



Examination of the Dover District Local Plan

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Dear Ms Taylor,

1. We write further to the examination hearing sessions which concluded in December 2023. At the hearings we committed to write to the Council to set out our recommendations on any soundness matters which were not agreed in the sessions, and the subsequent need for further Main Modifications. We have now also visited the sites proposed for development in the Local Plan.
2. The Council and participants should note that these comments do not represent our full and/or final conclusions on these matters. They shall be set out in our Report, having first considered any representations made in response to the Main Modifications consultation.

Policy SAP1 – Whitfield Urban Extension

3. As submitted, Policy SAP1 requires an updated Supplementary Planning Document ('SPD') to guide the future delivery of the Whitfield Urban Extension. However, it is now the Council's position that a revised SPD is neither justified nor necessary. In seeking to rectify this soundness issue it was suggested by Officers that an updated masterplan would suffice instead.
4. Based on the written representations and discussions to date, we agree that the necessary detail could be adequately controlled by a masterplan and relevant criterion (a)-(aa). However, as discussed at the hearings, the masterplan does not need to include those parts of the site which already have planning permission and are under construction. This is not necessary for soundness as matters relating to the design, layout, landscaping and access for Phase 1 have already been approved. Consequential changes to the supporting text will also be required where the Plan refers to the need for a revised SPD.

5. Apart from the changes suggested by the Council in Submission Document SD06, no further Main Modifications are considered necessary to Policy SAP1 at this stage. Similarly, no changes are needed to Policy SP12 except the A258/A256 junction (discussed at the hearings) and introducing a cross reference to the Infrastructure Delivery Plan which forms part of the evidence base to support the Local Plan.
6. Our conclusions on the soundness of Policies SAP1 and SP12 will be set out in the final Report in due course, only after considering any representations made in response to the Main Modifications consultation.

Policy SAP40 – St Margarets-at-Cliffe - Land located between Salisbury Road and The Droveaway (STM010)

7. Site STM010 is within the Kent Downs National Landscape (formerly referred to as an Area of Outstanding Natural Beauty or 'AONB') and a Heritage Coast. The key characteristics of the area include the dramatic coastal landforms such as the chalk cliffs and pebble beaches, and the open, exposed arable landscape which stretches inland from the coast. Paragraph 176 of the National Planning Policy Framework states that great weight should be given to conserving and enhancing the landscape and scenic beauty in AONBs, which have the highest status of protection in relation to these issues.
8. The proposed allocation comprises an area of open land in between The Droveaway and Salisbury Road. These streets run uphill from the lower parts of St. Margarets until they reach the top where the site is located. The site is noticeably higher than the adjacent streets and effectively forms a raised plateau at one of the highest points of the village. Public rights of way also run alongside and through the site, meaning that any development in this location would be clearly visible within the public domain.
9. Due to the topography of the area and the prominence of the site, a development of around 10 houses in this location would have a significant visual impact. It would represent an unsympathetic and incongruous addition that would detract from the defining features and characteristics of the area. Although it has been suggested that houses could be sited on the lower parts of the site, the majority of the allocation is higher than its surroundings. We are therefore not convinced that an acceptable form of development could be achieved, even for a lower number of dwellings. Similarly, any new planting would take a significant amount of time to reach a level whereby it would effectively screen the development. Even then, we find nothing to suggest that it would be capable of mitigating the significant visual impact of housing on this elevated site.
10. We therefore conclude that the development proposed would be harmful to the character and appearance of the area and would fail to conserve and enhance the scenic beauty of the AONB. Site allocation STM010 is therefore not justified and should be deleted from the Plan. Consequential changes may also be required to the supporting text and/or housing trajectory and supply calculations.

Policy SAP28 – Land between Eythorne and Elvington

11. At the hearing sessions we discussed Main Modifications that are required to ensure that Eythorne and Elvington remain separate Local Centres.¹ Having now visited the area, for the same reasons it is also necessary to ensure that development of site SAP28 does not lead to any harmful coalescence. In drafting the changes to Policy SAP28 which have already been discussed, a further alteration is therefore needed to include a requirement to maintain physical and visual separation between the two settlements. The precise detail will be for the masterplanning process to determine, which is already a requirement of the Plan.

Next Steps

12. We trust that the necessary changes highlighted above are all self-explanatory and that you can accommodate them into the schedule of Main Modifications already in preparation. As already stated above, these comments do not represent our full findings on these matters, which shall be set out in full having considered any comments made in response to the proposed Main Modifications consultation.

13. In the meantime, should you have any queries please do not hesitate to contact us. We have asked the Programme Officer to upload a copy of this letter to the website for those following the examination, however, we are not seeking additional comments from participants at this stage.

Yours Sincerely,

Matthew Birkinshaw and Clive Coyne

Inspectors

¹ Suggested Main Modification AM58, Submission Document SD06