy requirement for 30% of dwelling to be affordable would allow the sites to become achievable.

Further details of the HELAA process can be found in the Council's HELAA Report September 2022.

Site Specific Sustainability Appraisal of Housing Sites

As part of the Sustainability Appraisal of the Regulation 18 draft Local Plan, site specific Sustainability Appraisal assessments were carried out on the 126 HELAA sites that were assessed as being suitable or potentially suitable and available or potentially available. In addition to this, a further 8 sites were also subjected to SA alongside the other 126 sites on a precautionary basis. These were sites where the Council had been unable to contact the landowners to confirm their availability before the SA work was carried out.

Following the Regulation 18 consultation on the draft Local Plan further site specific Sustainability Appraisals were carried out on the suitable and potentially suitable sites assessed as part of the targeted call for sites and three HELAA sites that previously hadn't been subject to SA as they were unsuitable.

Each residential site option was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal (see Sustainability Appraisal Report). To ensure that all site options were appraised to the same level of detail in the SA, all options have been appraised at a high level based on the potential capacity of each site using each sites redline boundary and the Council's most up-to-date evidence base.

The Sustainability Appraisal then organised the sites by settlement, with the strongest site options at the top and the weaker performing site options at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects

Where the status of HELAA sites has changed through the process the SA has been updated to reflect this. Sites which either now have planning permission or are now considered to either be unsuitable or unavailable no longer constitute reasonable alternatives for the Local Plan to consider for site allocation purposes. Sites that had boundary changes and amendments to them were considered as reasonable alternatives were subject to SA. The preferred site boundary alternatives and their reasoning have been set out within Appendix B.

Whilst the SA has informed the site allocation selection, the overall 'score' from the Sustainability Appraisal process was not the only determining factor (see below). This is due to a number of reasons. First, its not possible in the SA to compare scoring in different areas of the District, for example the towns, which score highly on access to services, to sites in rural settlements with more limited access. This inevitable lower score should not in itself mean that a site in a rural location is

not 'suitable' for allocation. Therefore sites with lower scores than other 'reasonable alternatives' in a different settlement may have been allocated. If site score alone was the determining factor in site allocation this would result in allocations in a very limited range of locations.

Second, when considering the cumulative impact of development and the overall distribution of allocations across the District, a site with a positive score in the SA may be located in a rural settlement which already has a number of other highly scoring 'suitable' sites, and the Council considers that it would not be sustainable to allocate all of them in one plan period due to the negative impact of cumulative development on the particular settlement. In another scenario, sites may score more positively than a selected allocation, but the allocation of them would not be in accordance with the overall distribution strategy of the Local Plan set out in SP3.

Third, the site specific Sustainability Appraisal work identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA against SA objectives 5 (Air Pollution), 7 and (Flood Risk) and 9 (Biodiversity) through the policies in the Plan.

Site Selection for Allocation

In order to meet the level of identified housing need, the Local Plan is required to allocate sites for housing to meet the residual housing requirement of 4,666 homes over the Plan period to 2040.

In determining the sites to be taken forward as housing allocations in the Local Plan the Council has had regard to:

- HELAA technical evidence and site assessments
- The overarching growth strategy set out in the Local Plan
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan
- Housing need and supply
- The revised settlement hierarchy
- The planning status of a site
- The availability of a site
- The Whole Plan Viability Study
- The Air Quality Study
- Sequential and Assessment Test of the proposed allocations
- The Local Plan Transport Modelling Work; and
- Representations made by key stakeholders, site promoters and the local community.

Proposed Regulation 18 Housing Allocations

The Regulation 18 Local Plan identified sites to deliver 7,511 new homes over the Plan period, of which 3,690 homes were proposed on strategic sites and 3,821 were proposed on non-strategic housing sites.

Strategic housing allocations included:

- The urban expansion of Whitfield;
- Land to the North of Aylesham;

- Land to the South of Aylesham;
- Land between Elvington and Eythorne

A number of non-strategic allocations were also proposed in Site Allocations Policy 1 of the draft Regulations 18 Local Plan.

The justification for the inclusion of these sites as proposed housing allocations, and conversely the exclusion of others, was set out in Appendix E of the SA of the draft Reg 18 Local Plan and the Site Selection Topic Paper that was published to support the Regulation 18 Local Plan (Appendix A).

The proposed housing allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, further information was also requested from land owners/ site promoters of the proposed allocations to demonstrate the sites deliverability. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

Proposed Regulation 19 Housing Allocations

The Strategic and Non-Strategic housing allocations in the Regulation 19 Local Plan have been updated following the Regulation 18 consultation to take into account:

- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process.
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites – to take into account changes to the planning status of a site; changes in suitability following re-assessment and changes in availability of sites;
- Further site specific SA work;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding, sequential test of sites and minerals assessment work.

This has resulted in the following sites being removed from the Regulation 19 Local Plan:

- AYL004 – North Aylesham. Site proposed for 500 homes. Removed due to concerns in relation to the cumulative impact upon the highways network. The AYL003 site is considered to be the best option to deliver the further expansion to Aylesham due to its relationship with the existing settlement, proximity to transport connections and services and facilities, and the development is considered to have a lesser impact on the amenity of existing residents, in addition to a lesser landscape and visual impact.
- DOV012 – Farthingloe. Site proposed for 100 homes. Site removed due to objections from AONB unit and Natural England. No clear mitigation or justification has been provided for major development in the AONB.
- DOV025 - Land off Wycherley Crescent Dover. Site proposed for 10 homes. Previous Local Plan allocation. Site is a designated Local Wildlife Site and has been removed as impact cannot be mitigated.
- EAS012 – Lower Gore Field Eastry. Site proposed for 35 homes. Site is no longer available for housing.
- EYT019 – Land to east of Adelaide Road, Eythorne. Site proposed for 6 homes. Removed as it will form part of the access to the strategic allocation in Elvington.

- SHE003 - Land to the north of Westcourt Lane, Shepherdswell. Site proposed for 100 homes. Removed due to highway safety concerns raised by KCC highways and significant objections to scale and impact of development at Regulation 18 stage.
- WHI006 – Former Guide Hut, Whitfield. Site proposed for 10 homes. Site removed as no longer available for housing.
- EYT001 – Land at Monkton Court Lane. Site proposed for 20 units. Site covered by a surface water flow path which constrains development here.

The following sites have also been removed as they are now subject to planning permission or resolution to grant. These sites still contribute to meeting the Plan’s housing requirement, being part of the extant supply.

- ASH010
- AYL002
- DEA018
- DEA020
- DEA021
- DOV009
- EAS011
- GUS002
- NOR005
- SAN015
- SHO004
- SHO002 (part of the site has planning permission, the remainder of the site is unsuitable as therefore not considered for allocation)
- STA009
- WOO002

All the site allocations in Ash have been removed from Regulation 19 Local Plan as they are covered by the Ash Neighbourhood Plan which was adopted in September 2021, which includes these site allocations. This includes ASH003, ASH004, ASH011, ASH014, ASH015.

The following sites remain as allocations in the Regulation 19 Local Plan, however their capacity has been amended to take into account comments made at Regulation 18 stage and updated site assessments and evidence.

Site Reference	Address	Reg 18 Housing Number	Reg 19 Housing Number	Reason for Change
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	18	10	To mitigate the impact upon the AONB
CAP013	Land at Cauldham Lane, Capel-le-Ferne	15	5	To mitigate the impact upon the AONB
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	100	75	To enable a scheme to come forward which reflects the character of the surrounding area, and enable sufficient landscaping to be provided

DOV017	Dover Waterfront	200	263	To reflect the current masterplan for the site
DOV022B	Land including gas holder, Coombe Valley, Dover	40	80	To reflect the landowners aspirations for the site, and additional adjoining land
DOV022E	Land in Coombe Valley, Dover	220	150	To mitigate visual and landscape impacts
DOV023	Buckland Mill, Dover	124	135	To reflect current planning application for the site
DOV026	Westmount College, Folkestone Road, Dover	100	60	To reflect the landowners aspirations for the site
EYT003/009/012	Land between Eythorne and Elvington	350	300	To reduce the cumulative impact on the highways network
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	90	50	To mitigate visual and landscape impact on the AONB.
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	65	30	To take into account the area of the site at risk from surface water flooding
PRE003	Apple Tree Farm, Stourmouth Road	12	5	To reflect the landowners aspirations for the site
PRE016	Site north of Discovery Drive, Preston	35	20	
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	75	40	
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	80	35	To reflect the landowners aspirations for the site
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	60	40	To take into account the area of site at risk from surface water flooding
SAN023	Land at Archers Low Farm, St George's Rd	40	35	To mitigate the impact on adjacent trees and wider landscape
SHE006	Land west of Coxhill Road, Shepherdswell	20	10	To take into account the area of site at risk from surface water flooding
WIN014	Footpath Field, Staple Rd, Wingham	50	75	Following further assessment of potential site capacity
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	20	15	To reflect the landowners aspirations for the site

The following sites have been added as new housing allocations in the Regulation 19 Local Plan, following the Targeted Call for Sites undertaken at Regulation 18 and the review of existing HELAA sites based on comments made at Regulation 18.

Site Reference	Address	Settlement	Capacity	Reason for Allocation
DOV017	Bench Street, Dover Town Centre	Dover	100	Site forms part of the current Dover Waterfront site allocation in the Land Allocations Local Plan (2015). Site identified in the Regulation 18 Draft Local Plan as a development opportunity in the Dover Town Centre policy. A site allocation policy is however required to take forward the regeneration of this site.
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	40	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where criteria are set out in the site allocations policies these will need to be addressed as part of the planning application process. Development of the site provides the opportunity to enhance the Scheduled Monument. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA in relation to the Thanet Coast and Sandwich Bay. This mitigation should be delivered in accordance with the relevant policies in the Plan.
STM010	Land located between Salisbury Road and The Droeway, St Margarets-at- Cliffe	St Margaret's	10	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.

RIN002	Land at Ringwould Alpines, Dover Road, Ringwould	Ringwould	5	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.
TC4S008	Bridleway Riding School, Station Road Deal	Deal	25	Site accords with the Local Plan growth strategy and will contribute to meeting the District's housing need over the Plan period. Where key considerations are set out in the site allocations policies these will need to be addressed as part of the planning application process. There is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA.
SHE013	Land around Coldred	Dover	5	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S074	Land adjacent Courtlands, Kingsdown	Kingsdown	5	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S082	Land Adjacent Mill House, Shepherdswell	Shepherdswell	10	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S023	Land adjacent to Cross Farm, Eastry, Near Sandwich	Eastry	10	Small site. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S027	Roosevelt Road, Dover	Dover	10	Small site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to

				accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S047	104 Northwall Road, Deal	Deal	8	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S039	Chapel Hill, Eythorne	Eythorne	5	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S030	Colton Crescent, Dover	Dover	10	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S028	Peverell Road, Dover	Dover	6	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
TC4S026	Military Road, Dover	Dover	9	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.
Part of DOV012	Western Heights	Dover	100	Regeneration of site is needed to secure the future of this important heritage asset. Site would deliver a mix of uses including housing. Site covered by the Western Heights SPD.
TC4S032	Ethelbert Road garages, Deal	Deal	5	Small brownfield site in the urban area. Accords with growth strategy. Allocated to meet the NPPF requirement to accommodate at least 10% of the Council's housing requirement on sites no larger than 1ha.

Sites that have been selected for allocation in the Local Plan from the HELAA and TC4S are considered to be the most suitable sites to deliver the Council's housing growth strategy. Furthermore, where constraints have been identified on sites identified for allocation, it is considered that these can be mitigated through the Local Plan and planning application process. Conversely, where sites have been identified as suitable/ potentially suitable and available in the HELAA/TC4S but have not been selected as Local Plan allocations, this is because the site is considered not to be in accordance with the Council's growth strategy at this time, in conflict with SP4 of the Local Plan and/or be subject to other constraints that would prevent them from being brought forward at this time.

The final list of sites included as housing allocations for the Regulation 19 Local Plan is set out below. The proposed allocations amount to 5,592 dwellings in total.

HELAA Reference	Location	Settlement	Agreed Housing Number
ALK003	Land at Short Lane, Alkham	Alkham	10
AYL001	Land at Dorman Avenue	Aylesham	9
AYL003	Land to the south of Spinney Lane, Aylesham	Aylesham	640
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	Capel-le-Ferne	70
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	Capel-le-Ferne	10
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	Capel-le-Ferne	10
CAP013	Land at Cauldham Lane, Capel-le-Ferne	Capel-le-Ferne	5
DEA008	Land off Cross Road, Deal	Deal	100
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	Deal	75
TC4S008	Bridleway Riding School, Station Road, Deal	Deal	25
TC4S032	Ethelbert Road garages, Deal	Deal	5
TC4S047	104 Northwall Road, Deal	Deal	8
GTM003	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	10
DOV006	Land at Dundedin Drive (south), Dover	Dover	8
DOV008	Land adjoining 455 Folkestone Road, Dover	Dover	5

HELAA Reference	Location	Settlement	Agreed Housing Number
DOV017	Dover Waterfront and Bench Street	Dover	363
DOV018	Mid Town	Dover	100
DOV019	Albany Place Car Park, Dover	Dover	15
DOV022B	Land in Coombe Valley, Dover	Dover	80
DOV022C	Land in Coombe Valley, Dover	Dover	20
DOV022E	Land in Coombe Valley, Dover	Dover	150
DOV023	Buckland Mill, Dover	Dover	135
DOV026	Westmount College, Folkestone Road, Dover	Dover	60
DOV028	Charlton Shopping Centre, High Street, Dover	Dover	100
DOV030	Land at Durham Hill, Dover	Dover	10
WHI001	Urban Extension to Whitfield	Whitfield	2200
TC4S026	Land at Military Road, Dover	Dover	9
TC4S027	Land at Roosevelt Road, Dover	Dover	10
TC4S028	Land at Peverell Road, Dover	Dover	6
TC4S030	Land at Colton Crescent, Dover	Dover	10
Part of DOV012	Western Heights, Dover	Dover	100
EAS002	Land at Buttsole Pond, Lower Street, Eastry	Eastry	80
EAS009	Eastry Court Farm, Eastry	Eastry	5
TC4S023	Land adjacent to Cross Farm, Eastry	Eastry	10
EYT003	Land adjoining Terrace Road, Elvington	Elvington	125
EYT008	Land on the south eastern side of Roman Way, Elvington	Elvington	50
EYT009	Land to the east of Terrace Road, Elvington	Elvington	125
EYT012	Sweetbriar Lane, Elvington	Elvington	50
TC4S039	Land at Chapel Hill, Eythorne	Eythorne	5

HELAA Reference	Location	Settlement	Agreed Housing Number
GOO006	Land adjacent to Short Street, Chillenden	Chillenden	5
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	Kingsdown	50
TC4S074	Land adjacent to Courtlands, Kingsdown	Kingsdown	5
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	East Langdon	40
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Lydden	30
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	Nonington	35
PRE003	Apple Tree Farm, Stourmouth Road	Preston	5
PRE016	Site north of Discovery Drive, Preston	Preston	20
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	Preston	40
RIN004	Ringwould Alpines, Dover Road, Ringwould	Ringwould	5
RIN002	Ringwould Alpines, Dover Road, Ringwould	Ringwould	5
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	40
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	Sandwich	32
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	35
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	35
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	40
SAN019	Sydney Nursery, Dover Road, Sandwich	Sandwich	10
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	35
SHE004	Land at Shepherdswell between St Andrew's Gardens, Mill Lane and Meadow View Road	Shepherdswell	40
SHE006	Land west of Coxhill Road, Shepherdswell	Shepherdswell	10

HELAA Reference	Location	Settlement	Agreed Housing Number
SHE008	Land off Mill Lane, Shepherdswell	Shepherdswell	10
TC4S082	Land Adjacent to Mill House, Shepherdswell	Shepherdswell	10
SHE013	Land opposite the Conifers Coldred	Coldred	5
STA004	Land at Durlock Road, Staple	Staple	3
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	St Margaret's at Cliffe	40
STM006	Land at New Townsend Farm, Station Road, St Margarets	St Margaret's	10
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B)	St Margaret's	18
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)	St Margaret's	18
STM010	Land located between Salisbury Road and The Droeway, St Margarets-at-Cliffe	St Margaret's	10
WIN003	Land adjacent to Staple Road	Wingham	20
WIN004	Land adjacent to White Lodge, Preston Hill	Wingham	8
WIN014	Footpath Field, Staple Road, Wingham,	Wingham	75
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	5
WOO006	Land south of Sandwich Road, Woodnesborough	Woodnesborough	10
WOR006	Land to the east of Jubilee Road	Worth	10
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	Worth	15

The Regulation 19 Local Plan groups the site allocation policies by settlement to reflect the agreed settlement hierarchy.

The strategic housing sites are covered by Strategic Policies: this includes the Whitfield Urban Expansion, South Aylesham and Eythorne and Elvington.

Housing sites over 30 dwellings are covered by Non-Strategic Policies. This includes:

- DOV017 (Dover Waterfront and Bench Street)
- DOV018
- DOV022B

- DOV022E
- DOV023
- DOV026
- DOV028
- TC4S083
- DEA008
- WAL002
- SAN004
- SAN006
- SAN007
- SAN008
- SAN013
- SAN023
- EAS002
- EYT008
- SHE004 and TC4S082 - covered by one policy
- STM003
- STM007 and STM008 - covered by one policy
- WIN014
- CAP006
- KIN002
- LAN003
- LYD003
- PRE003, PRE016 and PRE017 - covered by one policy
- NON006

The remaining sites, under 30 dwellings, are covered by a small sites policy for each settlement. The small sites policies take the form of a table that sets out the key considerations for each site.

Gypsy and Traveller Sites

Identification and Assessment of Gypsy and Traveller Sites

The NPPF requires Local Plans to include provision for the needs of Gypsy and Travellers. This is informed by a Gypsy and Traveller Accommodation Assessment which has been carried out for Dover District Council by consultants arc4.

The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arc4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover on existing sites in the District, and 19 potential pitches on existing sites, resulting in a residual need to identify 13 pitches. Three site options were identified for assessment:

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.

The assessment drew on site analysis undertaken by arc4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

The site South of Ash Road was discounted as unsuitable due to the site being located in flood zone 2 and 3, the need for significant highways and water mains connections work and its distance from schools, health and local services.

The land to the south of Alkham Valley Road, Alkham was assessed as being suitable and the land to the North of Snowdown Caravan Site was assessed as being potentially suitable.

In addition to potential new sites, the Gypsy and Traveller Accommodation Assessment (GTAA) site review update January 2020 identified and assessed 5 existing Gypsy and Traveller sites for the potential to intensify the number of pitches on them. The findings of the assessment were published in the GTAA Final report published in March 2020.

A targeted call for sites was carried out alongside the Regulation 18 consultation on the draft Local Plan. Five Gypsy and Traveller sites were submitted in response to this. Following the HELAA methodology outlined above, one site was assessed as being suitable and four sites were assessed as unsuitable.

Sustainability Appraisal of Gypsy and Traveller Sites

Gypsy and traveller site options assessed as being either suitable or potentially suitable in the HELAA have been appraised through the Sustainability Appraisal (4 sites in total).

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.
- Half Acres, Halfacres, Short Lane, Alkham.⁷

The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward.

The five intensification sites identified in the GTAA 2020 were not appraised through the Sustainability Appraisal due to their existing established use and that they were small sites below the HELAA site threshold.

Site Allocation Selection

In determining the sites to be taken forward as gypsy and traveller allocations in the Local Plan the Council has had regard to:

- The overarching growth strategy;
- The requirement to meet the level of need identified in the Gypsy and Traveller Accommodation Assessment;
- The availability of sites for gypsies and travellers;
- The suitability of the identified sites for gypsies and travellers; and
- Representations made by key stakeholders and site promoters.

⁷ This site has subsequently being granted planning permission for 1 pitch and has therefore become a site for intensification.

Regulation 18 Proposed Gypsy and Traveller Allocations

The draft Reg 18 Local Plan proposed to meet the identified need for 42 gypsy and traveller pitches in the District over the Plan period in the following way:

- 10 pitches available through vacancies due to turnover on existing sites.
- 9 pitches provided through suitable intensification of existing sites.
- Through the allocation of both the site in Alkham for 10 pitches and the site in Aylesham for 10 pitches.

The justification for the inclusion of these sites as proposed gypsy and traveller allocations, was set out in the Reg 18 Site Selection Topic Paper (Appendix A).

The proposed gypsy and traveller allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

Regulation 19 Proposed Gypsy and Traveller Allocations

The Council's strategy for meeting the needs of Gypsies and Travellers in the Regulation 19 Local Plan has been updated following the Regulation 18 consultation to take into account:

- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process, including concerns raised by the Kent Downs AONB Unit regarding sites located in the AONB;
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding;
- Planning permissions, including the granting of 10 additional pitches on the site in Alkham, and 6 pitches at Strawberry Fields Hay Hill, thereby delivering these draft allocations;
- Further site assessment work, including site visits to sites previously identified in the Gypsy and Traveller site options investigation study (2020);
- The site promoter for the land to the South of Aylesham confirming that the site wasn't available for the delivery of gypsy and traveller pitches.
- 1 pitch at Half Acres, Alkham allowed at appeal, changing the site status from a proposed allocation to an intensification site.

Given this, the need for Gypsy and Traveller pitches is planned to be met by the following:

- Planning permission has been granted for 18 pitches since the GTAA update in 2020, meeting the need for pitches up to 2028.
- Turnover on existing sites - The GTAA identified 10 pitches that were vacant and available for occupation. A survey carried out in August 2021 confirmed that 5 of these previously vacant pitches are now occupied and 5 pitches remain vacant.
- 5 pitches are to be provided through suitable intensification of existing sites, including the one site identified as suitable through the targeted call for sites. These are identified in policy H3 of the Local Plan.
- Windfall sites – The Local Plan enables the Council to determine planning applications for Gypsy and Traveller sites on a site-by-site basis, subject to individual circumstances and need – see Policy H4.

The strategy proposed identifies specific sites to meet 16 years need from 2020, providing for the majority of the plan period need within the short to medium term, with a 5-year supply of sites. All sites identified for intensification are existing gypsy and traveller sites. Policy H3 of the Local Plan sets out a number of considerations for the intensification of the identified gypsy and traveller sites that will need to be addressed as part of the planning process.

Employment Sites

Identification and Assessment of Employment Sites

The Housing and Economic Land Availability Assessment (HELAA) also considered sites for economic development uses.

As part of stage 1 of the HELAA process officers compiled a comprehensive list of 43 employment sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in 20 sites being removed.

The remaining 23 sites were then assessed to determine their suitability and development potential based on:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

Sites were then classified as being either: suitable (green), potentially suitable (amber) or unsuitable (red). The findings of the HELAA were then published as part of the Regulation 18 consultation on the draft Local Plan and representations were invited.

A targeted call for sites was also undertaken alongside the consultation on the Regulation 18 draft Local Plan. In total 120 sites were submitted, of which 6 were employment sites and 2 were mixed use including employment. Officers undertook a suitability assessment of these sites based on the HELAA methodology outlined above. In summary, of the 8 sites submitted:

- 3 employment sites as suitable;
- 2 employment sites and 1 mixed use site as potentially suitable; and
- 2 employment sites as unsuitable.

As part of the Regulation 18 consultation, representations were also made on both the proposed employment site allocations identified in the Plan and on existing HELAA sites, not proposed as allocations in the draft Local Plan. The Council's response to these comments is reported in the Local Plan Consultation Statement.

The HELAA has subsequently been updated to take account of:

- Updated technical evidence
- Representations made through the consultation on the Reg 18 Draft Local Plan
- Changes in the planning status of sites.
- Changes in the estimated development potential of sites.
- Further engagement with key stakeholders; and
- Further site assessment work.

The HELAA September 2022 (including the targeted for sites) review concluded that of the 29 sites assessed:

- 21 are suitable
- 7 are potentially suitable
- 1 site (Betteshanger Colliery) now has planning permission for predominantly housing

Sustainability Appraisal of Employment Sites

Employment site options assessed as being either suitable or potentially suitable in the HELAA have been appraised through the Sustainability Appraisal (29 sites in total).

The Sustainability Appraisal concluded that no single settlement's employment sites perform particularly better than any other and identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA.

Site Allocation Selection

The HELAA is a technical piece of evidence to support the Local Plan making process and is a requirement of the NPPF. It should however be noted that the HELAA does not in itself determine whether a site should be allocated for development, that is the role of the Local Plan.

In determining the sites to be taken forward as employment allocations in the Local Plan the Council has also therefore had regard to:

- The overarching growth strategy set out in the Local Plan
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan
- The Economic Growth Strategy
- The level of employment need identified in the Economic Development Needs Assessment
- Supply of employment floorspace identified in the AMR
- The development potential of the sites (some sites identified as suitable or potentially suitable are existing employment sites with limited capacity for new floorspace, development would be limited to some intensification or redevelopment.
- The revised settlement hierarchy
- The evidence base that supports the Local Plan; and
- Representations made by key stakeholders and site promoters

Proposed Regulation 18 Employment Allocations

To deliver the Council's economic growth strategy a number of strategic employment allocations were proposed in the draft Local Plan. These include:

- Whitecliffs Business Park, Whitfield

- Aylesham Development Area, Aylesham
- Sandwich Industrial Estate, Sandwich
- Discovery Park, Sandwich
- Ramsgate Road, Sandwich
- Dover Waterfront

The justification for the inclusion of these sites as proposed employment allocations, and conversely the exclusion of others, was set out in the draft Reg 18 Local Plan Site Selection Topic Paper (Appendix A) that was published to support the Regulation 18 Local Plan.

The proposed employment allocations were subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council's response to the comments made at Regulation 18 are reported in the Local Plan Consultation Statement.

Proposed Regulation 19 Employment Allocations

The employment allocations in the Regulation 19 Local Plan have been updated following the Regulation 18 consultation to take into account:

- The updated Economic Development Needs Assessment 2021
- Representations made through the consultation on the Regulation 18 draft Local Plan and the HELAA process.
- Further engagement with key stakeholders on sites and infrastructure requirements;
- Updates to the HELAA and the Targeted Call for Sites;
- The development potential of the sites (some sites identified as suitable or potentially suitable are existing employment sites with limited capacity for new floorspace, development would be limited to some intensification or redevelopment.
- Further site specific SA work;
- New and updated technical work – for example the flood risk assessment of the proposed allocations in the plan, for all types of flooding, and LVIA of specific sites.

This has resulted in the following sites being removed as allocations from the Regulation 19 Local Plan:

- Sandwich Industrial Estate – Site was allocated for further intensification. This is now covered by policy E1 and E2.
- Ramsgate Road. Sandwich – Site was allocated for further intensification. This is now covered by policy E1 and E2.

The following sites are existing allocations that have been rolled forward as employment allocations in the Regulation 19 Local Plan:

- White Cliffs Business Park Phases 1, 2 and 3, Whitfield
- Discovery Park, Sandwich
- Aylesham Development Area, Aylesham
- Dover Waterfront

The following sites have been added as new employment allocations in the Regulation 19 Local Plan, following the Targeted Call for Sites undertaken at Regulation 18 and the review of existing HELAA sites based on comments made at Regulation 18.

Site Ref	Address	Settlement	Proposed Use	Reason for Allocation
TC4S076	Statenborough Farm, Eastry	Eastry	B1/B2 and retail	Existing employment site in the rural area, that would be suitable for further employment development to meet the continued demand for rural employment space in the District.
TC4S083	The Citadel, Dover	Dover	Mixed Use	Regeneration of brownfield site to secure the future of this important heritage asset. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. Site covered by the Western Heights SPD.
TC4S092	Fort Burgoyne, Dover	Dover	Mixed Use	Regeneration of this site would secure the future of this important heritage asset. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period.
TC4S120	White Cliffs Business Park Phase 4	Dover		Due to the need for further light industrial floorspace (now covered by Class E(g)(iii)) in the District and the uncertainty regarding the availability and deliverability of part of Phase 2 and Phase 3 of WCBP, it is proposed to identify additional land adjoining White Cliffs Business Park (known as Phase 4) to meet this need and ensure there is choice and flexibility in this location.
AYL005	Former Snowdown Colliery	Aylesham	Mixed Use	The regeneration of this site would secure the future of the heritage asset on the site. Site would deliver flexible employment uses, to achieve a higher level of job growth and help provide additional flexibility and choice to the market over the Plan period. The development of this site would also support the rural economy.

Sites have been selected for allocation in the Local Plan in accordance with the economic strategy set out in the Local Plan. The intensification of existing employment sites will be supported through Policies E1 and E2 of the Local Plan.

The final list of employment site allocations for the Regulation 19 Local Plan is as follows:

- White Cliffs Business Park Phases 1, 2, 3 and 4, Whitfield
- Discovery Park, Sandwich
- Aylesham Development Area, Aylesham
- Statenborough Farm, Eastry
- Fort Burgoyne, Dover
- The Citadel, Dover
- Dover Waterfront
- The Former Snowdown Colliery, Aylesham

The Regulation 19 Local Plan groups the site allocation policies by settlement to reflect the agreed settlement hierarchy. With the exception of Statenborough Farm Eastry, all the above sites are considered to be strategic site allocations. Discovery Park already benefits from planning permission and therefore isn't covered by a specific site allocation policy.

Appendices

Appendix A – The Selection of Site Allocations for the Draft Local Plan (reg 18)

This paper provides the background to the selection of the proposed housing, gypsy and traveller and employment site allocations for the Draft Local Plan, and sets out the reasoning behind the selection of specific site options within the District's Regional, District, Rural Service, Local Centres, Villages and Hamlets.

Overarching Growth Strategy

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

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

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

The SA identified and appraised five reasonable spatial options for growth (i.e. the pattern and extent of growth in different locations):

- Spatial Option A: Distributing growth to the District's suitable and potentially suitable housing and employment site options (informed by the HELAA and Economic Land Review).
- Spatial Option B: Distributing growth proportionately amongst the District's existing settlements based on their population.
- Spatial Option C: Distributing growth proportionately amongst the District's existing settlements based on the District's defined settlement hierarchy (informed by the Settlement Hierarchy Topic Paper).
- Spatial Option D: Distributing growth in the same way as the adopted Local Plan, focussing most growth in and around Dover.
- Spatial Option E: Distributing growth more equally across the District's settlements: Dover, Deal, Sandwich and Aylesham, as well as the rural villages.

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

However, given the environmental constraints that exist around Deal and Sandwich very few suitable and potentially suitable sites have been identified in these towns. Given this, the council's preferred option for the distribution of housing and economic growth will comprise a combination of options A (HELAA sites), C (settlement hierarchy) and D (Dover focus). The distribution of housing

and economic growth in the District will therefore primarily be based on the settlement hierarchy, and influenced by site availability, environmental constraints and factors of delivery.

Sites have therefore been selected in accordance with the preferred option for the distribution of housing and economic growth, based on their suitability, availability, and achievability.

Settlement Hierarchy

To support the consideration of the Growth Options through the Sustainability Appraisal process a review of the Settlement Hierarchy was undertaken.

The purpose of the Settlement Hierarchy Study was to identify those settlements in the District that are the most sustainable, based on the range of facilities and services present. It focuses in particular on the rural settlements of the District, given that the sustainability credentials of the district's three main centres of Dover, Deal and Sandwich are well-established.

The NPPF and NPPG require that Local Planning Authorities promote sustainable development in rural areas to support the vitality of their rural communities. New housing can enable rural communities to retain their existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

The continued national policy emphasis on sustainable development means that housing development should, where possible, be concentrated in the three urban centres of the district, Dover, Deal and Sandwich, with new development in the rural areas limited and focused on villages commensurate with their scale and position in the hierarchy, unless local factors, including flood risk and environmental designations, dictate otherwise. As the Settlement Hierarchy Study and its predecessor have established, Dover District does not possess a large number of larger villages, but rather a large number of small settlements. The Settlement Hierarchy Study indicates that it is therefore appropriate that the distribution of new housing in the rural areas of the district reflects such a settlement pattern.

The Council has used the Settlement Hierarchy Study to inform the proposed site allocations for the Local Plan and determine how much development an individual settlement should accommodate based on its position in the revised Settlement Hierarchy.

Housing Sites

Identification and Assessment of Housing Sites

The Housing and Economic Land Availability Assessment (HELAA) identifies a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. The HELAA has been prepared in accordance with the guidance set out in the Government's Planning Practice Guidance <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment>

As part of stage 1 of the HELAA process officers compiled a comprehensive list of housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in sites being removed.

The remaining sites were then taken forward for more detailed assessment. The first stage of this process involved a desktop review using GIS to identify any relevant on-site constraints. Following this, sites were then physically surveyed and assessed to determine their suitability and development potential (i.e number of houses that could be delivered on the site) using the following criteria:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

In addition to this, comments were also sought from key stakeholders (including KCC Highways, DDC Heritage Officer, Landscape Architect, Environment Agency and the Kent Downs AONB Unit) with regards to the suitability of some of the sites.

The suitability assessment identified:

- 93 sites as suitable⁸;
- 41 sites as potentially suitable⁹; and
- 197 sites as unsuitable¹⁰.

The remaining 33 sites gained planning consent during the assessment process and were therefore removed.

The suitable and potentially suitable sites were then subjected to an availability assessment to determine whether the sites were available for development within the plan period. This involved contacting the relevant site owners/promoters to confirm the sites availability for development within the next 15-20 years. The availability assessment revealed:

- 114 sites as available¹¹;

⁸ Suitable is defined in the HELAA as: *'site offers a suitable location for development for the use proposed and is compatible with neighbouring uses. There are no known constraints that will significantly limit the development of the site.'*

⁹ Potentially suitable is defined in the HELAA as: *'site offers a potentially suitable location for development for the use proposed, but is subject to a policy designation which inhibits development for the defined use and/or constraints that require mitigation. The development plan process will determine the future suitability for the defined use and whether the constraints can be overcome.'*

¹⁰ Unsuitable is defined in the HELAA as: *'site does not offer a suitable location for development for the proposed use and/or there are known constraints which cannot be mitigated. The site is unlikely to be found suitable for the defined use within the next 15-20 years.'*

¹¹ Available is defined in the HELAA as: *'landowner/ site promoter has confirmed availability within the next 15-20 years and there are no known legal issues or ownership problems.'*

- 12 sites as potentially available¹²; and
- 8 sites as unavailable¹³.

Councillors were consulted on the draft findings of the HELAA in 2019, following which a series of meetings were held with Town and Parish Councils in February/March 2020. The draft HELAA was then published on the council's website at the start of April 2020. This concluded that the 126 sites, with a capacity to accommodate 12,111 dwellings, are suitable or potentially suitable and available or potentially available.

The draft HELAA has subsequently been updated to take account of:

- Further evidence requested by officers in relation to highways constraints identified on certain sites;
- New availability evidence;
- Viability evidence in respect of achievability;
- Comments made as part of the wider engagement on the HELAA sites;
- Sites which now have planning permission.

The updated HELAA has been published as part of the Regulation 18 consultation on the draft Local Plan and further representations are invited.

Appraisal of Housing Sites

As part of the Sustainability Appraisal of the draft Local Plan site specific Sustainability Appraisal assessments were carried out on the 126 HELAA sites that were assessed as being suitable or potentially suitable and available or potentially available. In addition to this, a further 8 sites were also subjected to SA alongside the other 126 sites on a precautionary basis. These were sites where the Council had been unable to contact the landowners to confirm their availability before the SA work was carried out.

Each residential site option was appraised using the detailed assessment criteria and associated assumptions set out in the Sustainability Appraisal (see Sustainability Appraisal Report). To ensure that all site options were appraised to the same level of detail in the SA, all options have been appraised at a high level based on the potential capacity of each site using each sites redline boundary and the Council's most up-to-date evidence base.

The Sustainability Appraisal then organised the sites by settlement, with the strongest site options at the top and the weaker performing site options at the bottom. The stronger performing sites have the fewest adverse effects recorded, in particular potential significant adverse effects, and the potential to generate the most positive effects. Conversely, the weakest performing site options have the greatest potential to generate adverse effects, particularly significant adverse effects, and the least potential for positive effects

The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or

¹² Potentially available is defined in the HELAA as: 'Confirmation has not yet been received from the landowner/ site promoter that the land will be available within the next 15-20 years. Further information is required to provide the Council with certainty that the site is available.'

¹³ Unavailable is defined in the HELAA as: 'The landowner/ site promoter has confirmed that the land is not available for development in the next 15-20 years. The land is subject to known legal issues which are unlikely to be overcome within the next 15-20 years. It has not been possible to make contact with the landowner/ site promoter.'

significantly mitigate the potential significant adverse effects identified through the SA against SA objectives 5 (Air Pollution), 7 and (Flood Risk) and 9 (Biodiversity) through the policies in the draft Plan.

Site Selection Process

The interim HELAA (2020) identified 126 green and amber sites, that would deliver in the region of 12,111 new homes. This is clearly in excess of the amount of land that is needed to meet the residual housing requirement of 5,288 homes over the Plan period (figure doesn't include the Whitfield Urban expansion).

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

In determining the sites to be taken forward as housing allocations in the draft Local Plan the Council has also therefore had regard to:

- The overarching growth strategy set out in the draft Local Plan;
- Site specific Sustainability Appraisal assessments carried out as part of the Sustainability Appraisal of the Local Plan;
- The revised settlement hierarchy;
- The Whole Plan Viability Study;
- The Air Quality Study; and
- The Local Plan Transport Modelling Work.

Proposed Housing Allocations

The Local Plan allocates sites to deliver 7,511 new homes over the Plan period, of which 3,690 homes are proposed on strategic sites and 3,821 are proposed on non-strategic housing sites. Strategic housing allocations are proposed at:

- Whitfield – The urban expansion of Whitfield is currently identified as a strategic allocation in the Core Strategy 2010 for the delivery of at least 5,750 new homes. Through the Housing and Economic Land Availability Assessment work the Council has also identified an area of land to the north-west of the existing allocation for the delivery of approximately 600 new homes. Strategic Policy 4 allocates this site in addition to the existing allocation at Whitfield for development in accordance with the growth and settlement strategy of the Plan. To date 1,483 homes have been granted consent at Whitfield of which there have been 200 completions, leaving 1,283 homes extant as at 31 March 2020. It is currently estimated that a minimum of a further 2,200 homes can be delivered at Whitfield over the Plan period, with the remainder of the development being delivered outside the Plan period.
- Aylesham – Aylesham is identified as a Rural Service Centre in the settlement hierarchy with the potential to accommodate further growth. Through the Housing and Economic Land Availability Assessment work the Council has identified two sites for development in Aylesham, one to the North of Aylesham for the delivery of approximately 500 new homes and the second to the south of Aylesham for the delivery of approximately 640 new homes. Strategic Policies 5 and 6 allocate these sites for development in accordance with the growth and settlement strategy of the Plan.

- Elvington and Eythorne – As part of the Council's housing growth strategy it is proposed to grow the villages of Eythorne and Elvington to create a new local centre in the District. Through the Housing and Economic Land Availability Assessment work the Council has identified an area of land between Eythorne and Elvington for the delivery of approximately 350 new homes. Strategic Policy 7 allocates the land to the east of Adelaide Road for development in accordance with the growth and settlement strategy of the Plan

A number of non-strategic allocations are also proposed in Site Allocations Policy 1 in the draft Local Plan.

The justification for the inclusion of these sites as proposed housing allocations in the draft Local Plan, and the exclusion of others, is set out in Appendix A.

Where constraints have been identified on sites, it is considered that these can be mitigated as part of the planning process and the Strategic and Site Allocations policies set out a number of key considerations for each site in relation to highways, access, heritage, landscape, minerals and flooding, that will need to be addressed by the land owner when taking the site forward.

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

The proposed housing allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, further information will be requested from land owners/ site promoters of the proposed allocations to demonstrate the sites deliverability. Any comments received on site specific matters will be reviewed, and the Plan will then be updated prior to Regulation 19.

Gypsy and Traveller Sites

Identification and Assessment of Gypsy and Traveller Sites

The NPPF requires Local Plans to include provision for the needs of Gypsy and Travellers. This is informed by a Gypsy and Traveller Accommodation Assessment which has been carried out for Dover District Council by consultants arc4.

The Council's Gypsy and Traveller Accommodation Assessment (GTAA) update prepared by arc4 in 2020 identified a need for 42 pitches over the Plan period. The assessment identified capacity for 10 pitches through turnover on existing sites in the district, and 19 potential pitches on existing sites, resulting in a residual need to identify 13 pitches. Three site options were identified for assessment:

- Land to the south of Alkham Valley Road, Alkham;
- Land to the North of Snowdown Caravan Site; and,
- Land East of Kestrels Fen and South of Ash Road.

The assessment drew on site analysis undertaken by arc4, feedback from key stakeholders and assessment of land constraints, including landscape and highway surveys.

The site South of Ash Road was discounted as unsuitable due to the site being located in flood zone 2 and 3, the need for significant highways and water mains connections work and its distance from schools, health and local services.

The land to the south of Alkham Valley Road, Alkham was assessed as being suitable and the land to the North of Snowdown Caravan Site was assessed as being potentially suitable.

Appraisal of Gypsy and Traveller Sites

The two gypsy and traveller site options have been appraised through the Sustainability Appraisal. The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward.

Of the two sites appraised, the Aylesham site option performs better against the SA framework being in a slightly more sustainably accessible location have having less opportunity to adversely affect the local environment.

Site Selection Process

In determining the sites to be taken forward as gypsy and traveller allocations in the draft Local Plan the Council has had regard to:

- The overarching growth strategy;
- The requirement to meet the level of need identified in the Gypsy and Traveller Accommodation Assessment;
- The availability of sites for gypsies and travellers; and
- The suitability of the identified sites for gypsies and travellers.

Proposed Gypsy and Traveller Allocations

The draft Local Plan proposes to meet the identified need for 42 gypsy and traveller pitches in the District over the Plan period in the following way:

- 10 pitches are likely to become available through turnover on existing sites and this will be monitored as part of the Council's yearly Housing Information Audit.
- 9 pitches can be provided through suitable intensification of existing sites (see DM Policy 10).
- Through the allocation of both the site in Alkham and the site in Aylesham for gypsy and traveller pitches.

The land to the south of Alkham Valley Road is allocated in Site Allocations Policy 2 for 10 pitches. This site was selected for allocation as its an established gypsy and traveller site that has planning consent and forms part of the 19 pitches for intensification. The site is considered to be available and deliverable in the short term.

The land to the North of Snowdown Caravan Site is allocated in Strategic Policy 6 South Aylesham for 10 pitches. This site is dependant on being delivered as part of the wider development of this site. It

is in close proximity to an existing KCC run gypsy and traveller site. The site is considered to be available and deliverable in the medium to long term.

Where constraints have been identified on the sites, it is considered that these can be mitigated as part of the planning process and the Strategic and Site Allocations policies set out a number of key considerations for each site that will need to be addressed by the land owner when taking the site forward.

The proposed gypsy and traveller allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. As part of this, a call for sites will be carried out with the aim of identifying additional land that could deliver the 3 pitches required to meet the level of identified need and to provide a wider range of options for potential site allocations.

Employment Sites

Identification and Assessment of Employment Sites

The Housing and Economic Land Availability Assessment (HELAA) also considered sites for economic development uses.

As part of stage 1 of the HELAA process officers compiled a comprehensive list of 43 housing sites for assessment, based on a call for sites (completed in June 2017) and a desk-based review of existing information. Following this, officers undertook an initial sift of these sites to eliminate sites that were too small; covered by national designations; and/or contrary to the NPPF, which resulted in 20 sites being removed.

The remaining 23 sites were then assessed to determine their suitability and development potential based on:

- site size, physical characteristics of the site and location;
- land uses and character of surrounding area;
- landscape impact, impacts on landscape views and screening of site;
- potential impact on heritage assets relevant to the site;
- access and highways; and
- environmental constraints.

Sites were then classified as being either: suitable (green), potentially suitable (amber) or unsuitable (red).

The updated HELAA has been published as part of the Regulation 18 consultation on the draft Local Plan and further representations are invited.

Appraisal of Employment Sites

As part of the Sustainability Appraisal of the draft Local Plan site specific Sustainability Appraisal assessments were carried out on the 23 employment sites identified in the HELAA.

The Sustainability Appraisal concluded that no single settlement's employment sites perform particularly better than any other and identified no fundamental constraints at individual site level that would prevent sites from coming forward. On all sites there is considered to be scope to avoid or significantly mitigate the potential significant adverse effects identified through the SA.

Site Selection Process

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

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

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

Given this, whilst there is still some remaining development potential on existing allocations, which can be rolled forward into the new draft Local Plan, options for allocating further land for employment development are currently limited and further land is therefore likely to be required to deliver the Council's Economic Strategy.

Proposed Employment Allocations

To deliver the Council's economic growth strategy a number of strategic employment allocations are proposed in Strategic Policy 9 of the draft Local Plan. These include:

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

The justification for the inclusion of these sites as proposed employment allocations in the draft Local Plan, and the exclusion of others, is set out in Appendix 2.

The proposed employment allocations are subject to consultation as part of the wider Regulation 18 consultation on the draft Local Plan. The Council will also be carrying out a call for employment sites as part of the Regulation 18 consultation on the Local Plan. Any comments received on site specific matters will be reviewed, and the Plan will then be updated prior to Regulation 19.

Appendix 1: Reasons for the selection of the proposed housing allocations for the draft Local Plan by settlement

Alkham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
ALK003	Land at Short Lane, Alkham	0.32	10	Medium	Site in AONB and KCC Minerals area. Existing tree's should be retained and a landscape buffer is required.	<p>Alkham is a large village, where development would be acceptable in principle in or adjoining the settlement.</p> <p>ALK003 is the only suitable site identified in Alkham through the HELAA, and is therefore proposed as an allocation, in line with the Council's growth strategy.</p> <p>A number of key considerations have been identified in relation to this site and these will need to be addressed by the land owner as part of the planning process.</p> <p>Where the SA has identified significant adverse effects in relation to this site there is considered to be sufficient scope to avoid or significantly mitigate these.</p>

Ash

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
ASH003	Land south of Mill Field, Ash	0.40	8	Medium	Archaeological Assessment required. A landscape buffer is required.	<p>Ash is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.</p> <p>ASH003, ASH004, ASH010, ASH011, ASH014 and ASH015 are proposed as allocations, in line with the Council's growth strategy. ASH010 has also recently been granted planning permission. Any further allocations in Ash were not considered to be in accordance with the settlement hierarchy and would not lead to sustainable development.</p> <p>ASH005 and ASH008 have been discounted as relative to the other reasonable options they were not considered to be as well related to the existing settlement of Ash. ASH008 also performs poorly in the SA of the sites.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Ash and these will need to be addressed by the relevant land owners as part of the planning process.</p>
ASH004	Land to the north of Molland Lane, Ash	4.48	110	Long	Transport Assessment and Heritage Assessment required. A landscape buffer is required. Vehicular access to be provided from Chequer Lane.	
ASH010	Land adjacent to Saunders Lane, Ash	3.40	76	Short	Heritage Assessment required. A tree survey would be required and existing trees should be retained where possible.	
ASH011	Guilton, Ash	0.35	10	Medium	Heritage Assessment and Land contamination assessment required. A landscape buffer is required.	
ASH014	Land to the south of Sandwich Road, Ash	3.34	63	Short	Heritage Assessment and Land Contamination Assessment required. Vehicular access from Sandwich Road. No vehicular access from Cherry garden lane. Existing boundary hedgerows and vegetation to be retained and enhanced.	
ASH015	Former Council Yard, Molland Lea, Ash	0.16	5	Medium	Land Contamination Assessment required.	

						<p>Furthermore, where the SA has identified significant adverse effects in relation to ASH004 and ASH010 there is considered to be sufficient scope to avoid or significantly mitigate these.</p> <p>A Neighbourhood Plan is currently being prepared for Ash. The sites proposed as allocations in the Local Plan are the same as those identified in the draft Ash Neighbourhood Plan, with the exception of ASH010, which has recently been granted planning permission.</p>
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Aylesham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
AYL001	Land at Dorman Avenue, Aylesham	0.31	9	Medium	Archaeological Assessment required.	Aylesham is a rural service centre and suitable for a scale of development that would reinforce its role as a provider of services to the rural area.
AYL002	Land at the Boulevard, Aylesham	0.61	17	Medium	Archaeological Assessment required.	
AYL003	Land to the South of Spinney Lane Aylesham	132.22	640	Medium	Transport Assessment and Archaeological Assessment required. Ancient woodland will need to be protected. Landscape buffer required to the south and west of the site.	AYL003 and AYL004 have been identified as strategic sites in the Local Plan to deliver the council's housing growth strategy. Whilst constraints do exist on these sites, primarily in relation to highways, work is on-going to address this and develop an appropriate mitigation scheme.
AYL004	Land to the North of Aylesham	36.35	500	Medium	Transport Assessment and Archaeological Assessment required.	

					<p>Landscape buffer required to the west of the site.</p>	<p>AYL001 and AYL002 are small sites within the existing settlement of Aylesham and are considered suitable for development in accordance with the housing growth strategy.</p> <p>AYL005 is not proposed as an allocation at this stage. This site has been put forward to enable the development of the larger adjacent site for employment uses. It is considered that this could come forward separately outside of the Local Plan. The site is also a Local Wildlife site and has a number of constraints that would need to be mitigated.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Aylesham and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Where the SA has identified significant adverse effects in relation to these sites there is considered to be sufficient scope to avoid or significantly mitigate these.</p>
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Capel-le-Ferne

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
CAP006	Land to the east of Great Cauldham Farm, Capel-le-Ferne	4.02	50	Short	Transport Assessment and Archaeological Assessment required. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed. Vehicular access to be provided from Capel Street. A landscape buffer is required between the site and the AONB to the NW. Development should be set back from the existing residential properties.	Capel-le-Ferne is a large village where development would be acceptable in principle in or adjoining the settlement. All the suitable and potentially suitable HELAA sites identified in Capel are proposed as allocations in the Local Plan, in accordance with the Council's growth strategy (CAP006, CAP009, CAP011 and CAP013).
CAP009	Longships, Cauldham Lane, Capel-le-Ferne	0.66	10	Medium	Archaeological Assessment required. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed. A landscape buffer is required to mitigate impact on the adjacent AONB.	A number of key considerations have been identified in relation to the proposed site allocations in Capel le Ferne and these will need to be addressed by the relevant land owners as part of the planning process.
CAP011	Land known as the former Archway Filling Station, New Dover Road, Capel-le-Ferne	0.57	18	Medium	Site in AONB. Existing trees and hedgerow should be retained wherever possible and a generous landscape buffer will be required. Archaeological Assessment required.	With regards to CAP006, due to highways concerns the estimated dwelling number on this site has been halved, and the size of the allocation has been reduced to reflect this.
CAP013	Land at Cauldham Lane, Capel-le-Ferne	0.76	15	Medium	Archaeological Assessment required. Landscape buffer required to mitigate impact on the adjacent AONB. Cumulative impact on Capel Street/Cauldham Lane/New Dover Road junction to be addressed.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on these sites

Deal Area

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
Deal						
DEA008	Land off Cross Road, Deal	8.73	100	Medium	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. A landscape buffer is required. Cumulative highways impact to be addressed.	Deal (incorporating Sholden, Great Mongeham and Walmer) is identified as a District Centre in the settlement hierarchy and should be the secondary focus for development in the District. Given this, all the suitable and potentially suitable HELAA sites identified in the Deal area are proposed as housing allocations (DEA008, DEA018, DEA020, DEA021, SHO002, SHO004, GTM003 and WAL002). This is because these site options are compatible with the Council's preferred housing growth strategy and can make notable contributions to delivery of District's housing needs of the Plan period over the short, medium and long term. A number of key considerations have been identified in relation to the proposed site allocations in the Deal area and these will need to be addressed by the relevant land owners as part of the planning process.
DEA018	Church Lane/Hyton Drive, Deal	0.48	18	Short	Archaeological Assessment required. KCC minerals area.	
DEA020	Land off Cross Road, Deal	4	100	Medium	Transport Assessment and Archaeological Assessment required. A landscape buffer is required. Cumulative highways impact to be addressed.	
DEA021	Land off Freeman's Way, Deal	3.69	88	Short	Archaeological Assessment and Land Contamination Assessment required. Site is open space.	
Sholden						
SHO002	Land at South West of Sandwich Road, Sholden, Deal	5.26	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative highways impact to be addressed. A generous landscaping scheme and landscape buffer is required.	
SHO004	Land adjoining Pegasus, Sandwich Road, Sholden	1.21	42	Short	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed.	

					A generous landscaping scheme and landscape buffer is required.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on DEA008, DEA020, DEA021, SHO002, SHO004 and WAL002.	
Great Mongeham							
GTM003	Land to the east of Northbourne Road, Great Mongeham	0.77	10	Medium	Heritage Assessment required. A generous landscaping scheme is required.		
Walmer							
WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	4.44	100	Medium	Transport Assessment and Archaeological Assessment required. Cumulative impact on the road network to be addressed. A landscape buffer will be required.		

Dover Area

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
Dover						
DOV006	Land at Dundedin Drive, Dover	0.37	8	Medium	Archaeological Assessment required. Existing trees should be retained where possible.	Dover is a secondary regional centre and therefore the major focus for development in the District. This is reflected in the level of growth proposed here. The urban expansion of Whitfield (WHI008), and the proposed northern extension to the site (WHI001), is identified as a strategic housing allocation in the draft Plan (rolled forward from the existing Core Strategy 2010) and will continue to be the focus of housing growth in the District. WHI008 is also subject to a number of
DOV008	Land adjoining 455 Folkestone Road, Dover	0.34	5	Short	Site in AONB. A landscape buffer is required to mitigate any impact on the AONB.	
DOV009	Land at Stanhope Road, Dover	0.82	32	Short	Archaeological Assessment required.	
DOV012	Former Channel Tunnel Workers Accommodation, Farthingloe, Dover	11.62	100	Medium	Heritage Assessment and Land Contamination Assessment required Site in AONB and KCC Minerals area. A comprehensive landscaping scheme and landscape buffer will be required to mitigate impact on the landscape.	

DOV017	Dover Waterfront	10.98	200	Long	Heritage Assessment required. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment and Transport Assessment required. An assessment of air quality, noise, vibration and light pollution will also be needed.	<p>planning permissions to take this site forward.</p> <p>Furthermore, it is proposed to continue with the regeneration of key sites in the Town Centre including Dover Waterfront (DOV017) and Mid Town (DOV018) (both currently allocated for development in the Council's Core Strategy 2010), and these are rolled forward as allocations for mixed use development including housing in the draft Local Plan.</p> <p>Unless sites are now unavailable the majority of the suitable and potentially suitable sites identified in the HELAA in the Dover area are proposed as allocations (i.e DOV006, DOV008, DOV009, DOV012, DOV019, DOV022B, DOV022C, DOV022E, DOV023, DOV025, DOV026, DOV028, DOV030, GUS002 and WHI006). This is because these site options are compatible with the Council's preferred housing growth strategy and can make notable contributions to delivery of District's housing needs of the Plan period over the short, medium and long term. DOV009 and part of DOV022C have also now been granted planning permission.</p> <p>Sites confirmed as unavailable include DOV010, DOV021, DOV022A, DOV029 and DOV035.</p>
DOV018	Dover Mid Town	5.99	100	Medium	Heritage Assessment required. Development should be set back from the River Dour. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment and Transport Assessment required.	
DOV019	Albany Place Car Park, Dover	0.28	15	Medium	Heritage Assessment required.	
DOV022B	Land adjacent to the Gas Holder, Coombe Valley, Dover	0.91	40	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV022C	Land between Coombe Valley Rd and Primrose Rd, Dover	0.37	20	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV022E	Land at Barwick Rd Industrial Estate, Coombe Valley, Dover	3.69	220	Medium	Transport Assessment and Land Contamination Assessment required.	
DOV023	Buckland Paper Mill, Dover	2.38	124	Short	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required.	

					Land Contamination Assessment required. KCC Minerals area.	The Council are also now pursuing DOV007 and DOV032 for employment/tourism use. This area has therefore been identified as an opportunity area in the Dover Town Centre policy. A number of key considerations have been identified in relation to the proposed site allocations in the Dover and these will need to be addressed by the relevant land owners as part of the planning process. Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites in Dover.
DOV025	Land off Wycherley Crescent, Dover	0.54	10	Medium	Site is covered by two Local Wildlife sites - mitigation will therefore be required.	
DOV026	Westmount College, Folkestone Road, Dover	1.43	100	Medium	Land Contamination Assessment required. Existing trees should be retained where possible, and screening should be provided at the boundary. Better links should be provided through the site to connect with the public open space to the north.	
DOV028	Charlton Shopping Centre, High Street, Dover	0.63	100	Medium	Heritage Assessment required. Development should be set back from the River Dour and culverts removed. Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Land Contamination Assessment required. Site in a KCC Minerals area.	
DOV030	Land at Durham Hill, Dover	0.34	10	Short	Heritage Assessment and Land Contamination Assessment required. Site is open space.	
Guston						
GUS002	Connaughts Barracks, Dover	54.98	300	Short	Transport Assessment, Heritage Assessment and Land Contamination Assessment required. A landscaping scheme is required to mitigate impact on the views of and from nearby heritage assets.	
Whitfield						

WHI006	Guide Hut, Sandwich Road, Whitfield	0.24	8	Medium	Existing trees and hedgerow should be retained where possible.
WHI008/ WHI001	Whitfield Urban Extension (including proposed northern extension)	380	2200 (in Plan period)	Long	Development should be in accordance with SPD. Transport Assessment and Heritage Assessment required. A generous landscaping scheme is required to mitigate impact on the countryside.

Eastry

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
EAS002	Land at Buttsole Pond, Lower Street, Eastry	3.93	80	Medium	Transport Assessment and Heritage Assessment required. A generous landscaping scheme and landscape buffer will be required to mitigate impact on the countryside.	Eastry is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.
EAS009	Eastry Court Farm, Eastry	0.84	5	Medium	Transport Assessment and Heritage Assessment required. Existing trees should be retained where possible.	With the exception of EAS007 and EAS011 it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in Eastry in accordance with the Council's growth strategy (i.e EAS002 , EAS009 , and EAS012).
EAS012	Lower Gore Field, Lower Gore Lane, Eastry	3.97	35	Long	Transport Assessment and Archaeological Assessment required. Site in a KCC Minerals area. A significant landscape buffer will be required along the north west boundary of the site. This area should remain undeveloped.	EAS007 is detached from the settlement and is proposed primarily for employment, therefore it is not proposed to allocate this site for housing.

						<p>Part of EAS011 has now been granted planning permission and the remainder of the site is unavailable.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Eastry and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites in Eastry.</p>
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Eythorne and Elvington

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
EYT001	Land at Monkton Court Lane	1.94	20	Medium	Transport Assessment, Heritage Assessment and Archaeological Assessment required. A landscape buffer will be required.	Eythorne and Elvington are currently identified as villages in Policy CP1 of the Core Strategy (2010). However the recent Settlement Hierarchy Review conducted by the Council shows that both these settlements score well in relation to the number of services and facilities provided. Given this, as part of the Council's strategy for the rural area it is proposed to grow the villages of
EYT003/ EYT009/ EYT012	Land to the east of Adelaide Rd, Elvington	20.26	350	Medium/Long	Site to be masterplanned as a whole. Transport Assessment and Archaeological Assessment required. Protection and enhancement of Ancient Woodland on-site A generous landscaping scheme and landscape buffer is required.	

EYT008	Land on the south eastern side of Roman Way, Elvington	1.65	50	Short	<p>Transport Assessment and Archaeological Assessment required. Cumulative impact on the highway to be addressed.</p> <p>Existing trees and hedgerow should be retained where possible and a generous landscaping scheme should be provided.</p>	<p>Eythorne and Elvington to create a new local centre in the District.</p> <p>EYT003, EYT009 and EYT012 are therefore identified as a strategic allocation in the Local Plan in accordance with the Council's housing growth strategy.</p>
EYT019	Land to east of Adelaide Road, Eythorne	0.27	6	Medium	<p>Archaeological Assessment required Site in a KCC Minerals area. A landscape buffer is required.</p>	<p>EYT001, EYT008 and EYT019 have also been identified as suitable sites in the HELAA that would provide a logical extension to the existing settlement and are also proposed as housing allocations in line with the housing growth strategy.</p> <p>It was however considered that any further allocations here would not be consistent with the position of Eythorne and Elvington in the settlement hierarchy, could cause an unacceptable impact on the highway network and would not lead to sustainable development. Given this it is not proposed to allocate EYT002, EYT004 and EYT015.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Eythorne and Elvington and these will need to be addressed by the relevant land owners as part of the planning process.</p>

						Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.
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Goodnestone and Chillenden

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
G00006	Land adjacent to Short Street, Chillenden	1.02	5	Medium	Heritage Assessment and Land Contamination Assessment required. Suitable for executive homes. A generous landscaping scheme is required.	<p>Chillenden is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate both the sites identified as suitable and potentially suitable in Chillenden would be in conflict with the settlements position in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that G00006 was best related to the settlement, and less constrained than G00007. G00007 was therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these</p>

						<p>will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>
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Kingsdown

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	3.46	90	Short	<p>Transport Assessment, Archaeological Assessment and Land Contamination Assessment required.</p> <p>A generous landscaping scheme is required to mitigate impact on the adjacent AONB.</p>	<p>Kingsdown is a large village where development would be acceptable in principle in or adjoining the settlement.</p> <p>KIN002 is the only site identified in the HELAA in Kingsdown as being potentially suitable for development and is proposed as a housing allocation due to the fact its in a relatively sustainable location that is compatible with the council's preferred spatial strategy.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p>

East Langdon

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	4.68	40	Medium	<p>Transport Assessment and Archaeological Assessment required. Impact on local rural road network to be addressed.</p> <p>A generous landscaping scheme is required to mitigate impact on the countryside.</p>	<p>East Langdon is a large village where development would be acceptable in principle in or adjoining the settlement.</p> <p>LAN003 is the only suitable site identified in the HELAA in East Langdon. It is therefore proposed as a housing allocation in accordance with the Council’s growth strategy.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Lydden

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	2.18	65	Medium	<p>Transport Assessment and Heritage Assessment required.</p> <p>Impact on Canterbury Rd/ Church lane junction to be addressed.</p> <p>Existing trees and hedgerow should be retained where possible and a generous landscaping scheme is required to mitigate impact on the countryside.</p>	<p>Lydden is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p>LYD003 is identified as suitable in the HELAA and is proposed as an allocation in accordance with the Council's growth strategy.</p> <p>LYD003 is considered to be better related to the settlement and less constrained than LYD001. LYD001 was therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Nonnington

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	1.14	35	Medium	Heritage Assessment and Land Contamination Assessment required. Existing boundary screening should be retained and enhanced.	<p>Nonington is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>On this basis it was considered that it was only appropriate to continue with the existing undeveloped Land Allocations Local Plan allocation (NON006), and that to allocate further sites would not be sustainable in this location. NON004 and NON009 were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Northbourne

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
NOR005	Betteshanger Colliery, Betteshanger, Deal	20.69	210	Short	<p>Heritage Assessment, Transport Assessment and Land Contamination Assessment required.</p> <p>Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required.</p> <p>Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced to provide a generous landscape buffer.</p>	<p>Northbourne is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p>To allocate all the sites identified as suitable or potentially suitable in the HELAA in Northbourne would be in conflict with the settlement hierarchy and would not lead to sustainable development.</p> <p>Given this it was considered that NOR005 was best related to the settlement, is already supported by existing infrastructure and would deliver the most benefit to the existing community. NOR001, NOR002 and NOR003 were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Preston

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
PRE003	Apple Tree Farm, Stourmouth Road	0.76	12	Medium	Transport Assessment required.	<p>Preston is a large village where development would be acceptable in principle in or adjoining the settlement</p> <p>PRE003, PRE016 and PRE017 are identified as suitable sites in the HELAA and are proposed as allocations in accordance with the Council's growth strategy.</p> <p>These sites are considered to be better related and connected to the settlement and less constrained than PRE001 and PRE007. PRE007 is also now unavailable.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Preston and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>
PRE016	Site north of Discovery Drive, Preston	1.10	35	Medium	Transport Assessment and Land Contamination Assessment required. Site borders Flood Zone 3. Access to be provided through adjacent sites.	
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	2.53	75	Medium	Transport Assessment and Land Contamination Assessment required. Access to be provided through adjacent sites.	

Ringwold

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
RIN004	Ringwould Alpines, Dover Road, Ringwould	0.22	5	Short	Archaeological Assessment required. Existing trees and hedgerows should be retained and enhanced.	<p>Ringwould is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate all the sites identified as suitable in Ringwould would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that RIN004 was the least constrained of the sites and the best related to the settlement, compared to RIN002 and RIN003. These sites were therefore discounted.</p> <p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>

Sandwich

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
SAN006	Sandwich Highway Depot/Chippies Way, Ash Road, Sandwich	2.10	32	Medium	<p>Transport Assessment, Heritage Assessment and Land Contamination Assessment required.</p> <p>Cumulative highways impact to be addressed.</p> <p>Site in Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p>	<p>Sandwich is a rural service centre and suitable for a scale of development that would reinforce its role as a provider of services to the rural area.</p> <p>With the exception of SAN010 and SAN016 all the suitable and potentially suitable sites identified in the HELAA in Sandwich are proposed as allocations (i.e. SAN006, SAN007, SAN008, SAN013, SAN015, SAN019 and SAN023). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term. SAN015 has also recently been granted planning permission.</p>
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	1.58	80	Medium	<p>Transport Assessment and Heritage Assessment required.</p> <p>Cumulative highways impact to be addressed</p> <p>Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p> <p>Existing screening should be retained and enhanced.</p>	<p>SAN010 has been discounted on the basis that it is poorly related to the settlement, could give rise to an unacceptable impact on the highways network and development here would prejudice any future development of SAN024 if it were to become available.</p>
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	0.7	35	Medium	<p>Transport Assessment, Heritage Assessment and Land Contamination Assessment required.</p> <p>Cumulative highways impact to be addressed</p> <p>Site within Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required.</p>	<p>SAN010 has been discounted on the basis that it is poorly related to the settlement, could give rise to an unacceptable impact on the highways network and development here would prejudice any future development of SAN024 if it were to become available.</p>

SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	3.43	60	Medium	Site allocated for housing and the expansion of the Sandwich Sports and Leisure Centre Transport and Heritage Assessment required. Cumulative highways impact to be addressed Existing screening should be retained and enhanced.	SAN016 has been discounted on the basis that it is poorly related to the settlement and could give rise to an unacceptable impact on the highways network. SAN010 and SAN016 also score poorly in the SA of the sites.
SAN015	Kumor Nursery, Sandwich	2.40	67	Short	Transport Assessment required. Cumulative highways impact to be addressed KCC Minerals area.	A number of key considerations have been identified in relation to the proposed site allocations in Sandwich and these will need to be addressed by the relevant land owners as part of the planning process.
SAN019	Sydney Nursery, Dover Road, Sandwich	0.38	10	Medium	Transport Assessment and Archaeological Assessment required. Cumulative highways impact to be addressed Site in Flood Zone 2 and 3. Sequential test and Flood Risk Assessment required. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.	Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	2.19	40	Medium	Transport Assessment and Heritage Assessment required. Cumulative highways impact to be addressed Site in Flood Zone 2 and 3 and within Sandwich Bay defences breach zone. Sequential test and Flood Risk Assessment required. Existing boundary screening should be retained and enhanced.	

Shepherdswell

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
SHE003	Land to the north of Westcourt Lane, Shepherds well	9.55	100	Short	Transport Assessment, Archaeological Assessment and Land Contamination Assessment required. Cumulative impact on the local rural road network to be addressed A comprehensive landscaping scheme will be required to mitigate impact.	Shepherds well is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role. Given this it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in Shepherds well (i.e SHE003 , SHE004 , SHE006 and SHE008). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term
SHE004	Land to the north and east of St Andrew's Gardens, Shepherds well	4.31	40	Short	Transport Assessment and Archaeological Assessment required. Cumulative impact on the local rural road network to be addressed A sensitive landscaping scheme will be required.	
SHE006	Land at Botolph Street Farm, Shepherds well	0.82	20	Medium	Heritage Assessment required. A landscape buffer is required. Cumulative impact on the local rural road network to be addressed	
SHE008	Land off Mill Lane, Shepherds well	0.38	10	Medium	Archaeological Assessment required. Cumulative impact on the local rural road network to be addressed	SHE001 is unavailable. A number of key considerations have been identified in relation to the proposed site allocations in Shepherds well and these will need to be addressed by the relevant land owners as part of the planning process. Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects

						identified through the SA on the sites here.
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Staple

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery	Key Considerations	Reasons for Site Selection
				Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)		
STA004	Land at Durlock Road, Staple	0.24	3	Short	Heritage Assessment required. Site in a KCC Minerals area. Existing boundary screening should be retained and enhanced.	<p>Staple is identified in the small villages and hamlets category in the settlement hierarchy where windfall infill development would be acceptable in principle.</p> <p>To allocate all the sites identified as suitable/potentially suitable in the HELAA in Staple would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that STA004 was the least constrained of the sites and the best related to the settlement compared to STA003, STA008 and STA010. STA009 has recently been granted planning permission.</p> <p>STA003, STA008 and STA010 were therefore discounted on the basis that they are poorly related to the settlement and would not lead to sustainable development.</p>

						<p>A number of key considerations have been identified in relation to the proposed site allocation here and these will need to be addressed by the land owner as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the site here.</p>
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St Margaret's

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery		Key Considerations	Reasons for Site Selection
				Short (2020 to 2024)	Medium (2025 to 2029) Long (2029 to 2040)		
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	1.78	40		Short	Part of the site lies within the AONB and Heritage Coast. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Transport Assessment and Land Contamination Assessment required.	St Margaret's is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role.
STM006	Land at New Townsend Farm, Station Road, St Margarets	1.32	10		Medium	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Archaeological Assessment required. Suitable for executive homes.	Given this it is proposed to allocate all suitable and potentially suitable sites identified in the HELAA in St Margaret's (i.e STM003 , STM006 , STM007 and STM008). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of
STM007	Land to the west of Townsend Farm Road, St Margarets (Site B)	0.63	18		Short	Site in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact.	

					Existing trees and hedgerow should be retained where possible. Transport Assessment and Heritage Assessment required.	the Plan period over the short, medium and long term STM010 and STM011 are unavailable.
STM008	Land to the west of Townsend Farm Road, St Margarets at Cliffe (site A)	0.63	18	Short	Site is partly in AONB. A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact. Existing trees and hedgerow should be retained where possible. Transport Assessment and Heritage Assessment required.	A number of key considerations have been identified in relation to the proposed site allocations in St Margaret's and these will need to be addressed by the relevant land owners as part of the planning process. Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.

Wingham

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WIN003	Land adjacent to Staple Road	0.83	20	Short	Transport Assessment required. Cumulative impact on the road network to be addressed including Adisham Rd/ Staple Rd and Adisham Rd/A257 junction KCC Minerals area.	Wingham is a Local Centre that provides services for the local rural area and is suitable for a scale of growth that would reinforce its role. Given this, with the exception of WIN006, it is proposed to allocate all the suitable sites identified in the HELAA in Wingham (i.e WIN003 ,
WIN004	Land adjacent to White Lodge, Preston Hill	0.31	8	Short	Heritage Assessment and Land Contamination Assessment required. A landscape buffer is required.	

WIN014	Footpath Field, Staple Road, Wingham,	3.60	50	Short	<p>Transport Assessment required. Site in a KCC Minerals area. Cumulative impact on the road network to be addressed including Adisham Rd/ Staple Rd and Adisham Rd/A257 junction A sensitive landscaping scheme in addition to a landscape buffer will be required to mitigate impact.</p>	<p>WIN004 and WIN014). This is because these site options are in relatively sustainable locations that are compatible with the Council's preferred spatial strategy and can make notable contributions to delivery of district's housing needs of the Plan period over the short, medium and long term</p> <p>WIN006 has been discounted as it was refused planning permission on highway grounds and it is considered at this stage that this cannot be mitigated.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Wingham and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>
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Woodnesborough

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WOO005	Beacon Lane Nursery, Beacon	0.73	5	Short	Archaeological Assessment required. Site in KCC minerals area	Woodnesborough is identified in the small villages and hamlets category in

	Lane, Woodnesborough					the settlement hierarchy where windfall infill development would be acceptable in principle.
WOO006	Land south of Sandwich Road, Woodnesborough	1.27	10	Short	Archaeological Assessment required. Existing trees and hedgerow should be retained where possible.	<p>To allocate all the sites identified as suitable in the HELAA in Woodnesborough would be in conflict with the position of the settlement in the settlement hierarchy and would not lead to sustainable development.</p> <p>It was therefore considered that WOO005 and WOO006 were the least constrained sites that were better related to the settlement. Furthermore, WOO007 is unavailable and WOO002 is considered to be too small for allocation.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Woodnesborough and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>

Worth

Site Reference Number	Site	Size (ha)	Estimated Dwelling Number	Anticipated Timescale for Delivery Short (2020 to 2024) Medium (2025 to 2029) Long (2029 to 2040)	Key Considerations	Reasons for Site Selection
WOR006	Land to the east of Jubilee Road	0.56	10	Medium	Heritage Assessment required. Site adjacent to Flood zones 2 and 3. Site in a KCC Minerals area. A landscape buffer will be required.	Worth is a large village where development would be acceptable in principle in or adjoining the settlement
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	0.83	20	Short	Heritage Assessment required. Existing boundary treatment should be retained and enhanced.	<p>WOR006 and WOR009 are identified as suitable sites in the HELAA and are proposed as allocations in accordance with the Council's growth strategy. As it is considered that these sites are best related to the settlement and the least constrained.</p> <p>WOR007 has been discounted on balance given its open space designation in the Worth Neighbourhood Plan.</p> <p>A number of key considerations have been identified in relation to the proposed site allocations in Worth and these will need to be addressed by the relevant land owners as part of the planning process.</p> <p>Furthermore, there is considered to be sufficient scope to avoid or significantly mitigate the significant adverse effects identified through the SA on the sites here.</p>

Note

There are no proposed housing site allocations in the settlements of Ripple, Sutton, Tilmanstone and West Hougham.

In Ripple, no suitable or potentially suitable sites were identified here in the HELAA.

In Sutton, SUT005 and SUT007 have been granted planning permission. SUT009 is also now unavailable, which would prevent the development of SUT002 as this site is detached from the settlement and development here would not be well related to the settlement and would lead to unsustainable development.

Tilmanstone and West Hougham fall within the small villages and hamlets category in the settlement hierarchy and as a result of this it was considered that further development would not be appropriate here. Til001 and HOU004 were therefore discounted.

List of discounted sites

- ASH005
- ASH018
- AYL005
- DOV007
- DOV010
- DOV021
- DOV022A
- DOV029
- DOV032
- DOV035
- EAS007
- EAS011
- EYT002
- EYT004
- EYT015
- GOO007
- HOU004
- LYD001
- NON004
- NON009
- NOR001

- NOR002
- NOR003
- PRE001
- PRE007
- RIN002
- RIN003
- SAN010
- SAN016
- SHE001
- STA003
- STA008
- STA009
- STA010
- STM010
- STM011
- SUT002
- SUT005
- SUT007
- SUT009
- TIL001
- WIN006
- WOO002
- WOO007
- WOR007

Appendix 2 : Reasons for the selection of the proposed employment allocations for the draft Local Plan

ELR Site Ref Number	Site Name	Location	Site size (ha)	Existing Use	Estimated Development Potential	Reason for Allocation	Reason not taken forward for allocation
1	Ramsgate Road, Sandwich	Sandwich	81.6	Industrial area (Allocated B1/B2/B8 uses)	0 sqm	Industrial site. Needs to be protected. No current remaining developable land, but suitable for redevelopment/ intensification to provide further employment uses. Potential to support future expansion/spill-over of the Enterprise Zone over the longer term. Allocated for potential future development as well as protecting existing employment uses.	
2	Discovery Park Enterprise Zone, Sandwich	Sandwich	81.1	Enterprise Zone - LDO to help guide B class development	0 sqm	The premier employment site in the District with international links. Scope for redevelopment of site to accommodate a greater critical mass of activity in future. Excellent transport connections to road network, cycle route, walking distance into Sandwich town and local services. Allocated for potential future development as well as protecting existing employment uses.	
3	Sandwich Industrial Estate	Sandwich	18.3	Industrial area	5,832 sqm	Suitable for redevelopment/ intensification to provide further employment uses. Part of the site has consent for residential, which has been implemented. One plot remains undeveloped. This had consent for 5,832 sqm B8 use industrial units, however this permission has expired (11/00417). Good transport connections, close to Sandwich for local services. Allocated for potential future development as well as existing employment uses.	
4	Aylesham Development Area	Aylesham	4.2	Allocated B1/B2 uses	8,500sqm	Previous allocation. Employment site with land remaining for development. Adjacent site has been identified as being potentially suitable for housing through the HELAA. Close proximity to Aylesham train station. Connections to A2 by road network, but not good access for HGV movements. The demand for some employment land may increase from new housing units, in	

						order to improve sustainability. Site hasn't come forward since 2002 allocation. Suitable site for mixed use, B1 and potentially some B2 due to close proximity to residential. Keep as an employment allocation.	
5	Pike Road Industrial Estate, Eythorne (aka Tilmanstone Employment Site)	Eythorne	9.3	Allocated B2 use	0 sqm		Previously allocated industrial site. Site has permission for 10,000 sqm B2 floorspace and a solar farm (13/00654). Permission is yet to be implemented. The relatively isolated site supports a mix of occupiers, although question whether sufficient demand exists in the local market for this scale of space in this location. Good access to A256 on road network. Fairly isolated site with limited access to local services. Protect employment uses, but not to be strategic allocation.
6	Betteshanger Colliery Pithead	Betteshanger	6.9	Allocated (B1/B2/B8 uses)	2,500sqm		Long-standing employment allocation that has remained undeveloped for a number of years. Site is identified in the HELAA for housing/ mixed use development. Currently subject to a planning application for mixed use re-development including 2,500 sqm B1 floorspace. Suitable for employment uses, but would be suitable for more flexible or mixed uses moving forward in the plan period. Site not to be allocated for employment. Site is allocated for housing.
7	White Cliffs Business Park Phases I-III	Dover	54.7	Allocated B1/B2/B8 uses	Phase 1 - 2,905 sqm Phase 2 - 34,076 sqm Phase 3 - 50,400 sqm	Existing allocation. Premier employment site in the District. Need to protect from further erosion of employment uses. Undeveloped plots remain. Keep as an employment allocation.	
8	Barwick Road Industrial Estate	Dover	20.06	Industrial	0 sqm		Industrial site. Needs to be protected. Suitable for redevelopment/ intensification to provide employment uses, but constrained by its location and access difficulties. Part of the site is currently

							allocated for residential and had permission granted for 220 residential units (12/00111) although this has now lapsed. This part of the site would lend itself to more mixed use development. Protect employment uses, but not to be strategic allocation.
9	Dover Western Docks	Dover	38.53	Port Related	375 sqm		Port related site, covered by a harbour revision order, with the potential to provide an element of employment as part of its future expansion plans. Capacity exists within the site to provide further port related employment uses in the future. Not to be a wider employment strategic allocation.
10	Deal Business Park	Deal	2.4	B1 and B2	0 sqm		Suitable for redevelopment/ intensification to provide employment uses. Part of the site now forms part of the Albert Road mixed use development. Road network constraints. Protect employment uses, but not to be strategic allocation.
11	Albert Road, Deal	Deal	1.8	Brownfield - Site cleared for development	0 sqm		Existing allocation. Site has permission for mixed use development including 960 sqm B1 office space. Provided this is built out no further potential remains. Site would be unsuitable for regular HGV movements given the road network constraints. Protect employment uses, but not to be strategic allocation.
12	Whitfield Urban Extension, (land to east of Sandwich Road and north west of Napchester Road)	Whitfield	310	Greenfield	750 sqm		Existing allocation. Site is identified as a strategic allocation in the draft Local Plan to provide an urban extension to Whitfield. The development is identified to provide 750 sqm B1 floorspace, however there maybe potential to increase this amount if justified. The site is identified for allocation through the housing policies, so not necessary to duplicate within the strategic employment allocations.

13	The Worth Centre, 1 Jubilee Road, Worth	Worth	0.77	Industrial. B1 and B8.	0 sqm		Small scale rural industrial site. Employment allocation in the Worth Neighbourhood Plan. The unit sizes are appropriate in size for smaller local businesses. Potential for some redevelopment/ intensification. Protect employment uses, but not to be strategic allocation.
14	Land off Holt Street, Snowdown, Aylesham	Aylesham	39.94	Vacant/former colliery land	25,000 sqm		Site promoted in the HELAA for a range of employment uses. Provided constraints can be mitigated, site is potentially suitable for employment. KCC have expressed concerns over access and pressure on the surrounding road network. May come forward within the plan period. Not to be allocated as a strategic employment site.
15	Land east of Foxborough Hill, Eastry	Eastry	1.05	Part warehouse, part vacant/former garden centre	100 sqm		Site is promoted in HELAA. Considered to be suitable for smaller scale employment. Concern regarding the cumulative impact on the wider highway network from potential allocation sites within the village, particularly in relation to the rural lanes leading to/from the village and junctions on A256/A257/A258. May come forward within the plan period. Not to be allocated as a strategic employment site.
16	Land at Ringwould Alpines, Dover Road, Ringwould - site submitted 4 times by Lee Evans for B1, care home, holiday accommodation	Ringwould	1.19	Garden centre - retail	1,800 sqm		Site is promoted in the HELAA for a range of uses. It has been identified as being suitable for housing. It is also considered to be potentially suitable for employment uses. The access is constrained. May come forward within the plan period. Not to be allocated as a strategic employment site. Site allocated for housing in the housing allocations policy.

17	A20 Sites (incl. Citadel, Megger, Archcliffe Fort etc)	Dover	6.08	B1, B2 and B8 uses, also D1	0 sqm		There is a cluster of industrial and employment uses adjacent to the A20 at the entrance into the Dover Western Docks area, with excellent transport links. This site has not previously had any specific employment policy, but is clearly an important employment area with Megger, Archcliffe Fort, P&O and the Port Shipping Company at the gateway into the busy Dover Marina and port area. Limited opportunity for expansion. Protect employment uses, but not to be strategic allocation.
18	Dover Waterfront	Dover	12.27	Mixed - limited B1 uses	1,000 sqm	Site is currently allocated as a strategic site in the Core Strategy for mixed use re-development including employment uses. Site has been assessed as still being suitable for mixed use development including an element of employment. Considered a strategic allocation site, to coincide with the wider strategic and economic growth aims for Dover Town. Site also identified as a housing allocation.	
19	Aylesham Industrial Estate	Aylesham	15.8	B1, B2 and B8 uses	0 sqm		Established Industrial site. Limited opportunity for expansion. Protect employment uses, but not to be strategic allocation.
20	Port Zone, Whitfield (aka Old Park Barracks)	Whitfield	21.75	B1, B2 and B8 uses	0 sqm		Mixed use site, including industrial. Needs to be protected. Well located in terms of access to strategic road network. Potential for some redevelopment/ intensification. Protect employment uses, but not to be strategic allocation.
21	Dover Mid Town	Dover	5.99	Mixed - Retail/ Cultural/ Education/ Health/ Police/ Community/ Sport/ Office	1,000 sqm		Site is currently allocated as a strategic site in the Core Strategy for mixed use re-development including employment uses. Site has been assessed as still being suitable for mixed use development including an element of employment. Not to be strategic allocation. Site identified in the Dover Town

							Centre policy and the housing allocations policy.
22	Former Co-op Site and the adjacent Church Street Car Park	Dover	0.60	Retail/ Car Park	2,000 sqm		Site promoted in HELAA for mixed use development. Potential for B uses to be provided as part of the wider proposals for the development of this site. Not to be strategic allocation. Site identified in the Dover Town Centre policy.
23	Citadel	Dover	8.15	Mixed Greenfield and former barracks and vacant immigration centre	2,000 sqm		The Citadel site was previously used as an immigration removal centre and as an army barracks. Provided all the constraints identified can be overcome the site may be potentially suitable for employment uses (B1 primarily). May come forward within the plan period. Not to be strategic allocation.

Appendix B – Reasons for alternative site boundaries

HELAA and SA Site References	Location	Proposed Use	Explanation of boundary change	Site boundary proposed for allocation and reason
AYL003 AYL003r AYL003r2	Land to the south of Spinney Lane, Aylesham	Housing	To reflect the site promotor's land ownership and remove a residential property not proposed for redevelopment.	AYL003r2 – The other options include land not available for development
CAP006 CAP006r	Land to the east of Great Cauldham Farm, Capel-le-Ferne	Housing	Site reduced in size from the landowner's submission to reduce impact on AONB	CAP006r – To protect the setting of the AONB and wider landscape impact of development
DOV017 DOV017r DOV017r2 emp DOV017r2 res	Dover Waterfront and Bench Street, Dover	Housing	Site has been divided into two sites to better reflect landownership and delivery potential. Site has been assessed for employment and housing.	DOV017r res – Bench Street allocation Dover Waterfront 18r – Waterfront allocation. As the sites have separate site specific policies.
DOV018 DOV18r	Mid Town, Dover	Housing	The site boundary was refined to remove areas which are not proposed for redevelopment. Site has been assessed for employment and housing.	Dov018r – The other option includes land not available for redevelopment
DOV022B DOV022Br	Land in Coombe Valley, Dover	Housing	The site boundary was extended to include the gasholder itself which was made available by the landowner	DOV022Br – To accommodate additional brownfield land available for development and provide comprehensive development
DOV026 DOV026r	Westmount College, Folkestone Road, Dover	Housing	The site boundary was extended to meet a line of trees at the site's northern boundary as it is within the same ownership.	DOV026r – To better reflect physical features on the ground
TC4S027 TC4S027r	Roosevelt Road, Dover	Housing	The site submitted comprised three parcels of land. One parcel was removed during the site suitability assessment	TC4S027r – Other parcels not considered to be suitable – see HELAA
TC4S039 TC4S039r	Chapel Hill, Eythorne	Housing	A small edit was made to the site's access where it had previously included an area of footpath	TC4S039r – To better reflect land available for development
LYD003 LYD003r	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Housing	The site's boundary was amended to remove a property, Glebelands, from its extent	LYD003r – The other option includes land not available for development
NON006 NON006r	Prima Windows, Easole Street/Sandwich Road, Nonington	Housing	The site's boundary was amended to remove a property, College Cottage, from its extent	NON006r - The other option includes land not available for development
SAN019 SAN019r	Sydney Nursery, Dover Road, Sandwich	Housing	Site boundary amended after initial suitability assessment carried out	SAN019r – Other site assessed as unsuitable in HELAA
SHE004 SHE004r SHE004r2	Land to the north and east of St Andrew's Gardens, Shepherdswell	Housing	The site's boundary was amended to assess an area accessible from two cul de sacs at St Andrews Gardens as suitable and the remainder of the site as unsuitable. Subsequently, the neighbouring land was also submitted for consideration so the two sites	SHE004r2 – to enable improved access arrangements and a comprehensive development

			were merged to form one continuous parcel	
WHI001 WHI001r	Land to the north west of Whitfield's current housing allocation	Housing	The site's boundary was edited to make it continuous with the boundary of the existing Whitfield housing allocation	WHI001r – no practical difference between two site boundaries
Discovery Park 2 2r 2r2	Discovery Park Enterprise Zone, Sandwich	Employment	The site was split to reflect the fact that the S half has extant planning permission for residential development. The N half of the site was then further amended to remove an area under development as a petrol station and retail area	2r2 – To reflect the area available for employment development
3 3r	Sandwich Industrial Estate	Employment	The site was refined to remove areas which are unavailable for further employment development	Not proposed for allocation as limited land available for development. Addressed by Policy E1 and E2.
4 4r	Aylesham Development Area	Employment	The site was refined to remove areas which are unavailable for further employment development	4r - To reflect the area available for employment development
7 7r 7r2 7r3	White Cliffs Business Park Phases I-III	Employment	The site was extended to include an additional parcel, before being refined to exclude areas proposed for landscaping. The site was then further extended to the east giving the Reg19 site extent	7r3 – Site area selected to meet the needs for employment land whilst protecting the wider landscape
18 18r	Dover Waterfront	Employment	Site has been divided into two sites to better reflect landownership and delivery potential. Site has been assessed for employment and housing.	18r – To allocate as separate sites within individual site policies
21 21r	Dover Mid Town	Employment	The site boundary was refined to remove areas within the existing allocation but which are not proposed for redevelopment. The site was also assessed for housing	21r – To reflect areas available for development
TC4S083 23r	The Citadel Western Heights	Mixed Use	The Citadel was submitted through the TC4S and proposed a smaller part of the site for employment development.	23r - The final site extent reflects the ambition to bring forward a comprehensive scheme which brings the site's heritage assets back into use but also provides space for mixed use redevelopment to enable this.

Appendix E

Sequential and Exception Tests Summary and Review Note

Planning and Flood Risk

Regulation 19 Local Plan – A Sequential Approach to Site Selection

Introduction:

Local Planning Authorities are required to undertake a Strategic Flood Risk Assessment to fully understand the flood risk in the area to inform Local Plan preparation.

In plan-making, local planning authorities are also required to apply the sequential test approach to site selection so that development is, as far as reasonably possible, located where the risk of flooding (from all sources) is lowest, taking account of climate change and the vulnerability of future uses to flood risk.

The Council has undertaken a Strategic Flood Risk Assessment (2019) and a Level 2 Strategic Flood Risk Assessment (2021) to inform the preparation of the Local Plan and the selection of the proposed site allocations.

This paper uses the findings of the Level 1 and Level 2 SFRA for the District and sets out the results of the sequential test and exceptions test of the proposed site allocations, that was undertaken by officers, to inform the preparation of the new Local Plan.

Background

National Planning Policy Framework

The National Planning Policy Framework (NPPF) 2021 at paragraph 159 makes clear that development in areas of flood risk should be avoided and directed to areas of the lowest risk. Where development is necessary in flood areas, the NPPF states that development should be made safe for its lifetime without increased flood risk elsewhere. For the Local Plan this means that sites sought for development should be allocated in areas at the lowest risk of flooding. Where through the Local Plan site selection process, development maybe necessary in areas at risk of flooding, then the Policies in the Plan should set out levels of mitigation to make the development resilient to, and not increase the risk of flooding.

Planning Practice Guidance

The Planning Practice Guidance (PPG) provides detail on how development in a Local Plan should consider flood risk. Through a Strategic Flood Risk Assessment (SFRA) the Sequential Test¹ and where necessary a Exception Test² should be applied when determining land use allocations. The PPG makes clear the Sequential Test should be applied to the whole local planning authority area to increase the possibilities of accommodating development which is not exposed to flood risk. All development proposed within the Local Plan is subject to the Sequential Test, if a site is found in Flood zone 1 then the test is passed for that site, if a site is found in Flood zone 2 or higher then the site subjected to the Exception Test, subject to the vulnerability classification of the development.

The PPG sets out that the Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. There are 2 parts to the Exception Test, firstly that the proposed development would provide wider sustainability benefits to the community that outweigh flood risk, and secondly, that the development will be safe for its lifetime, without increasing flood risk elsewhere and where possible reduce flood risk overall.

Regulation 19 Pre-Submission Local Plan

The distribution of growth proposed in the Local Plan growth strategy is primarily based on the District's settlement hierarchy and influenced by site availability, environmental constraints and factors of delivery. Here, a key aim of the Local Plan growth strategy is to focus development in the least sensitive areas of the District in order to conserve and enhance the District's rich natural and historical environment.

The Council's settlement strategy continues to focus on the development and regeneration of Dover Town and Whitfield, where accessibility to strategic transport networks and public transport is good and the greatest potential exists to maximise accessibility to job opportunities, shops, services and other facilities, and to create a new neighbourhood with supporting infrastructure. Approximately half of the District's new housing development is planned here, the majority of which is to be delivered as part of the urban expansion at Whitfield.

If the distribution of housing growth in the district were to purely follow the settlement hierarchy the secondary focus for development should be the District Centre of Deal, followed by the Rural Service Centres of Sandwich and Aylesham. However, Deal has seen high levels of windfall development over the past ten years, due to market demand, which has resulted in a limited supply of suitable housing sites. Housing delivery in Deal and Sandwich also continues to be constrained by a number of factors including: flood risk, wildlife sites, heritage and highways. Given this, it has been a challenge to identify suitable and available sites in Deal and Sandwich and the growth potential of these settlements is therefore currently considered to be relatively limited.

¹ <https://www.gov.uk/guidance/flood-risk-and-coastal-change#Sequential-Test-to-Local-Plan>

² <https://www.gov.uk/guidance/flood-risk-and-coastal-change#The-Exception-Test-section>

As a result, the remaining housing growth (not already identified at the main settlements of Dover Deal and Sandwich) is planned to be delivered through the strategic expansion of Aylesham, in line with the original vision conceived by Sir Patrick Abercrombie in 1928 for Aylesham to become a small garden town. In addition, there will be development in the rural area of the District, distributed across the District's local centres and large and small villages, taking into account existing constraints, site availability and the settlements position in the settlement hierarchy.

Here, a key part of the Council's growth strategy is to promote the sustainable development of rural areas, to support the vitality of rural communities in line with national policy. New housing can enable rural communities to retain and strengthen existing services and community facilities and help to create a prosperous rural economy. At the same time national policy advises that a balance must be achieved between allowing new housing and the need to protect the character and heritage of the settlements themselves, as well as the surrounding countryside.

As part of the Council's strategy for the rural area it is proposed to grow the adjacent villages of Eythorne and Elvington to create a new local centre in the District, with new services and facilities to be delivered alongside new homes.

Managing flood risk and coastal change has been identified as one of the key issues for the Local Plan to address. This is further iterated through the Plans Strategic Objective to create a Spectacular and Sustainable Environment by managing flood risk sustainably in a way that ensures the safety of residents and property and take opportunities to reduce flood risk where possible.

To accomplish the objective of managing flood risk sustainably a number of Policy criteria have been set out within the Local Plan, including:

Strategic Policy 1.8 Incorporating multi-functional green infrastructure to enhance biodiversity, manage flood risk, address overheating and promote local food production;

Strategic Policy 1.9 Improving water efficiency; and

Strategic Policy 1.10 Ensuring that development does not increase flood risk, including by taking a sequential approach to avoid development in flood risk areas, and where possible reduces the risk of flooding.

Climate Change Policy 5 - Development on sites at risk of flooding must comply with the National Planning Policy Framework and associated guidance and will only be permitted as an exception and where it is demonstrated by a site-specific Flood Risk Assessment (FRA), carried out in accordance with the requirements set out in the Council's Strategic Flood Risk Assessment, that it would not result in an unacceptable risk of flooding on the site itself or elsewhere.

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

Where development does go ahead, all floor levels for living and sleeping accommodation should be set at a minimum of 300mm and 600mm above the flood level for Flood Zones 2 and 3 respectively, including an allowance for climate change.

Furthermore, due to the identification of flood risk on a number of strategic and non-strategic site allocations in the Plan, policy criteria have also been included in the site allocation policies, requiring a site specific flood risk assessment to be carried out and submitted with any planning application for development.

The approach to managing flood risk set out in the Regulation 19 Pre-Submission Local Plan has been informed by engagement with stakeholders, including the Environment Agency, at different stages in the Plan making process. Comments made as part of the Regulation 18 consultation on the draft Local Plan have been taken into account when updating the Plan for Regulation 19 and policies have been updated accordingly.

Strategic Flood Risk Assessment (2019)³

To inform the preparation of the new Local Plan a Strategic Flood Risk Assessment (SFRA) was carried out to identify areas at risk from flooding. The SFRA was published in 2019 and provides the latest planning policy context and flood risk information for the District. The SFRA:

- Identifies the risk of flooding from each source of flooding at key locations within the district;
- Assesses the impact that land use changes and development in the area will have on flood risk;
- Informed the Local Plans sustainability appraisal so that flood risk is taken into account when considering strategic land use policies;
- Provides data and information to enable the Council to apply the Sequential Test to land use allocations and to identify whether the application of the Exception Test is likely to be necessary; and,
- Supports the Council's policies for the management of flood risk within Local Development Documents and assists with the testing of site proposals.

Strategic Flood Risk Assessment Level 2 (2021)⁴

A Level 2 SFRA was carried out in 2021 to inform the suitability and where necessary the potential for mitigation of sites considered for allocation within the Regulation 19 version of the Local Plan. The Level 2 SFRA applied the:

³ <https://www.doverdistrictlocalplan.co.uk/uploads/pdfs/strategic-flood-risk-assessment-2019-sfra.pdf>

⁴ **To be inserted**

- Sequential Test⁵ by identifying the severity and variation on risk within medium and high flood areas:
- Established whether proposed allocations or windfall sites on which the Local Plan will rely are capable of being made safe through their lifetime without increasing flood risk elsewhere; and,
- Where required applied the Exception Test⁶.

Housing and Economic Land Availability Assessment

The Council has undertaken a Housing and Economic Land Availability Assessment (HELAA) to identify a future supply of land in the District which is suitable, available and achievable for housing and economic development uses over the Plan period to 2040. As part of this exercise a call for sites was carried out in 2017 inviting submissions of all types of site for development. To further the site options, specifically with reference to niche sites for need like Gypsy and Traveller and Self Build, a further targeted call for sites was carried out in 2021. All sites submitted were subjected to the HELAA assessment process. With regards to flood risk, every site was subjected to GIS analysis to determine whether the site was within, or partially within, or within 400m of, an identified source of flood risk.

In addition to this, sites were also assessed against other criteria including, highways, landscape, biodiversity, heritage, environmental and sustainability (through proximity to settlement areas) to determine their suitability. Here, sites were assessed in relation to the level of impact they were considered to have on each assessment criteria. Sites were then ranked either Green, with little to no impact, or that the impact could be mitigated; Amber, a level of impact and further consideration of mitigation required; or Red, where the levels of impact were severe, and mitigation could not be accomplished. The Green and Amber assessed HELAA sites were then assessed against the Local Plan development strategy, which determined that development should be directed towards the most sustainable locations in accordance with the overarching growth strategy. With regards to Flood Risk, sites were only considered where there was an impact from the risk if they were in the most sustainable, and on balance, most suitable locations, against the Districts settlement hierarchy and growth strategy. For example, urban areas, or where flood risk mitigation could be accommodated, and where other sites on balance, against the assessment, had a greater negative impact.

⁵ NPPF 2021 paragraph 161. All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

⁶ NPPF 2021 paragraph 164. The application of the exception test should be informed by a strategic or site specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that: a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.

Sustainability Appraisal

To inform and guide the preparation of the Local Plan a Sustainability Appraisal has been undertaken. The Appraisal focuses on the likely environmental effects of the Local Plan whilst also considering a range of matters extending to social and economic impacts. As part of the environmental effects, the sources of flood risk were considered by identifying the extent and level of risk within the District and the sites impacted. The sites and level of flood risk upon them was then assessed against the objectives of the Local Plan and the range of other planning matters including proposed policies within the Local Plan. The Sustainability Appraisal identified no fundamental constraints at individual site level that would prevent sites from coming forward. It concluded that on all sites impacted by flood risk there was considered to be scope to avoid or significantly mitigate the impact through the policies in the Local Plan.

Process

The diagram below illustrates the Councils approach to the Sequential Test of sites identified through the Plan making process. The findings of this process are outlined below.

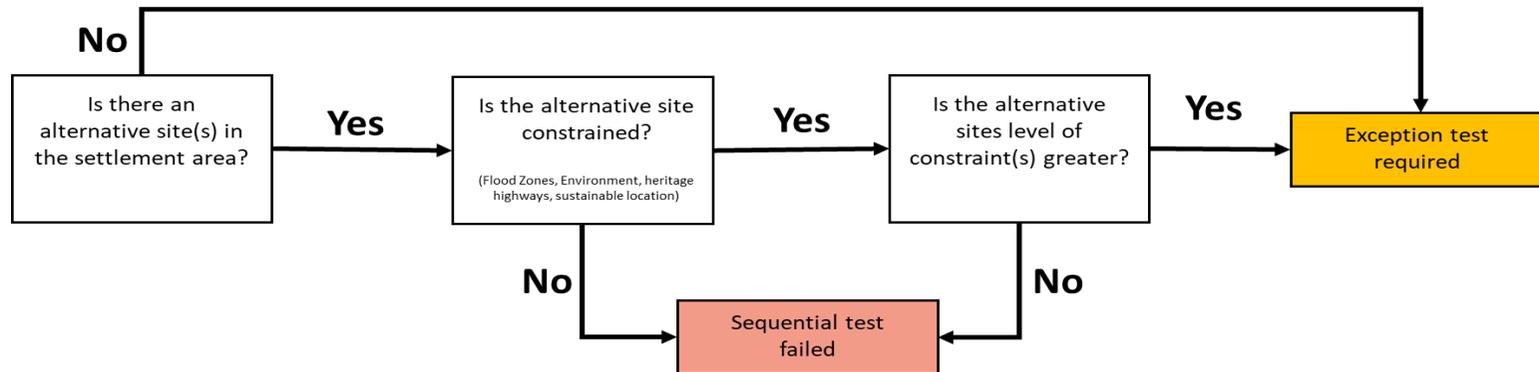


Diagram 1. Sequential Test process of sites in Flood Zone 2 and 3

Application of the Sequential Test

Officers have applied the Sequential Test to the proposed site allocations (housing, employment and Gypsy and Traveller pitches) in the Local Plan, based on the findings of the Level 2 SFRA and the results of the assessment are set out below:

Development Proposed in Flood Zone 1 and with a Low Chance of Surface Water Flooding

There were 103 sites considered in the Level 2 SFRA, of which 81 have been identified as being in Flood Zone 1 and at low risk of surface water flooding. These sites are considered to meet the requirements of the Sequential Test and are subsequently considered sites that avoid flood risk to people and property.

Sites in Flood Zone 1 and at 'very low' risk of flooding, smaller than 1 ha				
Reference	Site Address	Settlement	Site area (ha)	Capacity
DM10	Romany Acres, Caravan, Romany Acres, Belsey Lane, Ewell Minnis CT15 7DY	Ewell Minnis	0.25	4
TC4S026	Military Road	Dover	0.11	9
DM10	Plot 2B Bluebell Place (Bluebell Place), Ham, Eastry, CT13 0ED	Eastry	0.10	1
DM10	Plot 1A, Land at Hay Hill (The Oaklands), Ham, Eastry, CT13 0ED	Eastry	0.11	2
ASH015	Former Council Yard, Molland Lea, Ash	Ash	0.16	5
DM10	Plot 3 Strawberry Place (1 Strawberry Place), Ham, CT13 0ED	Eastry	0.19	2

TC4S028	Peverell Road	Dover	0.19	6
TC4S030	Colton Crescent	Dover	0.2	10
RIN004	Ringwould Alpines, Dover Road, Ringwould	Ringwould	0.22	5
DOV019	Albany Place Car Park, Dover	Dover	0.28	15
DOV008	Land adjoining 455 Folkestone Road, Dover	Dover	0.34	5
DOV030	Land at Durham Hill, Dover	Dover	0.34	10
ASH011	Gulston, Ash	Ash	0.78	10
SAN019	Sydney Nursery, Dover Road, Sandwich	Sandwich	2.05	10
ASH003	Land south of Mill Field	Ash	0.55	8
TC4S023	Land adjacent to Cross Farm	Eastry	0.44	10
CAP009	Longships, Cauldham Lane, Capel le Ferne	Capel le Ferne	0.49	10
TC4S082	Land Adjacent Mill House, Shepherdswell	Shepherdswell	0.58	10
STM007	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site B)	St Margarets at Cliffe	0.63	18
STM008	Land to the west of Townsend Farm Road, St Margaret's at Cliffe (Site A)	St Margarets at Cliffe	0.63	18

TC4S074	Land adjacent Courtlands	Kingsdown	0.71	5
CAP013	Land at Cauldham Lane, Capel le Ferne	Capel le Ferne	0.76	50
GTM003	Land to the east of Northbourne Road, Great Mongeham	Great Mongeham	3.33	10
TC4S076	Statenborough Farm, Eastry	Eastry	0.82	0.81ha
WOR009	Land to the East of former Bisley Nursery, The Street, Worth	Worth	0.83	15
WIN003	Land adjacent to Staple Road	Wingham	0.83	20
SHE013	Land around Coldred	Shepherdswell	0.83	5
Sites in Flood Zone 1 and at 'very low' risk of flooding, greater than 1 ha				
RIN002	Land at Ringwould Alpines, Dover Road, Ringwould	Ringwould	1.01	10
NON006	Prima Windows, Easole Street/Sandwich Road, Nonington	Nonington	1.14	35
WOO006	Land south of Sandwich Road, Woodnesborough	Woodnesborough	3.15	10
EYT008	Land on the southeastern side of Roman Way, Elvington	Eythorne and Elvington	1.65	50
SHE004	Land at Shepherdswell, between St Andrew's Gardens, Mill Lane and Meadow View Road	Shepherdswell	5.46	40
EYT012	Sweetbriar Lane, Elvington	Eythorne and Elvington	1.85	50

STM010	Land located between Salisbury Road and The Droveaway, St Margaret's-at-Cliffe	St Margarets at Cliffe	2.72	10
ELR4	Aylesham Development Area	Aylesham	4.2	
KIN002	Land at Woodhill Farm, Ringwould Road, Kingsdown	Kingsdown	3.46	50
WIN014	Footpath Field, Staple Road, Wingham	Wingham	3.60	50
LAN003	Land adjacent Langdon Court Bungalow, The Street, East Langdon	Langdon	4.68	40
Sites in Flood Zone 1 with <40% of the site at risk of surface water flooding				
TC4S039	Chapel Hill, Eythorne	Eythorne and Elvington	0.21	5
STA004	Land at Durlock Road, Staple	Staple	0.24	3
AYL001	Land at Dorman Avenue North, Aylesham	Aylesham	0.31	9
DOV006	Land at Dunedin Drive (south), Dover	Dover	0.37	8
SHE008	Land off Mill Lane, Shepherdswell	Shepherdswell	0.38	10
AYL002	Land at Boulevard Courrieres, Aylesham	Aylesham	0.61	17
WOO005	Beacon Lane Nursery, Beacon Lane, Woodnesborough	Woodnesborough	1.03	5
PRE003	Apple Tree Farm, Stourmouth Road	Preston	0.76	5

DOV022B	Land in Coombe Valley, Dover	Dover	0.91	40
PRE016	Site north of Discovery Drive, Preston	Preston	1.10	20
STM006	Land at New Townsend Farm, Station Road, St Margaret's	St Margaret's at Cliffe	13.35	10
TC4S050	Sherley's Farm	St Margarets at Cliffe	1.49	1
STM003	Land adjacent to Reach Road bordering Reach Court Farm and rear of properties on Roman Way	St Margarets at Cliffe	3.57	40
ASH014	Land to the south of Sandwich Road, Ash	Ash	3.34	60
DOV022E	Land in Coombe Valley, Dover	Dover	3.69	220
EAS002	Land at Buttsole Pond, Lower Street, Eastry	Eastry	3.93	80
CAP006	Land to the east of Great Cauldham Farm, Capel le Ferne	Capel le Ferne	6.35	50
EYT003	Land adjoining Terrace Road, Elvington	Eythorne and Elvington	8.07	150
DEA008	Land off Cross Road, Deal	Deal	8.73	100
TC4S083	The Citadel, Western Heights, Dover	Dover	14.82	TBD
TC4S120	WCBP Potential Phase 4	Whitfield	27.71	TBD
	Tilmanstone Spoil Tip, Elvington	Eythorne and Elvington	TBD	TBD

ELR7	White Cliffs Business Park Phases I-III	Whitfield	54.7	
AYL005	Land off Holt Street, Snowdown, Aylesham	Aylesham	41.77	40
GUS002	Connaughts Barracks, Dover	Dover	54.98	300
WIN004	Land adjacent to White Lodge, Preston Hill	Wingham	0.31	8
ALK003	Land at Short Lane, Alkham	Alkham	0.32	10
TC4S027	Roosevelt Road	Dover	0.32	10
CAP011	Former Archway Filling Station, New Dover Road, Capel le Ferne	Capel le Ferne	0.66	10
SHE006	Land west of Coxhill Road, Shepherdswell	Shepherdswell	0.82	10
EAS009	Eastry Court Farm, Eastry	Eastry	0.84	5
TC4S008	Bridleway Riding School, Station Road	Deal	1.09	25
DOV026	Westmount College, Folkestone Road, Dover	Dover	1.43	60
EYT001	Land at Monkton Court Lane	Eythorne and Elvington	1.94	20
PRE017	Site north-west of Appletree Farm, Stourmouth Road, Preston	Preston	2.53	40
SAN013	Land adjacent to Sandwich Technology School, Deal Road, Sandwich	Sandwich	3.43	40

WAL002	Land at Rays Bottom between Liverpool Road and Hawksdown	Walmer	4.44	50
ASH004	Land to the north of Molland Lane, Ash	Ash	4.46	110
SHO002	Land southwest of Sandwich Road, Sholden	Sholden	23.68	100
TC4S092	Fort Burgoyne	Dover	7.69	TBD
AYL004	Farmland lying to the north of Aylesham and to the west of the B2046 (Adisham Road)	Aylesham	36.35	500
AYL003	Land to the south of Spinney Lane, Aylesham	Aylesham	132.22	640
WHI008	Whitfield Urban Expansion	Whitfield	310.12	5575

Development Proposed in Flood Zone 1 with a High Chance of Surface Water Flooding

Of the 103 sites considered in the Level 2 SFRA, 6 have been identified as being in Flood Zone 1, but with a high chance of surface water flooding.

Sites Flood Zone 1 with a High Chance of Surface Water Flooding				
Reference	Site Address	Settlement	Site area (ha)	Capacity
TC4S044	Halfacres, Short Lane, Alkham, CT15 7BZ	Alkham	0.17	3
DOV022C	Land in Coombe Valley, Dover	Dover	0.37	20
SAP2	Land to the south of Alkham Valley Road / land to the rear of The Meadows, AVR, Alkham, CT15 7EW	Alkham	0.86	10

GOO006	Land adjacent to Short Street, Chillenden	Goodnestone	1.02	5
LYD003	Land adjacent to Lydden Court Farm, Church Lane, Lydden	Lydden	2.18	30
EYT009	Land to the east of Terrace Road, Elvington	Eythorne and Elvington	10.34	150

The majority of sites proposed to be allocated in the Plan are in Flood Zone 1 and therefore pass stage 1 of the sequential test for Local Plan preparation. However, these sites do not fully meet the housing requirement set out in the Local Plan and therefore other sites in Flood Zones 2 and 3 have also had to be considered. This is due to two main reasons: the first being the fact that the Council have been unable to identify a sufficient supply of suitable sites, through the HELAA process within Flood Zone 1, due to other planning considerations and constraints that have had to be weighed against flood risk; and second due to the highly constrained nature of the Districts three most sustainable settlements (Dover, Deal and Sandwich). As a result of this, sites located within, or partially within, Flood Zones 2 and 3 have been considered as part of the preparation of the Local Plan, where, on balance, they are less constrained on other planning considerations, are sustainably located and offer opportunities for the regeneration of brownfield land.

Development Proposed in Flood Zone 2

There has been 1 site identified as located within Flood Zone 2.

Sites located in Flood Zone 2					
Reference	Site Address	Settlement	Site area (ha)	Capacity	% of site in Flood zone
WOR006	Land to the east of Jubilee Road	Worth	1.27	10	46.78

One site has been considered in Flood Zone 2 due to its sustainable location adjacent to the settlement of Worth. The site also has lower levels of impact on other planning matters than alternative sites in the settlement area. The site is classed as more vulnerable and therefore not subject to the exceptions test. No further sites that are just in Flood Zone 2 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zones 2,3 and 3b.

Development Proposed in Flood Zones 2, 3, and 3b

There have been 13 sites identified as been located or partially located within Flood Zones 3, 3 and 3b.

Sites located in Flood Zones 2 and 3										
Reference	Site Address	Settlement	Site area (ha)	Capacity	Flood Zone 2	% of site in Flood zone 2	Flood Zone 3	% of site in Flood zone 3	Flood Zone 3b	% of site in Flood zone 3b
SAN023	Land at Archers Low Farm, St George's Road, Sandwich	Sandwich	2.19	40	Y	0.45	Y	2.03	N	
NOR005	Betteshanger Colliery, Betteshanger, Deal	Deal	20.69	210	Y	0.23	Y	4.88	N	
SAN007	Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Sandwich	1.58	35	Y	11.68	Y	10.51	N	
ELR1	Ramsgate Road, Sandwich	Sandwich	81.6	TBD	Y	7.05	Y	34.93	Y	8.19
SAN004	Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Sandwich	3.30	40	Y	9.97	Y	42.18	N	
ELR2	Discovery Park Enterprise Zone, Sandwich	Sandwich	77.04	TBD	Y	13.69	Y	79.13	Y	1.88
SAN006	Sandwich Highway Depot, Ash Road, Sandwich	Sandwich	2.09	32	Y	0.48	Y	96.16	N	
SAN008	Woods' Yard, rear of 17 Woodnesborough Road, Sandwich	Sandwich	0.70	35	Y	27.26	Y	69.85	N	
DOV028	Charlton Shopping Centre, High Street, Dover	Dover	0.63	100	Y	7.39	Y	0.28	Y	0.23

DOV018	Mid Town	Dover	5.99	100	Y	16.85	Y	43.00	Y	8.32
DOV023	Buckland Mill, Dover	Dover	2.38	124	Y	58.86	Y	7.46	Y	5.83
DOV017	Dover Waterfront	Dover	12.27	263	Y	4.09	Y	64.24	Y	50.33
	Bench Street	Dover	0.99	TBD	Y	5	Y	5	N	

These sites have been considered as part of the plan making process for a number of reasons:

- The site is sustainably located either within, or in close proximity to the District's main settlements of Dover Town and Sandwich and is in accordance with the growth strategy set out in the Local Plan;
- The site is previously developed;
- The site is an existing land allocation - Dover Waterfront, Bench Street and Mid Town Dover;
- The site has existing planning consent for either housing, employment or mixed use development - Discovery Park, Sandwich, Buckland Mill Dover and Betteshanger Colliery, Deal;
- The site offers significant regeneration opportunity;
- The site is relatively unconstrained in other terms and would have low levels of impact in relation to other planning matters; and
- The limited availability of other sites, which are not significantly constrained, in these locations.

Of the sites considered in Flood Zones 2, 3 and 3b the following will need to be subject to the exceptions test: NOR005, SAN007, ELR1, SAN004, ELR2, SAN006, SAN008, DOV028, DOV018, DOV023, DOV017 and Bench Street Dover.

No further sites that are in Flood Zones 2 and 3 have been identified through the HELAA process, and therefore the Council has had to move to the next stage of the sequential test process and look at sites in Flood Zone 3.

Development Proposed in Flood Zone 3

There have been 3 sites identified as been located or partially located within Flood Zone 3.

Sites located in Flood Zone 3

Reference	Site Address	Settlement	Site area (ha)	Capacity	Flood Zone 3	Flood zone 3 %
TC4S032	Ethelbert Road garages	Deal	0.09	5	Y	100.00
TC4S047	104 Northwall Road, Deal	Deal	0.28	8	Y	100.00
ELR3	Sandwich Industrial Estate	Sandwich	22.9	TBD	Y	100.00

The three sites located within Flood Zone 3 have been considered due to their sustainable location within, or partially within the settlements of Deal and Sandwich and their low levels of impact on other planning matters. Further, Ethelbert Road and Sandwich Industrial Estate are both brownfield sites and 104 North Wall Road is partially brownfield, and the redevelopment of these sites provides the potential for regeneration in those locations.

Of the sites considered in Flood Zone 3 the following will need to be subject to the exceptions test: TC4S032 and TC4S047.

Application of the Exception Test

The NPPG provides detail on the type of development, by flood zone, the exception test should be applied to⁷. The exception test should demonstrate that the proposed development of a site would provide wider sustainability benefits to the community that outweigh the flood risk; and will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

The SFRA 2 has identified 14 sites within Flood Zones 2 and 3 and 2 sites in Flood Zone 3 that should be subject to the Exception Test. It is considered that the 14 sites subjected to the exception test are the most suitable and available sites that provide sustainability benefits to the community that outweigh the flood risk. The table below set out the SFRA2 recommendations for each site, how they have been adapted to Policy in the Local Plan and the concluding benefits that allocating each site brings.

⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575184/Table_3_-_Flood_risk_vulnerability_and_flood_zone_compatibility_.pdf

Site	Type of Development/ Level of vulnerability/ Flood Zone	Sustainability benefits to the community that outweigh flood risk	Development will be safe for its lifetime	Local Plan Policy
NOR005 Betteshanger Colliery, Betteshanger, Deal	Housing More vulnerable FZ 2 & 3	This site now has planning permission and therefore will not be allocated in the Local Plan. The exception test is therefore not required.	N/A	N/A
SAN007 Land known as Poplar Meadow, Adjacent to 10 Dover Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are also in flood zones and on balance, taking into account other planning considerations, are less suitable for development.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required. Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion. Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable.	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.

			<p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 16m of a tidal waterbody or tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit.</p> <p>When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defences upgrades should be shared amongst the beneficiaries.</p>	
ELR1 Ramsgate Road, Sandwich	Employment Less Vulnerable FZ 2 & 3b	Site is not proposed to be allocated in the Local Plan. The exception test is therefore not required	N/A	N/A
SAN004 Land south of Stonar Lake and to north and east of Stonar Gardens, Stonar Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, being partially within the Sandwich settlement confine and adjacent to existing residential and commercial uses. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. The	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD's should be provided in accordance with Local Plan Policy CC6.</p>

		<p>site is less constrained than the alternative available sites and offers the opportunity for regeneration.</p>	<p>Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>When developing a scheme, the condition of any adjacent defences should be taken into account and consideration given to upgrading the defences to maintain, or further, the protection offered to the site and surrounding area. The cost associated with defence upgrades should be shared amongst the beneficiaries.</p>	
<p>ELR2 Discovery Park Enterprise Zone, Sandwich</p>	<p>Commercial Less vulnerable FZ 2 & 3b</p>	<p>The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. Existing brownfield site with viable employment uses. Site benefits from existing planning permission for mixed use development including employment, commercial and housing.</p> <p>The site is proposed for intensification to meet the Districts need for employment land. The site is less constrained than other available sites for employment use and has greater potential for intensification than the alternative sites.</p> <p>The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>During all three modelled scenarios there are only localized areas of surface water accumulation shown within the highways and against the existing buildings. This could be attributed to topographic depressions.</p> <p>A detailed FRA is required.</p> <p>Suds should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance.</p> <p>All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site.</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised.</p>	<p>Site isn't allocated in the Local Plan as already has planning permission. Any future applications to be determined against Local Plan Policy CC5 - Flood Risk and CC6 - SuDs.</p>

		significantly mitigate any negative effects through the policies in the Local Plan.	Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resistance and resilience measures should be included for inclusion. The EA should be consulted where development is proposed within 16m of a tidal waterbody or tidal defence infrastructure to obtain consent via a Flood Risk Activity Permit.	
SAN006 Sandwich Highway Depot, Ash Road, Sandwich	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. The site is less constrained than the alternative available sites and the site offers the opportunity for regeneration.	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions.	Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.
SAN008 Woods' Yard, rear of 17	Housing More vulnerable FZ 2 & 3	The site is in Sandwich, which is one of the District's three main towns and therefore one of the most sustainable locations for	The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –	Site allocation policy for this site includes criteria to manage flood risk and

Woodnesborough Road, Sandwich		<p>growth due to access to employment, services and transport. The site is previously developed and in a sustainable location, adjacent to the settlement confine of Sandwich and in close proximity to the train station, town centre and green infrastructure. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. Many of the available alternative sites in the Sandwich area are in flood zones and are less suitable for development. The site offers the opportunity for regeneration.</p>	<p>A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions</p>	<p>requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
DOV028 Charlton Shopping Centre, High Street, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is previously developed, sustainable located within the urban area and has the opportunity to provide regeneration to the centre of Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required including a comprehensive investigation into surface water flood risk. All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>

		<p>negative effects through the policies in the Local Plan. It is considered that it is less constrained and more sustainably located than alternatives sites not proposed in the Local Plan.</p>	<p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	
DOV018 Mid Town, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainably located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires detailed flood modelling to be undertaken and a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuDs should be provided in accordance with Local Plan Policy CC6.</p>

			<p>increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	
DOV023 Buckland Mill, Dover	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects.</p> <p>Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p> <p>A detailed FRA is required</p> <p>All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site</p> <p>The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised.</p> <p>Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable</p> <p>Flood resilience and resistance measures should be considered for inclusions.</p> <p>Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area.</p> <p>The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5.</p> <p>SuD s should be provided in accordance with Local Plan Policy CC6.</p>
DOV017 Dover Waterfront	Housing More vulnerable FZ 2 & 3	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime –</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and</p>

		<p>to access to employment, services and transport. The site is an existing allocation that is brownfield and undergoing site wide regeneration that in later stages will include homes. The site is providing regeneration to Dover Town. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>A detailed FRA is required All major development will require a SWMS to be provided to show how the SuDs will be included to manage surface water runoff from the site The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of fluvial waterbody to obtain consent via a Flood Risk Activity Permit (FRAP)</p>	<p>requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
Bench Street Dover	Mixed Use More Vulnerable	<p>The site is in Dover Town, which is the District's main town and therefore the most sustainable location for growth due to access to employment, services and transport. The site is an existing allocation that is brownfield. The site has the opportunity to provide regeneration to the centre of Dover Town, an area of high deprivation. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment,</p>	<p>Development to be located in the lowest areas of flood risk on the site. Internal layout of buildings particularly where floor levels cannot be raised should be located in areas at lowest risk of flooding. A Surface Water Management Strategy to be produced to show how SuDS will be included to manage surface water runoff from the site</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>

		<p>amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>		
TC4S032 Ethelbert Road garages	Housing More vulnerable FZ3	<p>The site is in Deal, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment, services and transport. The site is previously developed and in a sustainable location being located within Deal urban area. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained, more sustainable located than the alternatives sites not proposed in the Local Plan and offers the opportunity for regeneration.</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required Developers should consult the relevant water authority at an early stage to ensure that there will be sufficient water capacity in the wastewater system to accommodate the development and any upgrades are carried out where necessary. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to buildings particularly where floor levels cannot be raised. Floor levels should be raised above the design floor level, including the Environment Agency's recommended additional freeboard requirements where practicable. Flood resilience and resistance measures should be considered for inclusions.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
TC4S047 104 Northwall Road, Deal	Housing More vulnerable FZ3	<p>The site is in Deal, which is one of the District's three main towns and therefore one of the most sustainable locations for growth due to access to employment,</p>	<p>The SFRA 2 has recommended the following mitigation to ensure the development will be safe for its lifetime – A detailed FRA is required.</p>	<p>Site allocation policy for this site includes criteria to manage flood risk and requires a site-specific</p>

		<p>services and transport. The site is partially previously developed and in a sustainable location being located in part within Deal urban area. The site generally scored positively in the SA, when compared to other sites, offering benefits around increased access to housing, employment, amenities and transport, that would outweigh any negative effects. Furthermore it is considered that there is scope to avoid or significantly mitigate any negative effects through the policies in the Local Plan. It is considered that the site is less constrained and more sustainable located than the alternatives sites not proposed in the Local Plan.</p>	<p>SuDs should be considered to be included within the development where possible, in accordance with the NPPF and planning practice guidance. All major development will require a Surface Water Management Strategy to be produced to show how the SuDs will be included to manage surface water runoff from the site. The sequential Approach should be applied to the layout of the site by locating the most vulnerable element in the lowest risk areas. The sequential approach should also be applied to the internal layout of buildings particularly where floor levels cannot be raised. Floor levels should be raised above the maximum depth of floods from surface water, including or additional freeboard where practicable. Flood resilience and resistance measures should be considered for inclusions. Suitable mitigation should be provided where development would displace floodwater and increase the risk of flooding to the surrounding area. The EA should be consulted where development is proposed within 8m of a main river to obtain consent via a Flood Risk Activity Permit (FRAP) The LPA should be consulted prior to the commencement of any works to obtain consent for any development proposed within 8m of any ordinary watercourse. Where the watercourse falls within the RSIDB area, the RSIDB should be consulted to obtain consent.</p>	<p>Flood Risk Assessment to be carried out in accordance with Policy CC5. SuDs should be provided in accordance with Local Plan Policy CC6.</p>
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Conclusion

Managing flood risk has been a key consideration in the Plan making process. There were 103 sites considered in the Level 2 SFRA, of which 14 sites were required to be assessed through the exception test. Sites located within flood zones have been assessed through the SFRA 2, sequential and exception tests

with the sites then provided with actions and recommendations for flood mitigation. Those actions and recommendations have been considered in the preparation the of the Local Plan and embedded within the climate change and site allocation policies. The 14 sites subject to the exception test were found to be the most suitable of those made available through the HELAA in the Districts settlement areas and are considered to provide sustainability benefits to the community that outweigh the flood risk.