



PRE-PLANNING STATEMENT

Residential Re -development of Crushintons

Land at Crushintons Ltd, Sandfield Farm, Northwall Road, Deal, CT14 6PP



Prepared by Hume Planning Consultancy Ltd.

On Behalf of: Kentish Projects Limited

Our Reference: HPC/1552

Date: December 2023

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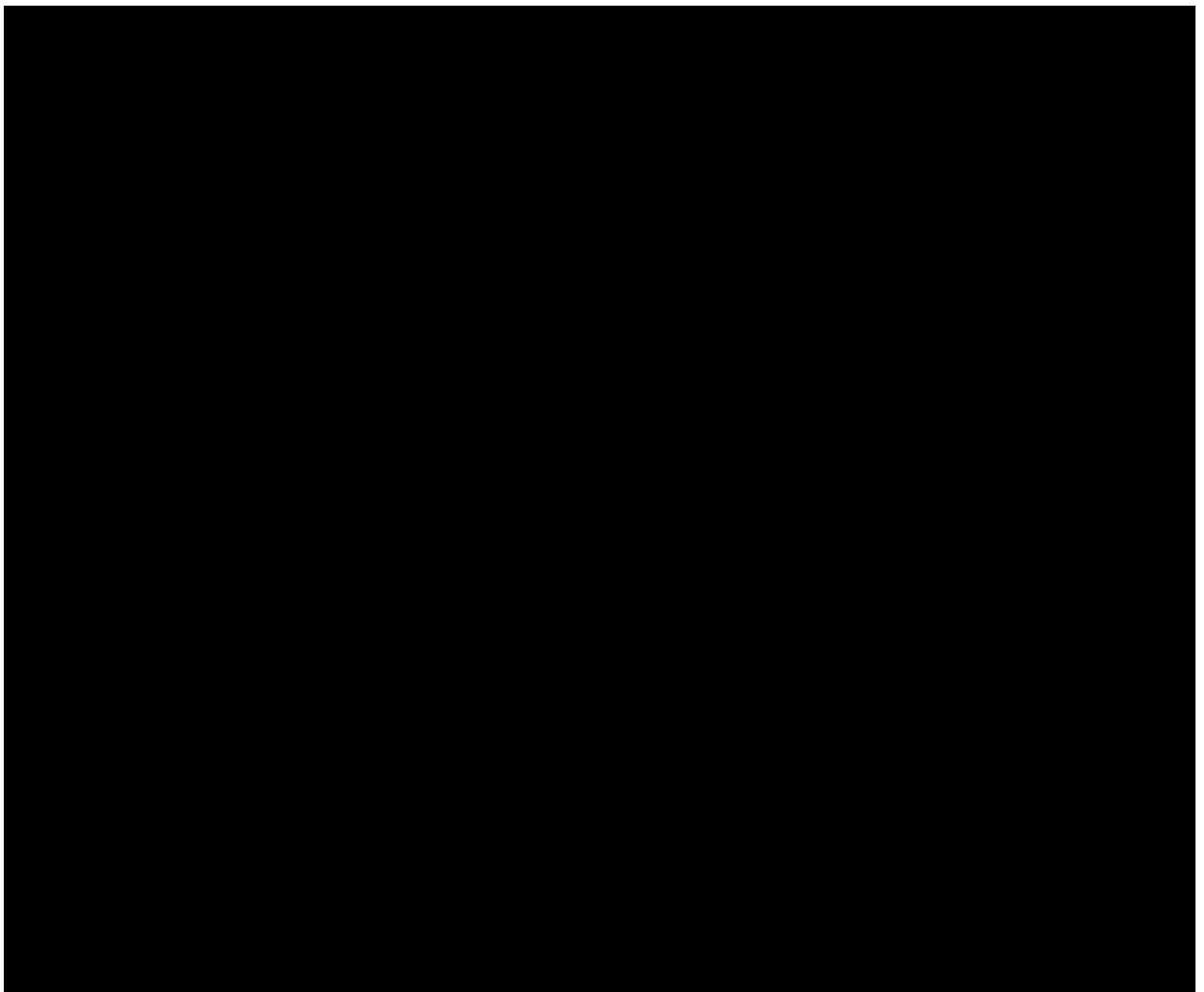
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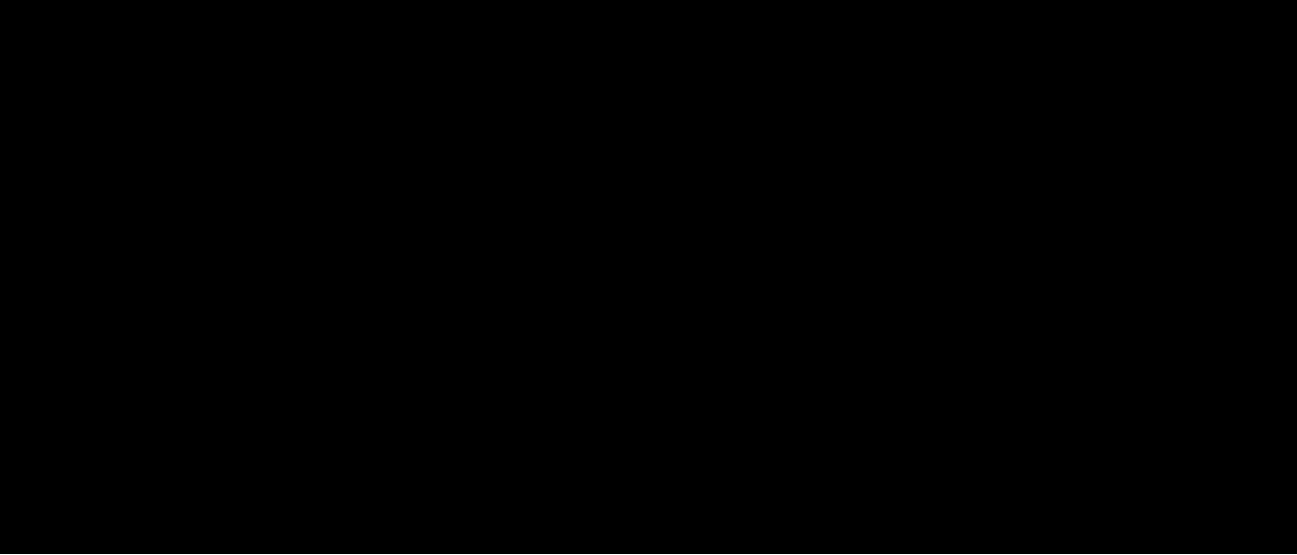
1. Introduction

- 1.1 This Statement has been prepared in support of a pre-application planning enquiry to Dover District Council (DDC) for residential development on land at Crushintons Ltd (Aggregate Recycling Centre and Crusher Hire), Sandfield Farm, Northwall Road, Deal CT14 6PP.
- 1.2 This pre-application submission accords with paragraph 39 of the NPPF which encourages pre-application engagement, stating that 'early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties.'
- 1.3 Following the assessment of the opportunities and constraints of this site and an understanding of its context, Hume Planning Consultancy has identified a number of key parameters that it is considered, influence the development potential of the site. These factors are outlined and assessed below in the context of the development plan and other relevant material considerations.
- 1.4 The application site comprises the curtilage of a well-established waste recycling and plant hire business located on the edge of the Deal urban area.
- 1.5 The focus of this Statement is centred on the principle of the development, specifically related to the site's location, benefits arising from the cessation of the existing use and compliance with the strategic housing objectives of the emerging local plan, considering an adjoining draft housing allocation and its suitability in respect of delivering a sustainable form of development within Flood Zone 3.

2. Site Description & Context

- 2.1 The site immediately adjoins the town of Deal, which is identified in the settlement hierarchy of the emerging Dover District Local Plan as a District Centre, this being a secondary focus for growth in the district behind Dover town. The site and the neighbouring land, including land within the urban area, falls within Flood Zone 3.
- 2.2 The site is some 1.5 ha in area, the majority of the land being brownfield in nature, comprising an assortment of former agricultural buildings and areas of despoiled land used for aggregate recycling and storage of plant and machinery. The Crushinton site has been operating in its current form since around 2006 and to a lesser degree for several years before this. A certificate of lawfulness was granted in 2015 (DOV/13/00425) authorising the change of use of the site from an agriculture to industrial use and permitting a range of activities including: the storage of recycled materials and materials used in road and drainage construction; the recycling of inert construction materials and topsoil; and the operation of a mobile concrete crusher. Hours of use were also confirmed, with activities permitted to commence on site from 7.00am Monday to Saturdays.



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- 2.3 The site is typical of other commercial operations within this part of North Deal, which function within quite a constrained environment formed by an historic tight-knit road network and neighbouring areas of medium/high density residential development. North Deal also hosts a number of community facilities including schools. The co-existence of these varied uses has placed a strain on existing roads which has tended to act as a limiter on the amount of new development that can be accommodated, with residential schemes generally only coming forward on small sites or because of the redevelopment of a brownfield/commercial site.
- 2.4 The Crushinton site lies at the (western) end of Northwall Road. Northwall Road is fronted by an assortment of terrace and semi-detached residential properties, and at its eastern end (near its junction with Western Road) by Sandown Primary School. The road terminates near the site, meaning that all traffic served by Northwall Road, including lorries and plant from the recycling centre, access/egress via the junction with Western Road. The close proximity of these vehicle movements to the primary school and residences is less than ideal. On-street parking also predominates along much of the road and neighbouring streets, including Western Road. This creates a series of pinch-points for larger vehicles, including those serving Crushintons, delaying journey times and placing further strain on the efficient operation of the road network.

3. Description of the Proposal

- 3.1 The proposal consists of the cessation of the existing Crushinton operation and the clearance and remediation of the site and an adjoining area of land within the applicants' control, to erect up to 30 dwellings with associated landscaping and biodiversity enhancements. At this stage, the layout is emerging with options informed by flood risk analysis work, given the sites position within Flood Zone 3. The latest iteration is attached but is likely to be subject to further change, following additional input from the LPA and technical team; an example of the current house type is shown below. Subject to the conclusion of the flood risk work, some living accommodation will be restricted to the first floor and above. In accordance with Environment Agency guidance, floor levels might also need to be raised as appropriate, by 300mm or increasing to 600mm for sleeping accommodation.



Figure 4. Proposed Housing Type.

Concept Design

- 3.2 While the site adjoins the Deal urban area, it also neighbours' areas of open countryside. The extent of the site area seeks to utilise the screening afforded by natural boundary features. The layout also envisages an 8m wide buffer zone to the western boundary to ensure that views into the site from the adjoining countryside are limited and result in an enhancement when compared to the sites current appearance from this area. Existing boundary screening on site will also be safeguarded and strengthened.
- 3.3 The existing site access from Northwall Road will be used to serve the site with new internal roads accessing the site interior.
- 3.4 The design/layout options provided to date have been put forward to show the current thinking and to promote discussion with the local planning authority.

4. Planning Policy Context

- 4.1 Decisions on planning applications must be made in accordance with the policies of the development plan unless material considerations indicate otherwise. In this instance, the Development Plan for the purposes of S38 (6) of the Planning and Compulsory Purchase Act (2004) comprises the adopted Dover Core Strategy (2010) and the Land Allocations Local Plan (adopted 2015) and the Kent Minerals and Waste Local Plan adopted 2020.
- 4.2 It is relevant that Dover has an emerging Local Plan for the district which covers the period to 2040. This document shows the direction of travel for emerging spatial policy within the district to meet the development requirements. The Local Plan Examination commenced in mid-November 2023.
- 4.3 In addition to the Development Plan, there is other guidance which is material to the determination of planning applications including the National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG).
- 4.4 Policy DM1 of the Core Strategy is a key policy for assessing the suitability of new residential development at urban and rural settlements. This states that development will not be permitted outside the settlement boundaries, unless justified by other development plan policies, functionally requires a rural location or is ancillary to existing development or uses. In this case, the proposed development site lies just outside the confines as defined by the Core Strategy.
- 4.5 Importantly, Policy DM1 and the settlement confines referred to within the policy were drawn up to address the evidence of housing need as of 2010, being for some 505 dwellings per year. The latest evidence (in accordance with the Government's standard method for calculating housing need) is that this requirement now stands at some 611 dwellings per year. On this basis, it is considered that the evidence base underpinning Policy DM1 is now out-of-date. Policy DM1 is therefore in tension with the NPPF and as such, can only carry limited weight.
- 4.6 The emerging policy of the draft Dover District Local Plan (Reg 19) has been prepared in light of the most recent housing need assessment. Policy SP4 of the Plan also identifies settlement boundaries and in the case of larger settlements such as Deal, allows for residential development both within and *immediately adjoining* the settlement boundaries.
- 4.7 The settlement confines, as they apply to the site and as identified by the Core Strategy and the emerging Local Plan, are shown below.

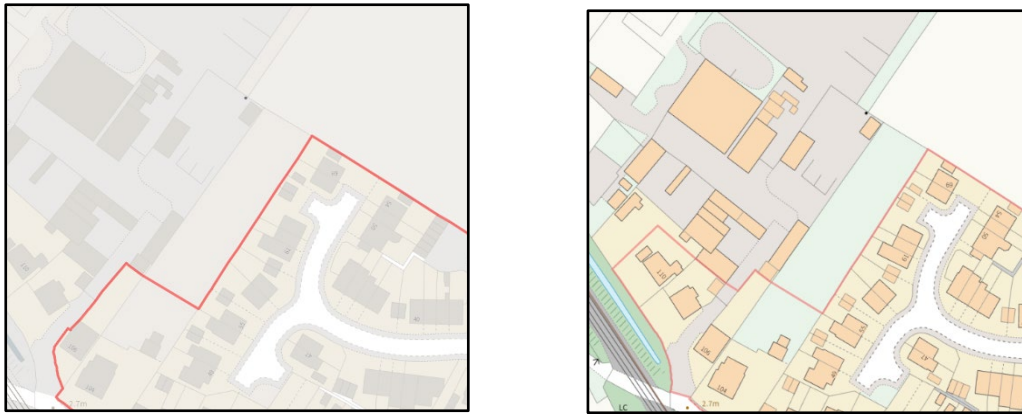


Figure 5 & 6. Settlement Confines.

Core Strategy Emerging Local Plan (Reg 19)

- 4.8 Of relevance to this proposal is the inclusion within the Emerging Plan of a site allocation (Policy SAP16) for up to 8 dwellings on a strip of land immediately to the east of the Crushinton site, shaded light green on the above extract. This proposed site allocation also falls within Flood Zone 3. Assuming this SAP16 allocation is taken forward into the adopted plan, the enquiry site will in effect *immediately adjoin* the settlement/built confines of Deal. This is considered to provide strong justification for contending that the use of the site for residential development would accord with the objectives of Policy SP4. As the allocation through SP4 acknowledges that development can take place in a manner that accommodates the requirements of Flood Zone 3, it is considered that the development on the enquiry site should be treated in like manner from a flood risk perspective.
- 4.9 A strategic objective of the emerging plan is to ensure that new development is focused at accessible and sustainable locations which can utilise existing infrastructure, facilities and services and that development contributes to the sustainability of local communities and services and supports regeneration wherever possible, making the best use of brownfield land.
- 4.10 The proposal subject of this enquiry, would involve development of a brownfield site which immediately adjoins the Deal urban area and an allocated housing site in the emerging local plan where residents of the development would have full access to the services and facilities in Deal. In this regard, it is considered that the development of the site for residential purposes would be entirely consistent with the strategic and housing growth objectives of the emerging Dover District Local Plan (Reg 19). As the Regulation 19 Plan directs a low proportion of housing allocations to Deal, despite its 'District Centre' status, this makes the support for windfall opportunities, particularly on brownfield sites which will deliver environmental enhancements, even more important to utilise.

5. Planning Evaluation & Opportunity

Principle of Development

- 5.1 It has already been identified that the current Development Plan for the District is 'out of date' in respect of addressing objectively assessed housing need. This proposal will therefore contribute to the housing supply for the district.
- 5.2 In light of the district's housing position, it is asserted that decision making in this instance should be more closely aligned with the NPPF Paragraph 11(d), which promotes the delivery of sustainably located housing development 'rather than with development plan policies that are considered 'out of date' and which focus on housing restraint. As stated above, the proposal is deemed to be consistent with the housing objectives of the emerging local plan and the specific requirements of Policy SP4.

Other Planning Benefits

- 5.3.1 The removal of the existing business, comprising the recycling (including crushing) of building material and vehicle movements and activities associated with plant hire, will result in a more neighbourly form of development within what is a predominantly residential area.
- 5.4 Reference in respect of the degree of on-street parking in the vicinity of the site and the proximity of community facilities such as Sandown School, is made above. The removal of lorries/plant from Northwall Road and other surrounding streets should improve the operation of the road network and enhance road safety and general amenity. The removal of such movements from the wider network, will also help lessen impacts at some of the most sensitive road junctions in Deal, such as the Manor Road roundabout.
- 5.5 The reduced noise and activity, and greater tranquillity arising from this proposal will also have a beneficial impact on air quality and the character and enjoyment of the adjoining open countryside, as will the provision of a tree screening buffer which will ensure an enhancement in the appearance of the site from within the wider rural area.
- 5.6 The cessation of the current industrial uses will allow for the remediation of any contaminated land. Opportunities will exist for further environmental enhancements through tree/buffer planting and the provision of biodiversity net gain.
- 5.7 In addition to contributing towards housing need, the scheme will also make provision for affordable housing in line with policy expectations.

6. Conclusion

- 6.1 In summary, the proposal involving the cessation of the existing business and the redevelopment of a brownfield site for residential purposes immediately adjoining the Deal urban area where the emerging plan (after Dover) seeks to prioritise the delivery of new housing, provides an opportunity to deliver a highly sustainable form of development – both in terms of allowing for access to facilities and services by prospective residents, and also through the potential for significant environmental gains associated with the removal of the existing use, the remediation of the site and new biodiversity/tree planting enhancements.
- 6.2 It is considered that the proposed residential allocation, through the emerging local plan on land immediately abutting the site, underlines the view that the development would constitute ‘sound planning’ which would fully accord with the strategic housing objectives of the emerging plan. While the site falls within Flood Zone 3, it is considered that the implications arising can be addressed by appropriate responses to the scheme layout and design, similar to that likely to be required on the neighbouring allocated site (which also falls within Zone 3).
- 6.3 While further work is required to interrogate the flood risk issues, the purpose of this enquiry is primarily to establish whether the Council would be willing to support the principle of the development of this site in line with the case presented above.
- 6.4 Guidance on the scope of other work necessary to support an application would also be welcomed. While discussions will be held separately with KCC Highways, the intention is to demonstrate that the removal of traffic associated with the lawful commercial use would result in an overall benefit when compared to traffic movements arising from the proposed development. That said, we would wish to be made aware of any ‘local’ factors that the LPA are aware of that could help inform the highways appraisal.
- 6.5 We look forward to receiving your input relating to the matters outlined in this Statement so that the proposals can be refined before the planning application is submitted for formal consideration.

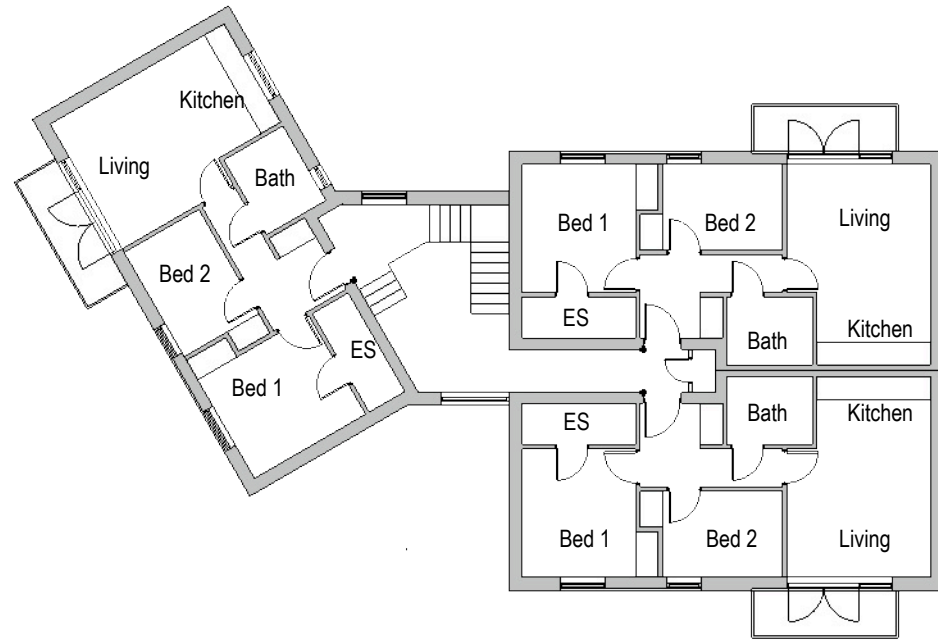
Planning Application Requirements

- 6.6 To inform the preparation of a detailed planning application, we would hope that the views of all relevant LPA officers can be sought to inform the written response. If the LPA considers that we should also seek the views of other parties to inform the application, it would be appreciated if these can be identified.

6.7 At this stage, the intention is to prepare the following reports in support of an application. Your consideration (and where appropriate, amendment/ addition) to this list would be of assistance:

- Planning and Design & Access Statement
- Full Drawing Package
- Flood Risk Assessment
- Transport Assessment
- Landscape and Visual Impact Assessment
- Ground and Contaminated Land Assessment
- Ecological Report

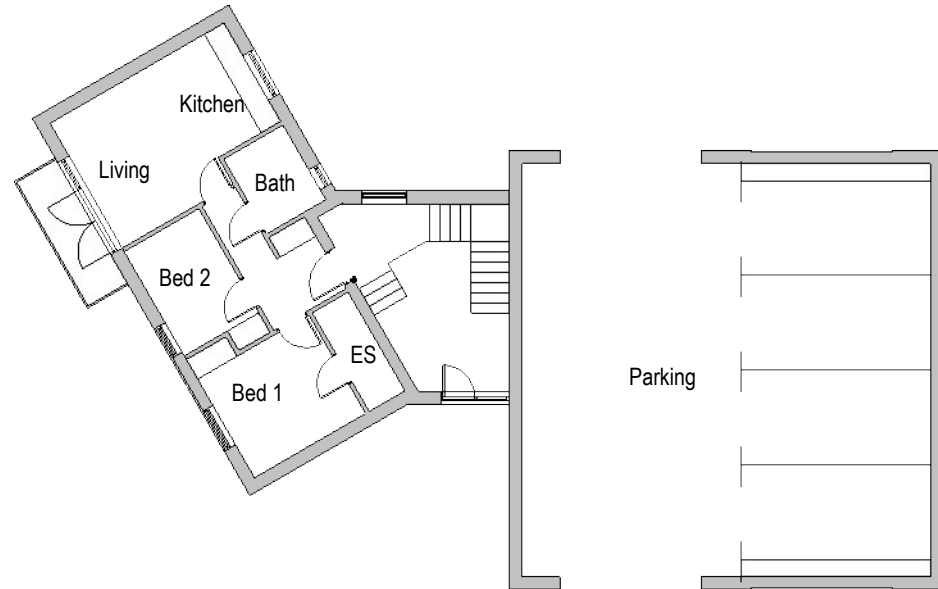




First Floor Plan



Front View



Ground Floor Plan



Rear View

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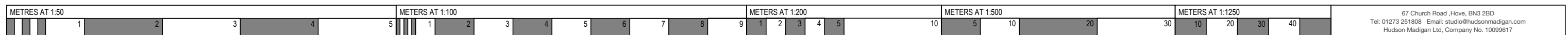
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Sandfield Farm, Northwall Road, Deal CT14 6PP

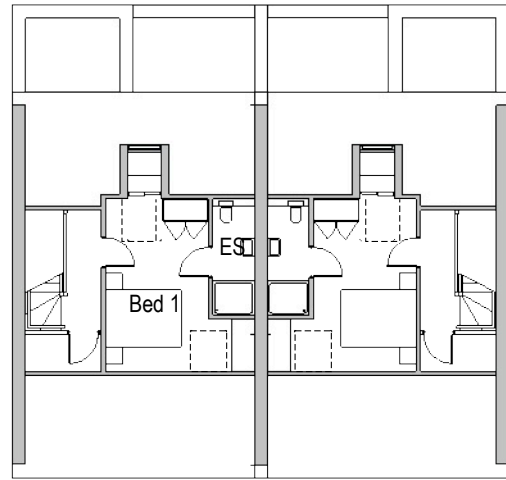
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2 Bed Apartments

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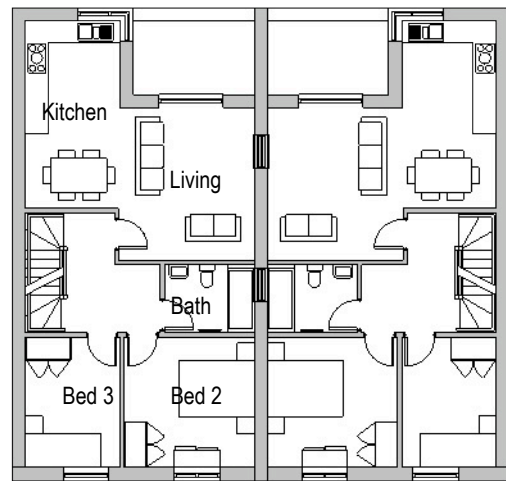
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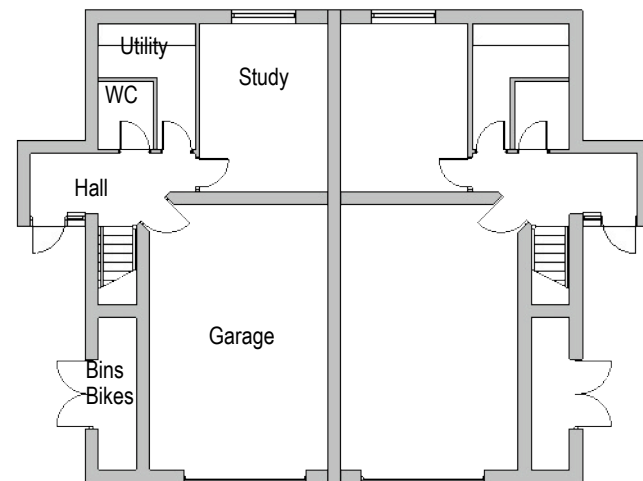
67 Church Road, Hove, BN3 2BD
Tel: 01273 251808 Email: studio@hudsonmadigan.com
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Second Floor Plan



First Floor Plan



Ground Floor Plan



Front View



Rear View

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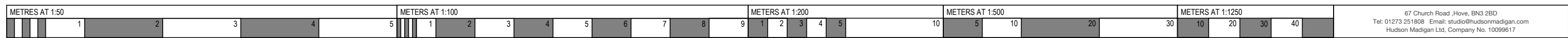
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PROJECT TITLE
Sandfield Farm, Northwall Road, Deal CT14 6PP

DRAWING TITLE
3 Bed House

DRAWING No.	REVISION
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DATE	STATUS
17/11/23	PreApp
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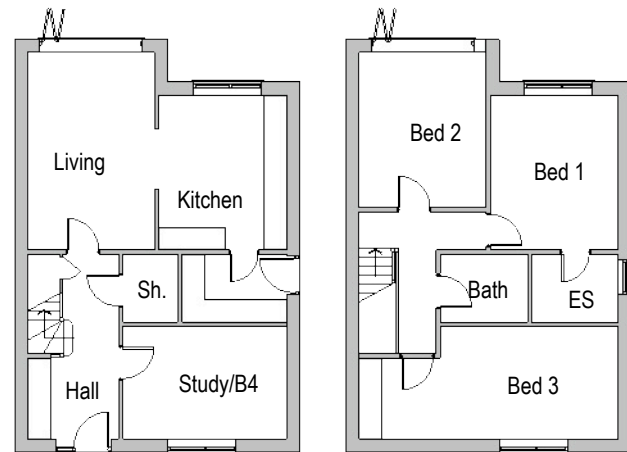
TYPICAL 3 BED HOUSE @ 1:200



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Front View



Ground Floor

First Floor



Rear View

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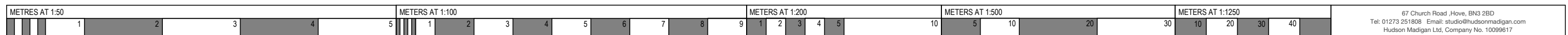
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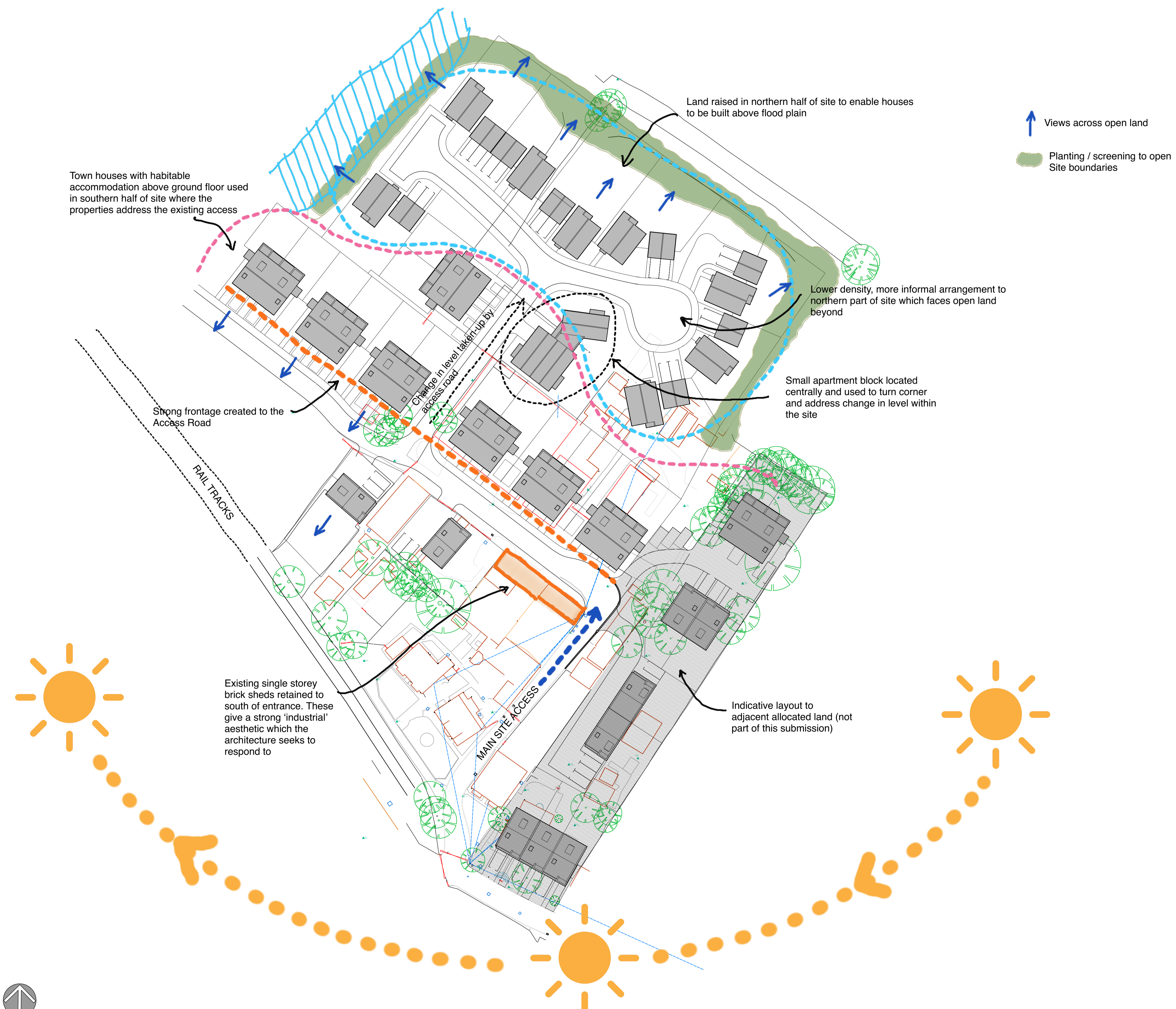
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4 Bed House

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DATE	STATUS
17/11/23	PreApp
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DRAWN	CHECKED
GM	

TYPICAL 4 BED HOUSE @ 1:200



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 3. Where reference is given to a written specification that shall take precedence over the drawing.
 4. Where two or more drawings illustrate the same element, the larger scale drawing takes precedence.
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 6. Elements that are subject to detailed design by others are purely indicative and you should make reference to the relevant information provided by those designers which will at all times take precedence over this drawing.
 7. All works are to be carried out to the satisfaction of Building Control and in accordance with current British Standards.
 8. Steelwork design to be submitted by engineers - these take precedence over these drawings and any discrepancies must be reported immediately.
 9. Full M&E design to be submitted by engineers - these take precedence over these drawings and any discrepancies must be reported immediately.
 10. Flues in walls to be surveyed prior to installation of beams.



Side Plan @ 1:500

No.	Date	Description	Drawn	Over

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PROJECT TITLE
Sandfield Farm, Northwall Road, Deal CT14

GPP

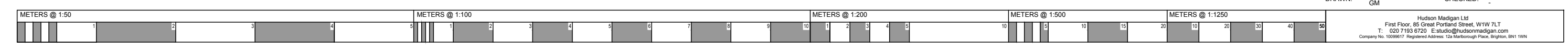
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Opportunities & Constraints

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DATE	STATUS
14.12.23	Pre-App

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DRAWN	CHECKED
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**DESIGN & ACCESS
STATEMENT**
for
**Pre Planning Advice
Application**

**Sandfield Farm, Northwall
Road, Deal CT14 6PP**

14th December 2023



DESIGN & ACCESS STATEMENT:

Sandfield Farm, Northwall Road, Deal CT14 6PP

INTRODUCTION

1. This statement is written to support our application for pre-planning advice in respect of the following proposed development:

Demolition of existing commercial buildings and construction of 28No. Proposed dwellings.

2. The site lies on the western fringes of Deal and is currently occupied by 'Crushingtons' an aggregate supplier. The site is covered by a combination of warehousing, temporary offices, materials (large piles of aggregate) plus a range of plant and machinery.

AMOUNT OF DEVELOPMENT

3. Breakdown of areas:

3.1. The total site area = 14100 sq.m Approx.

3.2. The total approximate proposed footprint of the new dwelling houses = 2483 sq.m (17.6% site coverage)

3.3. The total gross internal area of the new buildings = 4734 sq.m (refer to schedule of accommodation)

SCHEDULE OF ACCOMMODATION

Dwelling Type	G.I.A (sq.m)	No. Units	Total Area
3 Bed House	165	14	2310
2 Bed Apartment	267	4	1068
4 Bed House	132	8	1056
3 Bed House 2	150	2	300
		TOTAL AREA	4734

Notes:

1. Built-in garages to town houses are included
2. Open parking beneath apartments is excluded

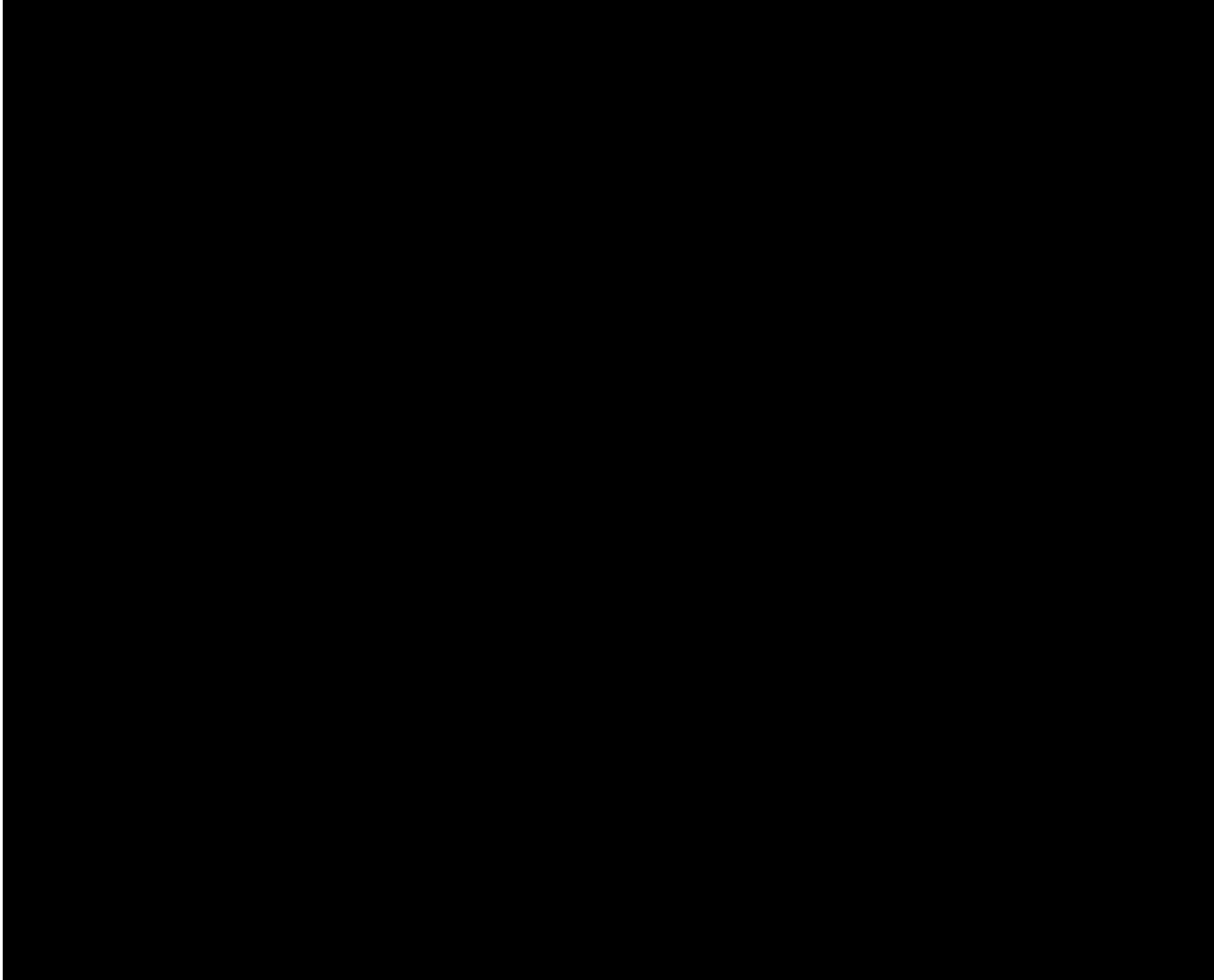
DESIGN & ACCESS STATEMENT:

Sandfield Farm, Northwall Road, Deal CT14 6PP

SCALE AND APPEARANCE

8.

5. The site context is fairly mixed with some older properties immediately to the south but newer residential development to the north east (beyond an open field) and abutting the south eastern boundary. Both areas of development are fairly standard 'developer-lead' mass housing of medium density with a mixture of mainly semi-detached and small terraces of two storey houses.
6. The proposed development has a similar density with mainly semi-detached properties to the southern half of the site and larger detached houses on the northern section which abuts the open fields. The houses are 2 - 2.5 stories with the latter being necessary in the southern section where habitable rooms need to be raised to 1st floor level to clear the flood plain. The detached houses are 2 storey with habitable accommodation at the ground floor - achieved by building-up this part of the site.
7. Architecturally the neighbouring 'modern' developments do not give any strong character to respond to but there are a small number of older buildings which have some visual interest and have informed our design proposals in terms of forms and materials.



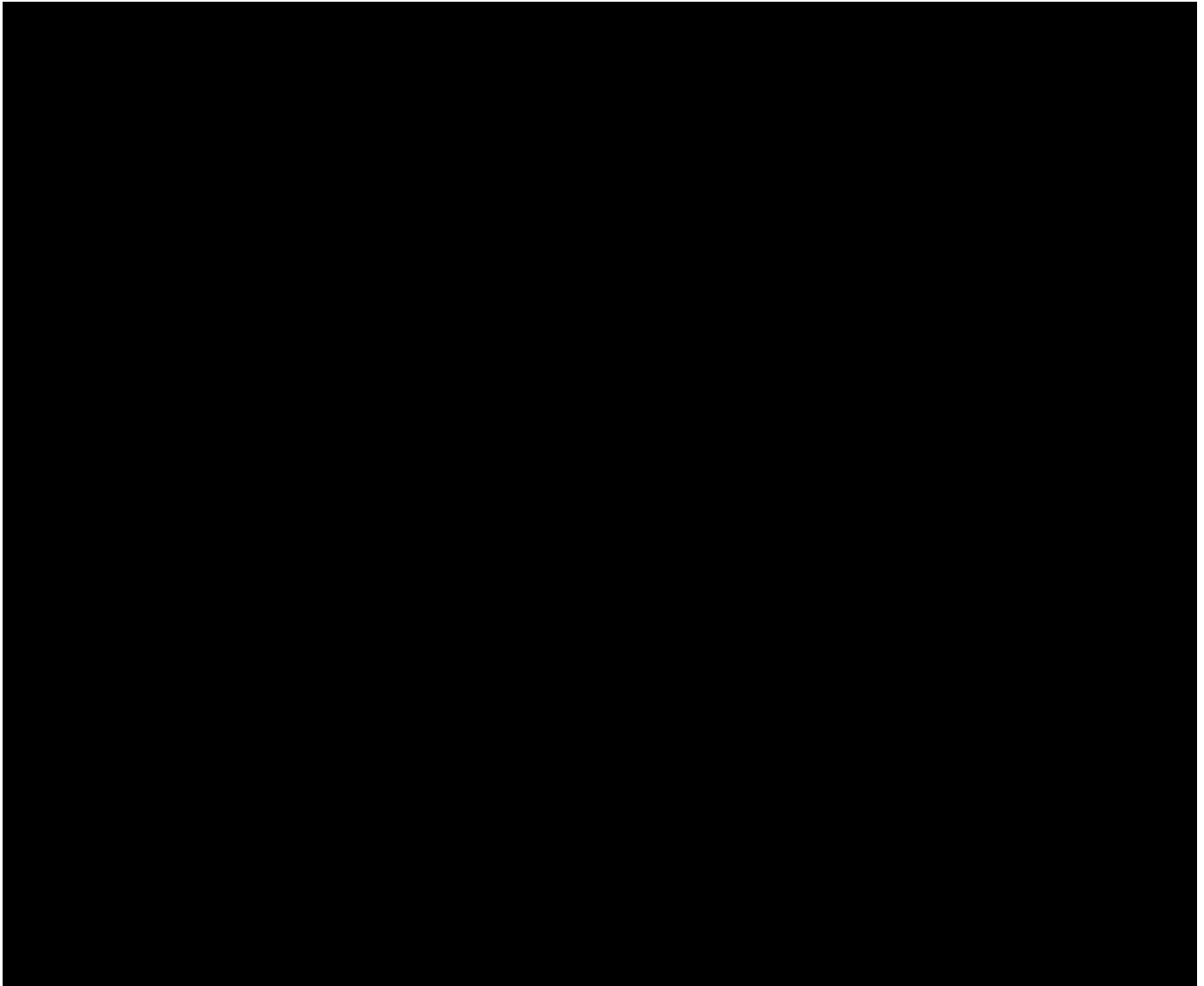
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9. We consider the existing (retained) low-level brick 'industrial' sheds adjacent to the site entrance to be of interest. The 3 bed semi-detached townhouses set opposite have been designed to respond to these with a modern take on the (small-scale) warehouse aesthetic. As the buildings change through the site, the general theme is carried through but becomes more 'domestic' in nature towards the north.
10. The proposed pallet of materials is a combination of facing brick, cement cladding boards and concrete tiles. The colours are mixed to give further variation. Doors and windows are proposed to be high-performance aluminium and composites - again to give a distinctly modern feeling.

ACCESS & SERVICING

11. Access is via the existing road from the south with turn sharply into the site where the east-west route has been retained and emphasised with the strong frontage of 3 Bed townhouses. These are split centrally by a road which rises gently to the raised part of the site at the rear where it forks into two private 'cup;-de-sacs'.



DESIGN & ACCESS STATEMENT:

Sandfield Farm, Northwall Road, Deal CT14 6PP

12. Turning for refuse and fire trucks is possible within the cul-de-sacs and it is not anticipated that bin collection areas will be required.
13. Dedicated bin stores have been designed-in to the 3 bed townhouses at ground floor. Wheelie bins can be accommodated in the back gardens of the 4 bed detached houses with access via side gates. It is anticipated that a bin storage area can be provided to the rear of the parking in the small apartment block.
14. Cycle parking can be accommodated in the ground floor garages of the 3 bed semi's, in rear gardens of the detached houses (which also have double garages) and in a dedicated secure storage area adjacent to the flats.
15. Drawing P01 indicates allocated parking, providing two spaces per house and one per flat. There are also two visitor spaces opposite the flats and further spaces can be provided once numbers have been established.
16. All dwellings will be designed to meet Part M4(2) standards although it should be noted that there are of course some limitations with the townhouses.

LANDSCAPE

17. The site occupies open, level ground with far-reaching views both in and out- particularly to the north and west. It is proposed to add screen planting along these open boundaries whilst keeping it open to the south where the development fronts the existing adjacent buildings.
18. Within the site the land will be largely given over to private amenity space with open communal areas around the central flats and fronting the cul-de-sacs in the lower density Northern half of the site.
19. A full landscape design is to be developed in due course.



Planning, Regeneration and Development Service
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www.dover.gov.uk

[REDACTED]
Hume Planning Consultancy
(Sent by email)

Contact: [REDACTED]
E-mail: [REDACTED]@dover.gov.uk
Our ref: PE/23/00131
Date: 22/2/2024

Dear [REDACTED]

Town and Country Planning Act 1990 (As Amended)

Proposal: Erection of up to 30 no. dwellings with associated landscaping and biodiversity enhancements

Location: Crushintons Ltd, Sandfield Farm, 108 Northwall Road, Deal

I write further to your inquiry received on 14th December 2023 and our meeting at the site on 30th January 2024. You wish to be advised if there is scope to erect up to 30 dwellings with associated landscaping and biodiversity enhancements at the site, and you have provided a pre-planning statement, site location plan, indicative elevations and floor plans, opportunities and constraints plan, proposed site plan and design and access statement.

Relevant Planning Policies and Guidance

The relevant planning policy is identified in the National Planning Policy Framework (NPPF) (December 2023), Dover District Council Core Strategy 2010 (CS), Dover District Council Land Allocations Local Plan 2015, the Saved Policies within the Dover District Local Plan 2002. All of these plans can be found at the following website address:
<https://www.dover.gov.uk/Planning/Planning-Policy/Home.aspx>

The Submission Draft Local Plan (2023) has been submitted to the Planning Inspectorate for examination, with the examination in person having taken place in November and December 2023. The Council is currently awaiting a response from the Inspectors, and it is likely there will be changes to the wording of some of the draft policies, with minor modifications being sought to the wording of some policies, as set out in SD06 – Schedule of additional modifications (available to view at the link below).

The Plan is at an advanced stage and is considered to be an important material consideration in the determination of applications, with the policies attracting varying weight in the planning balance, depending on their compliance with the NPPF. The plan and accompanying submission documents can be viewed at the following website address:
<https://www.doverdistrictlocalplan.co.uk/examination-home/submission-documents/submission-documents>

Planning History

DOV/03/01405 – Certificate of existing lawful use for the mixed use of land for recreational purposes for motorcross racing and agriculture – Refused

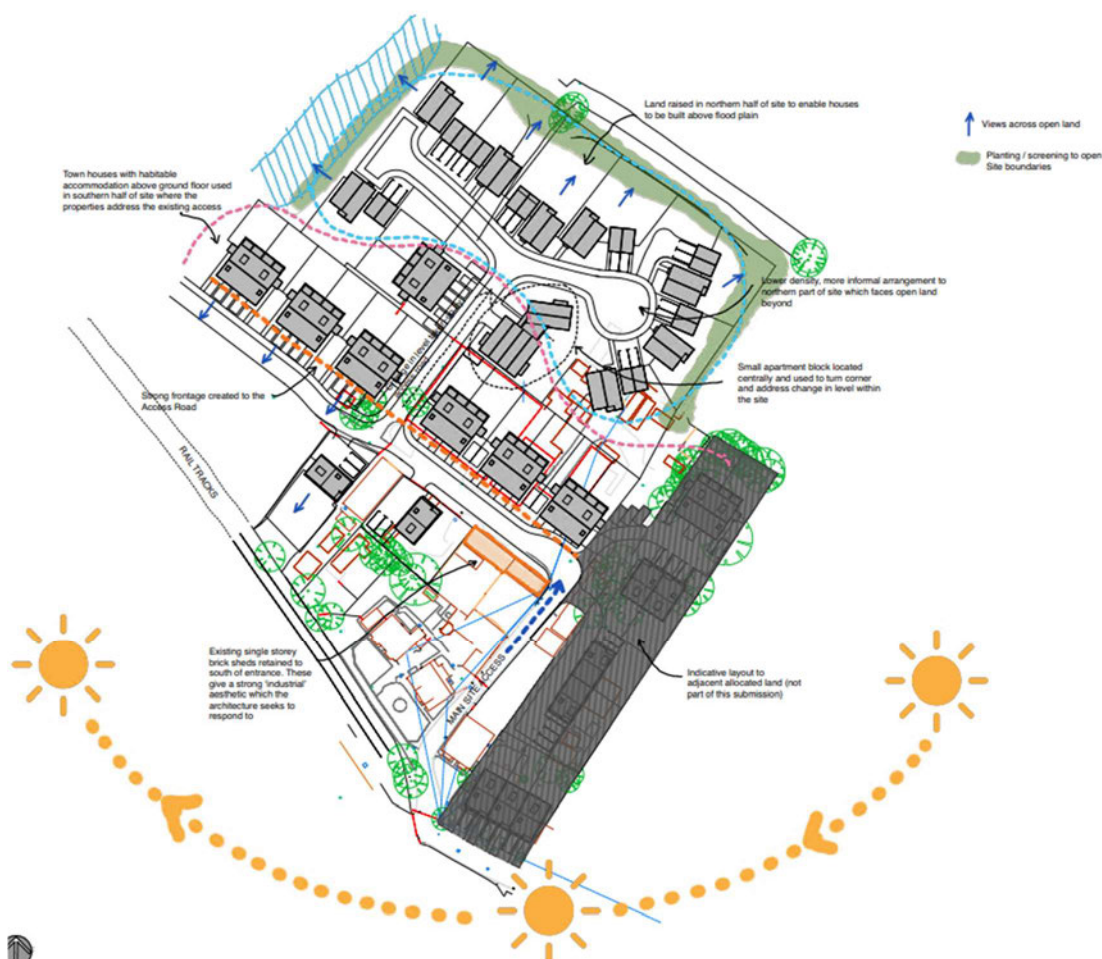
DOV/13/00425 – Certificate of lawfulness (existing) for the change of use of land from agricultural to industrial for inert and industrial waste transfer industrial station for construction waste and an area for top soil screening - Granted

Assessment

Site & Proposals

The site relates to approximately 1.5ha of land on the north side of Northwall Road, in Deal. The brownfield site contains former agricultural buildings, with land used for aggregate recycling and plant and machinery storage. The planning statement sets out that the Crushinton site has been operating in its current form since 2006, with a certificate of lawfulness for industrial use (as set out above in the planning history) having been granted.

The proposals are to cease the existing use, clear the site, and to construct up to 30 dwellings with associated access, parking and landscaping, together with biodiversity enhancements.



Principle

In respect of the adopted Core Strategy (2010), the site is located outside the settlement confines identified in Policy DM1 (and CP1). Whilst not included in the red line boundary submitted, it is likely the vehicular access to the site would be adjacent to the settlement confines boundary. Whilst this proximity is noted, the development would nonetheless be contrary to these policies.

Policy DM11 sets out that development that would generate travel will not be permitted outside the urban boundaries and rural settlement confines unless justified by development plan policies. It is not clear at this stage, how much travel and how many vehicle movements are generated by the existing use and if further information is provided, this could be taken into consideration in the assessment of an application. Without this however, the development would generate travel beyond the confines, contrary to the objectives of the policy.

Given the site is located outside the settlement confines, it is considered to be within the countryside and subject to Policies DM15 and DM16. DM15 sets out that development which would result in the loss of, or adversely affect the character or appearance of the countryside will only be permitted if it is in accordance with allocations made in development plan documents; or justified by the needs of agriculture; or justified by a need to sustain the rural economy or a rural community; it cannot be accommodated elsewhere and it does not result in the loss of ecological habitats. Measures should be incorporated to reduce, as far as practicable, any harmful effects on countryside character. The proposals do not appear to comply with the first three criteria, however an assessment would need to be made as to whether the development would result in an adverse effect on the character and appearance of the countryside (discussed further below).

Policy DM16 sets out that development that would harm the character of the landscape (as identified through the landscape character assessment) will only be permitted if it is in accordance with allocations made in development plan documents (and incorporates any necessary mitigation measures); or it can be sited to avoid or reduce the harm and/or incorporate design measures to mitigate the impacts to an acceptable level. Again, this is discussed further below.

Currently, the tilted balance approach of paragraph 11 of the NPPF is engaged in the assessment of applications. This is because the settlement confines on which Policy DM1 were devised were on the basis of delivering a lower number of dwellings per year than are currently needed. As such, Policy DM1 is considered to be more restrictive than the NPPF and the adopted Policies which rely on the DM1 settlement confines (which include policies DM11 and DM15) are, to varying extents, considered to hold reduced weight in the planning balance, however still accord with the broad sustainable development objectives of the NPPF.

Draft Local Plan Policies

The Submission Draft Dover District Local Plan (2023) is a material consideration, with draft policies attracting varying weight depending on the level of unresolved objections and accordance with the NPPF. As set out in the policy section above, there may be changes to the wording of some policies as the plan progresses and I would recommend that compliance of the proposals with these policies is addressed in a planning statement submitted with any forthcoming application.

Draft Policy SP4 relates to residential windfall development and sets out that development or infilling of a scale that is commensurate with that of the existing settlement will be permitted within or immediately adjoining the settlement boundaries, as shown on the policies map. The access to the site from Northwall Road would fall within the draft confines and part of the southern boundary of the site would adjoin those confines. It is noted that the site would in part adjoin a draft housing allocation (draft Policy SAP16 with an estimated capacity of 8 dwellings) to the east of the site. However, this would not be incorporated into the settlement confines until it is built out.

Based on the current wording of the draft policy, the proposals would not accord with SP4. However, having sought the views of the policy team, they have advised that following the discussion at the hearing session on SP4, it was agreed that the wording about 'immediately adjoining' confines would be reviewed to add flexibility. In this case, the site is in very close proximity to the built confines line (the access road also appears to adjoin it) and the site adjoins a draft allocation. In addition, it does add improvements in terms of residential amenity for existing residents, is in a built up residential area, and if creating an access to SAP16 allocation, would potentially result in a better layout and overall design for both sites.

Currently, we are awaiting the Inspectors comments and amendments will likely be made to the wording of policies in due course. Subject to the policy wording changes above, the policy team view is that the principle is acceptable.

A number of other draft policies would also be considered in the assessment of an application and these are discussed further below.

Character, Appearance & Residential Amenity

The supporting documents set out that the layout has been informed by the site constraints (the access, site levels and relationship with adjacent properties) and may be subject to revisions following further flood risk analysis work (discussed further below). Notwithstanding this, the following comments set out the matters that would be considered and amendments that could be made as the scheme is progressed.

In terms of the layout of the site, we have some concerns at this stage and would suggest alternative layouts are considered, which could also provide more variety in unit sizes to accommodate the housing mix required (discussed further below). In respect of the design of the 3 bed house, by having the entrance porch set back from the main front elevation, whilst being handy for access from the adjacent parking space, provides a rather blank elevation at ground floor level, with overlooking of the street from first floor level only. To create a more active street scene, you may wish to consider moving the door to be adjacent to the garage; a similar approach taken to development at Willowbank in Sandwich which required there to be no habitable accommodation at ground floor level due to flood constraints (albeit used a more traditional design and materials given the context of the historic settlement). Elsewhere, (e.g. Lydden and near Fort Burgoyne) creating integral car ports to some of the units has helped to create more interaction at ground floor level.

The range of materials and variety in building orientation would work well, creating visual interest which could be further enhanced with landscaping (and a landscaping scheme could be submitted as part of an application). In terms of the building heights, the surrounding area contains bungalows, chalet bungalows and two storey dwellings generally finished in brick; some with sections of tile hanging, cladding, and some in render. The indicative elevations and floor plans suggest the proposals would be 2 and 2 ½ storey dwellings. At this stage, it is not clear to what extent the land level would need to be raised due to flood risk and I

would recommend sections through the site are provided with any forthcoming application, giving some context to the ridge and eaves heights of neighbouring dwellings and land.

It would also be of assistance to show street scene elevations and I would recommend that street tree planting is considered (which would also accord with the objectives of draft policy CC8 and could assist in the integrated design of surface water drainage and biodiversity enhancements). To add some further variety, you may wish to consider adding picture window surrounds to some of the front elevations of the 4 bed units, or using sections of brick patterns or protruding brickwork to create further visual interest. I would recommend that details of street lighting are included in any forthcoming application, and it is clarified if the intention is for this to be adopted.

In respect of residential amenity, this would be considered in line with the NPPF (particularly paragraph 135), draft Policies PM1 and PM2. I note some of the existing buildings are to be retained and advise that it would be of assistance to provide some information clarifying their current use (and any other uses to which they may benefit) to help assess whether these would be compatible or whether there would be a conflict with the proposed dwellings (in terms of noise and disturbance from both operational activities and vehicle movements/deliveries etc).

Housing Mix & Affordable Housing – Draft Policy SP5 would be relevant and requires the provision of 30% affordable housing on schemes of 10 or more dwellings. This should be provided with a tenure split of 55% affordable/social rent 25% First Homes (at 30% discount rate) and 20% other affordable home ownership products and should be provided on site. I appreciate that on site, you advised there may be a need to review this position if significant contamination is found. Should that be the case, it may be necessary for the Council to have any viability assessment independently reviewed and the expectation would be for the applicant to pay for this.

Contamination – As discussed at the site, given the existing use of the land, I have informally sought the views of Environmental Protection Officers, who note it has benefitted from a waste management licence issued by the EA for several years and is also just south of the DO6 Golf Road landfill site where there may be residual gas migration underground. As such, they consider that at the very least, a phase I contaminated land assessment will be needed. This may recommend a phase II intrusive investigation and site remediation depending on the findings and they would be consulted on any forthcoming application.

Flood risk – The site is within flood zone 3 and I note that the adjacent site is a proposed allocation within the same flood zone (the draft allocation has been subject to the sequential test as part of the draft plan evidence base). However, this site would need to demonstrate it passes the sequential and exceptions tests. If submitted, the application would be subject to consultation with the Environment Agency and KCC Flood and Water Management (as a major application). It is likely that Southern Water would also be consulted. Regard would be had to the NPPF and draft Policies CC5 and CC6 when assessing the application.

Travel & Highways – As noted in the planning statement submitted, KCC Highways and Transportation offer a pre-application service and you may wish to contact them for advice on the information required (which could include the suitability of the access, emergency access requirements and arrangements for construction management). Further information is available at the following website: <https://www.kent.gov.uk/environment-waste-and-planning/planning-and-land/planning-applications/planning-advice/highway-pre-application-advice> In respect of the detailed design of the proposals, parking provision requirements are set out in Policy DM13 and Draft Policy TI3. The design and access statement sets out that there would be 16no. 3 bed dwellings, 8no. 4 bed dwellings and 4no. two bed apartments

(with the indicative plans showing the scheme of 28no. units). Based on the 'site plan as proposed', it is not clear if sufficient parking would be provided for each of the dwellings, with plots 21-26 having only 1 parking space despite being 3 bedroom dwellings (I note the indicative elevations show internal ground floor parking, however the site plan indicates landscaping to the front of these dwellings which could affect access). I would recommend you seek clarification of the parking provision requirements based on the number of bedrooms per unit from KCC Highways and Transportation, as well as guidance on the required level of visitor parking, to ensure this can be designed into the scheme (and as there is limited on-street parking available in the surrounding area).

Open Space & Contributions – Draft Policies PM3 (providing open space), PM4 (sports provision) and PM6 (community facilities and services) would be relevant to the determination of an application. In addition, KCC Economic Development may seek contributions in respect of libraries, education, care or waste. You may wish to contact KCC in advance of submitting an application to establish the level of contributions which might be sought.

Ecology – Draft Policies SP13, SP14 and NE1 would be considered in the assessment of an application. An ecological assessment will be required, which should consider avoidance, mitigation and enhancement as required. This will need to be submitted as part of any forthcoming application and will be subject to consultation with the Senior Natural Environment Officer. A minimum 10% biodiversity net gain will be required by Government for major applications and information demonstrating this should be submitted. Further guidance on this can be found in the planning practice guidance and at <https://www.gov.uk/guidance/understanding-biodiversity-net-gain>

SAMM – Draft Policy NE3 sets out that contributions are required towards the strategic access mitigation and monitoring (SAMM) strategy in relation to the Thanet Coast and Sandwich Bay SPA. The site lies within the 9km zone of influence and new residential accommodation within this area is considered to result in recreational pressure on the SPA. Contributions will normally be secured via a unilateral undertaking, however if other contributions are also required (as identified in the above paragraphs), it may be more practical to secure this via a Section 106 legal agreement. Further information on the strategy can be found at the following website address: <https://www.dover.gov.uk/Planning/Planning-Policy/Planning-Guidance/Thanet-Coast-and-Sandwich-Bay-SPA-Mitigation-and-Monitoring-Strategy.aspx>

Validation requirements – paragraph 6.7 of your planning statement sets out the reports/documents you intend to submit with any forthcoming application (planning & design and access statement; full drawing package; flood risk assessment; transport assessment; landscape and visual impact assessment; ground and contaminated land assessment; and ecological report). In addition to these, I would suggest a desk based archaeological assessment is submitted (in line with draft Policy HE3). In respect of the ecology survey (which could be in the form of a Phase 1 or preliminary ecological assessment), depending on the quality of the existing agricultural buildings, this may need to address potential for bats. In respect of the flood risk assessment, noting the site is in flood zone 3, I would expect this to include the sequential and exceptions test as necessary, and this would likely be subject to consultation with the Environment Agency and KCC Flood and Water Management (the lead local flood authority) given this would be a major application. In relation to the transport assessment, I would recommend this outlines the existing and estimated vehicle movements to or from the site and would support your approach of using KCC Highways' pre-application advice service to understand the information that would be required (as well as any site specific requirements and comments on the indicative layout, visibility splays, highways works/pedestrian footways and whether they would require

information relating to construction management). It would be helpful to clarify in any forthcoming application if the intention is for the highway to be adopted by KCC and any street lighting that would be provided within the development. A Biodiversity Net Gain metric will be required (see ecology section).

Conclusion

The site is located outside of the existing and proposed settlement confines, however it is noted that changes to the wording of the draft policy relating to windfall development (SP4) are expected to allow greater flexibility, which could support this proposal. It is also noted that the development would adjoin, and could provide an improved access for an adjacent draft housing allocation. Further information is required in respect of flood risk (particularly the sequential and exceptions test) which would affect the acceptability of the development. The above advice details other considerations which would be taken into account were an application to be submitted, including the provision of affordable housing, ecology, archaeology, contamination and other matters.

Further details of applying for planning permission can be found on our website at www.dover.gov.uk/planning. Please note that in addition to consents under the Planning Acts above, approval under Building Regulations legislation may also be required and you may wish to contact them to discuss this further. The Building Control department can be contacted on Tel: 01304 872495 or by email: buildingcontrol@dover.gov.uk

You will appreciate that this advice is given at officer level only and is not binding on the Council. Should you decide to submit a planning application, it may be that other issues or material considerations may arise during the advertisement and consultation period.

If you do choose to pursue a formal application then the following documents required for validation can be found at the following link; <http://www.dover.gov.uk/Planning/Planning-Applications/Making-Applications/Application-Forms.aspx>

I hope this is of assistance.

Yours faithfully



Senior Planning Officer